



Downstream Users of Chemicals Co-ordination group

The voice of formulators

FEA 2015 Forum, Prague
23/09/2015

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REACH Issue Manager >

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DUCC in a nutshell



- founded in **2001**
- a platform for associations
 - with **similar goals** and **objectives**
 - whose member companies use chemicals to **formulate mixtures** as finished products for **end users**, including consumers and professional users

MAIN OBJECTIVE

To contribute, with a **common voice**, to the **successful implementation** of the requirements of the **REACH** and **CLP** Regulations



Who are we?



A.I.S.E. – International Association for Soaps, Detergents and Maintenance Products
CEPE – European Council of the Paint, Printing Ink and Artists' Colours Industry
Cosmetics Europe
ECPA – European Crop Protection Association
EFCC – European Federation for Construction Chemicals
FEA – European Aerosol Federation
Fecc – European Association of Chemical Distributors
FEICA – the Association of European Adhesive & Sealant Industry
I&P Europe – Imaging and Printing Association e.V.
IFRA – International Fragrance Association



What do we do?



After being part of the legislative process, we now work mainly on the implementation aspects

- We **exchange** views and expertise internally
- We **advise** and **help** our members on how to implement REACH and CLP
- We **publish** guidance documents, practical tools and common positions (by consensus)
- We **dialogue** with ECHA (the European Chemicals Agency) and other stakeholders
- We **coordinate** projects
- We **organise** activities
- We **communicate** on our views (website, events,...)
- (...)



How do we work internally?



We meet face-to-face, over the phone and exchange (many) emails!

- The **Directors** meet once a year (January)
- The **Coordination Group** meets four times a year
- The **Task Forces** meet many times a year



Sylvie Lemoine
Chair



Janice Robinson
Vice-Chair

- We have a **Chair** and a **Vice-Chair**
- I am ensuring the DUCG Secretariat as “**REACH** Issue Manager” (0.5 FTE)
- We have the “dossier holders” for **CLP** and **other topics**



And how do we work with the external world?



- We participate in most of the **REACH and CLP external bodies** (CARACAL, Directors Contact Group, HelpNet)
- We are represented in the **Cefic working groups** (via our members)
- We are “founding members” of two important **ECHA initiatives** which bring together industry and authorities
 - *ENES – the Exchange Network on Exposure Scenarios*
 - *“CSR/ES Roadmap” – Roadmap on the topic of Chemical Safety Report and Exposure Scenarios*
- We participate in many **industry initiatives** (e.g. REACH Cross Sector Group)
- We are requested to **provide comments** on publications from external parties (e.g. ECHA Practical Guides, other more “informal” initiatives)
- We make **presentations** in many events (Cefic workshops, ENES workshops, ECHA Stakeholders’ Day, Forum, ...)



Our recognition as a valuable stakeholder – example 1



Exchange Network on Exposure Scenarios (ENES)

This collaborative network aims to identify good practices on preparing and implementing exposure scenarios, and to develop an effective communication exchange between supply chain actors to improve the protection of human health and the environment.

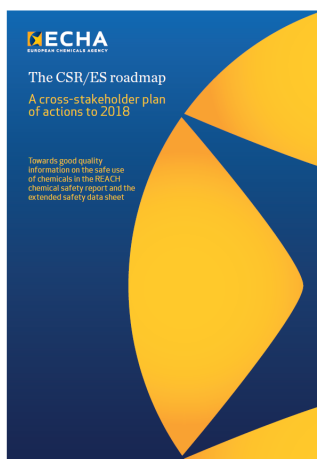
The network has been established by ECHA together with sector organisations Cefic, Concawe, Eurometaux, Fecc, A.I.S.E and **DUCC** to share knowledge, techniques and approaches to building and applying (REACH) exposure scenarios.

Extract from ECHA website:

<http://echa.europa.eu/en/about-us/exchange-network-on-exposure-scenarios>



Our recognition as a valuable stakeholder – example 2



APPENDIX I. COMPOSITION OF THE ROADMAP COORDINATION GROUP

Representatives from Member State authorities		
AT	Eugen Awander	Federal State Service Vorarlberg
DE	Eva Lechtenberg-Auffarth	BfArM - Federal Institute of Occupational Safety and Health
DK	Bengt Horn-Andersen	Danish Ministry of Environment
IT	Flaviano d'Amico	National Agency for New Technologies, Energy and Sustainable Economic Development
IT	Renato Cabbella	Istituto Superiore di Sanità
ES	Ruben Cordoba	Spanish Ministry of Health, Social Services and Equality
NL	Renske Beetsma	Inspectorate SZW
PL	Monika Wasilek-Gromek	Bureau for Chemical Substances
UK	Christine Northage	Health and Safety Executive
Representatives from industry		
Cefic	Erwin Anzys	
CONCAWE	Chris Money	
BOCC	Sylvie Lemoine	
DUCC	Laura Portugal	
Representatives from ECHA		
	Andreas Ahrens	
	Andrew Murray	
	Laura Wallin	



Extract from the CSR/ES Roadmap:

http://echa.europa.eu/documents/10162/15669641/csr_es_roadmap_en.pdf

Priorities for 2015-2016



1. REACH activities & projects
2. CLP
3. Other topics





REACH activities & projects

Most of the current activities/projects are linked to the CSR/ES Roadmap

The previously identified DUCC priorities/issues have been integrated in the action areas and respective actions of the “CSR/ES Roadmap”, with a timeline of 2013-2018

✓ *DUCC is leading, co-leading and contributing to most of the ongoing actions*

- Mapping and communication of uses → “improved” sector **use maps**
- Chemical Safety Assessment elements → **SCEDs** - Specific Consumer Exposure Determinants; **SpERCS** - Specific Environmental Release categories; **SWEDs** – Sector-specific Worker Exposure Description
- Downstream User Chemical Safety Assessment (**DU CSA**)
- Structured **Short Titles** for Exposure Scenarios (and Table of Contents)
- Safe use of mixtures information (**SUMIs**)
- **ESCom 2**



REACH activities & projects

Why are these activities important to us?

- To contribute to the **harmonisation** of the information that our members communicate to their suppliers
- To provide **realistic elements** for our suppliers to perform a chemical safety assessment when they register the substances that we buy
- To provide a **structure, format** and **guidelines** when our members will need to perform themselves a chemical safety assessment (DU CSA)
- To **create rules** for suppliers to send **structured** titles for the exposure scenarios that they annex to the safety data sheets
(this will help our members to identify which ES are relevant)
- To provide **methodologies** for our members to select which information they need to forward to their clients when they sell their mixtures

OVERALL

The Roadmap activities aim to **improve the quality** of the information used by the suppliers (registrants) which will consequently improve the quality of the information that our members receive for handling chemicals safely



CLP

- Harmonisation of information to Poison Centres (art. 45)
- CLP labeling issues and increased labelling requirements in general (art. 33 – small packaging labelling, fold-out labels,...)
- Testing of phys-chem priorities
- Organisation of a 2nd Workshop on the classification of mixtures



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Other topics

- **Authorisation** under REACH (e.g. Sensitisers as Substances of Very High Concern; SVHC Roadmap 2020)
- Role of downstream users in **substance evaluation**
- Monitoring of Forum and **enforcement** activities
- ECHA Communications Network – e.g. ECHA's videos
- Monitoring of **REACH review** follow-ups
- Endocrine Disruptors
- Nanomaterials
- Explosive precursors
- “Fitness Check” of Chemicals legislation / Smart Regulation
- Cumulative Cost Assessment
- Maintenance of website – publication of all DUCC positions and guidelines
- (...)

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Benefits of being a DUCC member

- Your concern is our concern
- Together we are stronger
- One step (or two...) closer to ECHA, Member State Competent Authorities and European Commission
- Benefit from DUCC's recognition and reputation
- Benefit from a pool of expertise – better support to your members in turn



Concluding remarks



- DUCC is a **very active** platform
- DUCC is **recognised** by other industry sectors and by the European Commission and ECHA as a **valuable partner** (invited, consulted,...)
- DUCC's **successes** rely on the **dedication** of its members
- DUCC members appreciate all the initiatives

*... and the **recognition** of DUCC continues to increase!*





Thank you!



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DUCG's public ID number in the Transparency Register is: **70941697936-72**