



Downstream Users of Chemicals Co-ordination group

DUCC Intervention – Transition Pathways Meeting – 2023_03_06

DUCC is representing 11 EU associations. DUCC members make the chemical products that consumers and professionals buy and use. Over 9000 companies, the majority of which are SMEs, that are key to upholding food production, cleanliness, European heritage, self-esteem, art, durability and sustainability, while stimulating the regional economies of Europe. We are happy to comment to the transition pathways and particularly the chapter of sustainable competitiveness. An umbrella to many of the other building blocks presented in the Transition pathways document. We ask what does sustainable competitiveness look like for the chemicals **value** chain? For DUCC, it starts with **four** points:

1. **Hazard vs benefit:** We need a better reflection of the trade-off between Hazard/ Classification and Societal/ Env benefits. Banning the use of a hazardous substance means reducing the technological toolkit available to EU formulators and will in many cases lead to reduction in performance of EU manufactured products. With limited benefits to end users if considering exposure.
2. **Innovation drivers for end-users:** Innovation on substances/ creation of new chemistries will **only** work if these substances find an application in end-use
3. **Enforcement:** enforcement is crucial to ensure only safe products are placed on the EU market and for the competitiveness of EU businesses
4. **Sectoral expertise:** We highlight the importance of sectorial engagement that has already taken place to increase the sustainability of products such as **voluntary schemes of DUCC sectors**.

On this fourth point, let's delve further in the value chain. In the chemical value chain we have chemical substances becoming mixtures. For example, let's start with fragrances.

The **IFRA-IOFI Sustainability Charter** includes responsible sourcing of ingredients across the value chain, reducing environmental footprint and enhancing well-being of employees. Focus areas that we can see fitting into the Transition pathway objectives.

Fragrances are examples of mixtures that go into mixtures.

- In the value chain mixtures become end-products. Adhesives for instance. We look at the **FEICA good practice stories** showing industry's commitment to achieve: Energy savings, Material efficiency, Repairability and Recycling. Key components of sustainable competitiveness.
- Or detergents that through the **AISE Charter for Sustainable Cleaning** have since 2006 shown substantial decreases in energy use and CO2 emissions decoupled from production.
- Distributors of chemicals and products also play a role. I highlight the **Fecc European Responsible Care Program for Chemical Distributors**. It includes KPIs and Improvement Plans - linked to UN Sustainable Development Goals. An Online Safety Library with Guidelines and good practice sharing.

We've only shared four out of the 11 DUCC sectors – there are many more initiatives at play! Because the chemicals supply chain is complex – DUCC should know, we've been working on supply chain communication for 20 years.

We started with ENES and this work has now transformed. DUCC and Cefic are collaborating on supply chain communication, and we hope to share with you the needs of SMEs if we want to make European supply chains **digital**. Past work of DUCC also included simplification of safe use information for professionals – via tools like the SUMIs. This year we will expand on this work by engaging in the **EU Year of Skills** with an online platform for professionals.

The point of my examples is this: a good transition happens when the knowledge, good practices and learnings of the past are built on, to go to the future. As DUCC we ask you to engage with us, to share knowledge, skills and experiences and forge together the different pathways to the transition.