



Downstream Users of Chemicals Co-ordination group

# The Downstream Users of Chemicals Co-ordination Group (DUCC) position on the **REACH** revision

May 2025

The REACH revision is a crucial opportunity to uphold its status as the **leading chemicals management legislation globally while enhancing European industry competitiveness**. It is a chance to maintain high protection standards, reduce administrative burdens, and align with the [Competitiveness Compass](#) and the [Clean Industrial Deal](#), through a targeted and effective revision.

Therefore, DUCC proposes the following **7 strategic recommendations** for the REACH revision.



## 1. Clear regulatory predictability

Predictability about upcoming requirements is vital to ensure long-term investment, innovation, and competitiveness in the EU chemicals industry and its downstream users while enabling sustainable transitions. Companies require sufficient time to engage in regulatory procedures, offering the necessary data and expertise for authorities to make science-based decisions.

To achieve this, we call for the development of a **regulatory roadmap** that assigns priorities and clear timelines for regulatory actions on substances. This roadmap enables industry and authorities to plan strategically for necessary tasks and resources, fostering innovation and facilitating the transition to alternatives.

In order to prevent overlapping regulatory demands on any single sector and help SMEs manage compliance, this well-defined roadmap must be followed by EU authorities, Member States and industry. It should encompass all regulatory measures related to chemicals management, not just REACH initiatives, to avoid an overload of simultaneous regulatory requirements.



## 2. Effective and data-based regulatory decisions

Any regulatory framework should be grounded in science and evidence, incorporating assessments of exposure, risk, and socio-economic considerations. The REACH revision must avoid simplistic assessments – such as extending the Generic Risk Management Approach (GRA) to apply blanket bans to new categories of hazards – and focus on actions when substances pose an unacceptable risk.

Instead, **measures must be targeted, considering sector-specific needs and value chain dynamics**. By implementing the above-mentioned roadmap, regulatory actions would incorporate all necessary information to determine the best legal route, which for example could be Occupational Safety and Health (OSH) measures.

What matters most (substance/use combination/exposure) should prevail when it comes to risk management. A better upfront understanding of the use, exposure, and alternatives of certain substances will allow a well-founded decision as to which regulatory route, if any, should be used.



## 3. Scientific rigour for the assessment of combined exposure to multiple chemical substances

The introduction of a blanket Mixture Allocation Factor (MAF) in chemical safety assessments needs to be opposed as it risks the **loss of many essential products** that have been safely used for decades. This approach **deviates from a robust, science-based regulatory model**, calling into question the EU's credibility as a global leader in evidence-driven legislation. By imposing disproportionate measures that are not mirrored elsewhere, it risks **undermining the competitiveness of European industry** – placing EU-based companies at a disadvantage compared to global competitors operating under more balanced frameworks.

DUCC has previously conducted [research](#), which shows that MAF will affect a wide range of sectors, on valuable, sustainable substance uses, increase animal testing, impact employment and EU competitiveness.

Products are generally already assessed for their uses under REACH, which includes multiple safety factors. Current REACH and sector-specific legislation have well-established methods to assess the safety of substances, whether they are used alone or in mixtures. These assessments are designed to be cautious and take into account the entire life cycle of a substance – from its use to its waste. They consider potential combined exposures (i.e. the exposure to multiple substances by a single or multiple use(s)).

Combined exposure is a complex matter and should not be addressed via this ‘simple’ solution.



## 4. Approach to polymers

Introducing registration obligations for polymers would counteract simplification efforts, due to the large number of polymers on the EU market and the fact that it would make many downstream users registrants for the first time. Targeted risk management is more suitable for polymers posing potential risks to health or the environment.

Furthermore, implementing information requirements for polymers under REACH presents significant challenges for both industry and authorities. A balanced regulatory strategy through the aforementioned roadmap is crucial to avoid restricting innovation and increasing costs. We advocate focusing on **polymers with known risks rather than blanket registration requirements**, using the existing regulatory tools to define a target group of polymers. This approach would ensure competitiveness without compromising safety or environmental protection.



## 5. Strengthening enforcement

It is imperative to have effective enforcement mechanisms to prevent non-compliant products reaching the EU market. DUCC supports enhanced **cooperation between the EU and Member States** to address the lack of border control and checks in online sales. EU companies face challenges in competing, further hindered by non-compliant imports that do not meet EU standards.

Clear actions and resources are needed to improve cooperation between the EU and its Member States, ensuring fairness between EU-made products and those from outside the EU. Regulatory **measures must also be enforceable**, providing tools such as test methods to check compliance of mixtures and articles.



## 6. Digitalising supply chain communication

Effective communication on the safe use of chemicals along the supply chain is vital for proper risk control by downstream users, with formulators playing a central role. DUCC supports **improving supply chain communication** and encourages exploration of enhancements in the REACH revision. A standardised electronic format (e.g. XML-based) for sharing safety data could be beneficial, provided user-friendly interfaces are developed.



## 7. Uptake of non-animal methods (NAMs)

DUCC supports **transitioning to animal-free chemical safety assessment**, emphasising the need for improved development, validation, regulatory acceptance, and uptake of NAMs. This transition should be gradual and include a **clearly planned roadmap** with short-term opportunities to accelerate adoption based on current science, and long-term plans for full replacement by rethinking validation and legislative processes.

### 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](http://www.ducc.eu)

Paula Diaz – DUCC Chair, [p.diaz@feica.eu](mailto:p.diaz@feica.eu)

Cristina Arregui – DUCC Vice-Chair, [carregui@ifrafragrance.org](mailto:carregui@ifrafragrance.org)

Triin Kaup – DUCC Platform Manager, [triin.kaup@ducc.eu](mailto:triin.kaup@ducc.eu)

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