



Downstream Users of Chemicals Co-ordination group

DUCC input on Commission's roadmap to phase out animal testing in chemical safety assessments

Call for evidence

October 2024

The Downstream Users of Chemicals Co-ordination Group (DUCC), representing 11 European associations whose member companies use chemicals to formulate mixtures would like to provide the following feedback to the Commission on the [roadmap](#) to phase out animal testing in chemical safety assessments.

DUCC is committed to reducing and avoiding unnecessary animal testing through maximising the use of non-animal New Approach Methodologies (NAMs). Some of our members are actively engaged in research on alternatives to animal testing and contribute to research and development (R&D) activities and are active participants of the [European Partnership for Alternative Approaches to Animal Testing \(EPAA\)](#) and other platforms.

DUCC supports transitioning to animal-free chemical safety assessment, emphasising the need for improved development, validation, and regulatory acceptance of non-animal methods. This transition should be gradual and include a clearly planned roadmap and milestones, identifying in the short-term opportunities to accelerate regulatory adoption based on current scientific progress, while in the longer term, full replacement will depend on rethinking the processes for validating and incorporating new approaches into legislation. DUCC strongly agrees with the notion that a greater focus on alternative test methods would lead to greater innovation and a reduction in the reliance on in vivo methods.

Overall, DUCC sees the developing of a Commission roadmap on animal testing as an opportunity to break away from the belief that animal models are the best tools for ensuring chemical safety. We believe that safety assessments should take into account both hazards and exposure, prioritising the acceptance and application of non-animal methods wherever possible. Through continued investment in NAMs and increased scientific knowledge, DUCC remains committed to reducing animal testing while ensuring the highest standards of safety for human health and the environment.

DUCC remains active on this topic and would be interested in participating in the Commission's targeted consultation on the roadmap, which is planned for Q4 2024/Q1 2025.



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About DUCC

DUCC is a joint platform of **11 European associations** whose member companies use chemicals to **formulate mixtures** (as finished or intermediary products) for professional and industrial users, as well as for consumers.

DUCC focuses on the downstream users' needs, rights, duties and specificities under **REACH** and **CLP**.

DUCC's membership represents several important industry sectors, ranging from cosmetics and detergents to aerosols, paints, inks, toners, pressroom chemicals, adhesives and sealants, construction chemicals, fragrances, disinfectants, lubricants, crop protection, and chemical distributors industries. Altogether, their membership comprises more than **9.000 companies** across the respective sectors in Europe, **the vast majority being SMEs**. The calculated turnover of these companies is more than 215 billion euros in Europe.

For more information on DUCC: www.ducc.eu

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DUCC's public ID number in the **Transparency Register of the European Commission** is: **70941697936-72**