

IOMC workshop January 2023 – DUCG Intervention

How can front-runner companies and associations foster and enable economic sector and value chain action?

DUCG Introduction

DUCG is a platform of 11 European associations which represent “downstream” formulating industries ranging from cosmetics and detergents to aerosols, paints, inks, toners, pressroom chemicals, adhesives and sealants, construction chemicals, fragrances, lubricants, crop protection and chemical distributors industries. The group's main objective is to contribute, with a common voice, to the successful implementation of the requirements of the REACH and CLP Regulations.

The chemicals value chain is made up of i) chemicals manufacturers, ii) mixtures manufacturers (formulators) and iii) producers of articles. Each of these stakeholders have their own needs and contributions to the future objectives of the chemical sector. DUCG – representing 11 formulating sectors - is in a unique position of representing industry sectors with diverse products and business models that support a sustainable transition.

Safe and Sustainable Mixtures

DUCG members are committed to 'safe and sustainable mixtures'. But what does that commitment mean in practice? And how can the learnings of DUCG members be applied across to support the full value chain?

The first point to acknowledge is that you need to make different considerations for designing a 'safe and sustainable substance' than to design a 'safe and sustainable mixture'. This is an important consideration, when understanding the sector of chemistry that we are addressing and what, collectively we should try to achieve.

Cleaning products, paints, adhesives, lubricants, cosmetics, plant protection products to name just a few... they all have their own special properties and **performance** to deliver certain benefits. Considering the technicalities of formulation allows us to continue having performing products.

We start with the point of **safety**. This should not be interpreted merely as an *absence of hazards*. Hazard classification cannot be a default criterion to discount the sustainability of a mixture. Instead we take steps to manage and minimise the **risks**, assessments, information and warning labels. DUCG members work in a process of continuous improvement towards the creation of products that are **safe in use** –subject to some risk management measures being applied where appropriate. In this line, DUCG is working on the topic in three areas:

1. Communication of safe use data. For the past 20 years DUCG members have been actively engaged on the topic of supply chain communication with the aim of making safe use data more accessible to end users – professionals and consumers.
2. These days we frequently hear the term '**regrettable substitution**', which of course must be avoided; but as a concept this should be interpreted more broadly than just replacing one hazardous substance with another that subsequently turns out to be just as hazardous. For example, considering also the impact the substituting a substance could have on climate or resource use. DUCG is now thus actively engaged in the topic of 'assessment of alternatives' of substances in products to better define a process that would support the EU industry.

3. Advancements in Non-Animal Methods/ New Approach Methodologies (NAMs) to ensure good risk assessments with reduced animal testing

On the “**sustainable**” angle DUCC’s members have also been striving for years to reduce the intrinsic environmental impact of their products, in response to demand from consumers as well as professional and industrial customers seeking to reduce their own footprint. Formulating industries are typically highly innovative, with hundreds or even thousands of new or updated product launches each year.

Due to their very different production processes, the formulation of mixtures is not as energy intensive as the manufacturing of chemical substances. To make more sustainable mixtures DUCC members could utilize chemicals that have been manufactured with a lower energy footprint. However, greater sustainability benefits will be obtained by focusing on other stages of the life cycle of products (e.g. by targeting the use phase of the substance). Some DUCC members have already achieved important successes in terms of energy and CO2 reduction through voluntary schemes*.

Conclusion

To summarise – what should we consider when working towards a common understanding globally of what we are trying to achieve.

- You need to make different considerations for designing a ‘safe and sustainable substance’ than to design a ‘safe and sustainable mixture’
- Safety should not be interpreted merely as an *absence of hazards* – but rather DUCC would priorities the improvement in communication of safe use data, avoiding regrettable substitutions and working towards the advancements of non-animal testing.
- The sustainability angle is important, it can be a very sectors specific point and DUCC members have already achieved important successes in terms of energy and CO2 reduction through voluntary schemes
- Why is this important? Because considering the technicalities of formulation allows us to continue having performing products.

*DUCC members voluntary schemes

