



Downstream Users of Chemicals Co-ordination group

Marketing and use of explosives precursors – updated rules Call for Evidence DUCC feedback

DUCC actively participates in the EC *Standing Committee on Precursors* and is highly supportive of the ambitions to improve the security of EEA citizens.

DUCC would like to provide the following preliminary feedback.

Article 9

DUCC would like to highlight the need to keep flexibility for the verification upon sales and proof of identity because there is no one-size-fits-all solution due to the variety of businesses and markets.

Annexes I and II

If new chemicals would be included in the Annexes, DUCC would like to engage at the earliest stage to assess the impact, especially if it concerns consumer products.

More focus on suspicious transactions, significant disappearances and thefts, and less on administrative burden

The current Regulation requires the professional industry to annually renew the certificates confirming legitimate uses of explosives precursors. The means in practice that for example a dairy processing plant who receives explosives precursors every week needs to confirm annually that they are still in the dairy industry. This way it becomes one of these chores that do not get the attention it needs to e.g. prevent theft of chemicals.

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

Triin Kaup – DUCC Manager, triin.kaup@ducc.eu

Alain D'haese – DUCC contact person on precursors, alain.dhaese@aerosol.org

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