



Downstream Users of Chemicals Co-ordination group

DUCC'S HISTORY OF SUPPORTING REACH

Final 5 November 2018

DUCC is a joint platform of **11 European associations representing mostly formulators**, e.g. cosmetics and detergents to aerosols, paints, inks, toners, pressroom chemicals, adhesives and sealants, construction chemicals, fragrances, lubricants and chemical distributors industries. Our membership comprises **more than 9.000 companies** across the respective sectors in Europe, the vast majority being SMEs, with a calculated **turnover of more than 215 billion euros** in Europe.

DUCC is a **co-founding member** of two important **ECHA multistakeholder initiatives** on the topic of **supply chain communication**: the Exchange Network of Exposure Scenarios (**ENES**)¹ and the Chemical Safety Report/Exposure Scenarios Roadmap (**CSR/ES Roadmap**)² – several activities from these initiatives are contributing to the implementation of some of the REACH Review proposed actions.³

DUCC has participated in the public consultation on the REACH Review and welcomes, in general, its results.⁴

As communicated during CARACAL 27, DUCC renews its availability to engage with the Commission and stakeholders in the implementation of the REACH review actions and to contribute in a constructive manner.

In view of the discussions on the REACH Review earlier this year, DUCC wishes to highlight the history of its contributions to REACH.

We believe that the tools developed so far, either by DUCC or by individual DUCC members, listed in the Annex to this document, can contribute to the implementation of some of the actions from the REACH Review.

Therefore, we urge the Commission to **support and promote all the tools that have been developed by DUCC and DUCC members** related to the REACH Regulation.

¹ <https://echa.europa.eu/about-us/exchange-network-on-exposure-scenarios>

² <https://echa.europa.eu/regulations/reach/registration/information-requirements/chemical-safety-report/csr-es-roadmap>

³ The activities from the "[ENES Work Programme to 2020](#)" (the most recent action plan) considered relevant are indicated for each topic in the remaining document.

⁴ http://www.ducc.eu/documents/DUCC_Fitness%20Check_final%2020%2009%202017.pdf

ANNEX - REACH REVIEW ACTIONS AND DUCC'S HISTORY OF CONTRIBUTION TO THE REACH IMPLEMENTATION

Action 1: Encourage updating of registration dossiers

DUCC encourages registrants to use the **information made available by downstream user sectors** (i.e. the “**use maps packages**”, as described under action 3) for any necessary dossier updates, so that they will be performing realistic exposure assessments, therefore improving dossier quality. Only by communicating robust, realistic and appropriate risk management measures and operational conditions will registrants allow downstream users to perform efficiently their duties.

DUCC also urges the Commission to promote all the work done by DUCC and individual downstream users on improving the information available for registrants.

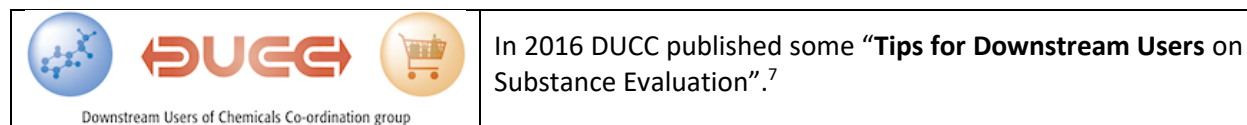
Action 2: Improving evaluation procedures

The **involvement of the downstream users in substance evaluation** (SEv) can be very helpful, but the overall process is currently lacking a mechanism for such participation.

DUCC has therefore been discussing with Cefic, ECHA and the COM about a potential mechanism for downstream users who are in possession of relevant information – particularly on use and exposure – to be able to contribute to the substance evaluation process. This possibility is mentioned in ECHA's leaflet on Substance Evaluation⁵ but to date no solution has been found to put it into practice.

Our concern has already been mentioned in the contribution of DUCC to the public consultation in relation to the REACH REFIT evaluation⁶ and we remain available for discussing a potential mechanism to involve downstream users in the SEv.

In the meantime, we would like to suggest that if, as a result of a SEv, a registration dossier will have to be updated, ECHA draws the attention of the registrant to the tools and information mentioned under action 1 above – this can only contribute to an improvement in the quality of the dossier.



⁵ https://echa.europa.eu/documents/10162/13628/sub_eval_under_reach_leaflet_en.pdf

⁶ http://www.ducc.eu/documents/DUCC%20views%20on%20REACH%20review_final.pdf

⁷ <http://www.ducc.eu/documents/DUCC%20Tips%20for%20DUs%20on%20SEv%20FINAL.pdf>

Action 3: Improving the workability and quality of extended Safety Data Sheets

DUCC recognises the importance of **developing and using harmonised formats** to improve the workability of extended SDS by facilitating communication along the supply chain.

	<p>In 2009 DUCC has created the UseR template – Use Reporting template, for downstream users to communicate their uses to their suppliers, as per article 37 (2) of REACH. This template has been the inspiration for the Use Maps template, as currently advised by ECHA.⁸</p> <p>DUCC will continue raising awareness on the importance of sector use maps to support registrants in generating meaningful exposure scenarios.⁹ In October 2016 a joint statement on sector use maps was signed by DUCC, Cefic and ECHA.¹⁰</p> <p>All relevant information is centralised on the dedicated ECHA website, also in CHESAR format. As of today, the following DUCC members have developed and published sectorial use maps:</p> <ul style="list-style-type: none"> - A.I.S.E. - CEPE (pending) - Cosmetics Europe - ECPA - EFCC - FEICA - I&P <p><i>This topic is considered under the “ENES Work Programme to 2020” – actions 2.1.- 2.6., 3.1..</i></p>
	<p>As part of its efforts for improving the safe use of chemicals, and following the initial approaches for simplifying the information on uses and use conditions for workers, in 2015 DUCC created the concept of the SWEDs – Sector-specific Workers Exposure Determinants. The current template, developed in the context of the CSR/ES Roadmap initiative, has been based on the initial DUCC contributions.</p> <p>As of today, the following DUCC members have published SWEDs:</p> <ul style="list-style-type: none"> - A.I.S.E. - CEPE (pending) - Cosmetics Europe - EFCC - FEICA - I&P <p><i>NB: The approach developed for deriving and communicating information for the safe-use of mixtures by workers comprises</i></p>

⁸ <https://echa.europa.eu/csr-es-roadmap/use-maps/concept>

⁹ Example of presentation: http://www.ducc.eu/documents/Sector%20Use%20Maps_July%202016.pdf

¹⁰ <http://www.ducc.eu/documents/Joint%20statement%20on%20Sector%20use%20maps.pdf>





		<p>a second element (SUMI) to assist the end-users – as described under action 12 below.</p> <p><i>This topic is considered under the “ENES Work Programme to 2020” – actions 2.1.-2.4., 2.6., 3.2., 4.1., 4.4..</i></p>
 	 	<p>In 2014 DUCC and Concawe developed a template and guidance¹¹ for the SCEDs – Specific Consumer Exposure Determinants, with the objective of improving the information that registrants will have available when performing a consumer exposure assessment.</p> <p>DUCC members contributed to the update of the related ECHA guidance Chapter R.15 on Consumer exposure assessment, and have subsequently amended the SCED template¹².</p> <p>As of today, the following DUCC members have published SCEDs:</p> <ul style="list-style-type: none"> - A.I.S.E. (including two SCEDs factsheets which were developed with FEA) - CEPE (pending) - FEICA <p><i>Note: the SCEDs Guidance is currently being revised.</i></p> <p><i>This topic is considered under the “ENES Work Programme to 2020” – actions 2.1.- 2.4., 2.6., 4.5..</i></p>
 <p>Downstream Users of Chemicals Co-ordination group</p>		<p>In 2014 DUCC coordinated a project for the development of the “Guidelines for structuring Short Titles in exposure scenarios for communication”¹³ in the context of the CSR/ES Roadmap initiative. These commonly agreed rules aim, among other things, to improve clarity when naming and reading the short titles of exposure scenarios, as well as communication.</p> <p><i>This topic is considered under the “ENES Work Programme to 2020” – actions 3.3.(a), 3.3. (b).</i></p>
 <p>Downstream Users of Chemicals Co-ordination group</p>		<p>Since 2011, DUCC has been a partner of Cefic on the development and maintenance of the ESCom standard, for the exchange of exposure scenario data between IT systems, in order to enable consistent and harmonised communication of exposure scenario information throughout the supply chain.</p> <p>The ESCom Standard comprises the XML Format and the Standard Phrases Catalogue.¹⁴</p> <p><i>This topic is considered under the “ENES Work Programme to 2020” – action 3.3.(b).</i></p>
		<p>Since 2009, DUCC has contributed to the development of SPERCs – Specific Environmental Release Categories, with the objective of establishing transparent, harmonized and more</p>

¹¹ http://www.ducc.eu/DownloadDocument.aspx?document_id=61

¹² http://www.ducc.eu/DownloadDocument.aspx?document_id=89 (revised version October 2016, published in Sept 2017)

¹³ https://echa.europa.eu/view-article/-/journal_content/title/structured-short-titles-for-exposure-scenarios-workshop-report-published






¹⁴ <http://www.cefic.org/Industry-support/Implementing-reach/escom/>

   	  	<p>realistic estimates when performing environmental chemical safety assessments.</p> <p>In 2016, following on from the outcome of ECHA's SPERC Best Practice Project and earlier reviews by authorities, DUCC contributed to the development of the revised SPERC factsheet template¹⁵ and corresponding background documents (BD). More recently, as part of the ENES programme (CSR/ES Roadmap action area 2.3), a set of quality criteria is being discussed aiming to establish a high level of quality and harmonisation for SPERCs.</p> <p>As of today, the following DUCC members have established SpERCs for their sectors:</p> <ul style="list-style-type: none"> - A.I.S.E. - CEPE - Cosmetics Europe - ECPA - EFCC (available in the latest template, along with BDs) - FEICA (available in the latest template, along with BDs) - IFRA <p><i>This topic is considered under the “ENES Work Programme to 2020” – actions 2.1.-2.4., 2.6..</i></p>
  		<p>Since 2008 DUCC members have been contributing to the improvement of chemical safety assessments, either by assisting with the data-update/revision of well-known tools (e.g. ECETOC-TRA, ConsExpo) or by developing sector-specific tools to support adequate, robust and customized human health and environmental risk assessments for their respective sectors.</p> <p>As of today, the following DUCC members have developed sector specific tools to support better risk assessments:</p> <ul style="list-style-type: none"> - AISE: HERA, REACT - ECPA: REACH-IN OWB, REACH-IN LET - FEA: BAMA Indoor Air model

¹⁵ https://echa.europa.eu/view-article/-/journal_content/title/new-sperc-factsheet

Action 12: Interface REACH and OSH

DUCC has created tools to fill the gaps in legislation, through focusing on improving communication to Downstream Users with the aim of increasing safety in the workplace.

    	<p>In 2015, the template¹⁶ for the SUMIs - Safe Use of Mixtures Information has been developed as a communication means, to facilitate the information-flow downstream to end-users (i.e. industrial or professional users).</p> <p>SUMIs can assist in implementing the Occupational Safety and Health (OSH) requirements, as they provide the “product’s safe use information” in a simplified and tailored manner for an easier understanding.</p> <p>In 2017, a set of slides explaining the concept and usage of SUMIs has been created and translated into other 7 EU languages¹⁷, as well as a paper explaining their operational framework¹⁸. A Guideline on the overall approach created for workers is also available¹⁹.</p> <p>Recently, DUCC has also developed seven pictograms which describe safe use conditions²⁰.</p> <p>As of today, the following DUCC members have created SUMIs:</p> <ul style="list-style-type: none">- A.I.S.E.- CEPE (published for members)- FEICA (to be published)- I&P Europe <p><i>This topic is considered under the “ENES Work Programme to 2020” – actions 4.1., 4.4., 5.2..</i></p>
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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**

¹⁶ <http://www.ducc.eu/documents/SUMI%20template.docx>

¹⁷ <http://www.ducc.eu/Publications.aspx> – Publications/Guidance & Tools/2017

¹⁸ http://www.ducc.eu/documents/How%20to%20use%20SUMIs_operational%20framework_18%2007%202017.pdf

¹⁹

<http://www.ducc.eu/documents/Sector%20specific%20approaches%20towards%20developing%20and%20communicating%20information%20for%20the%20safe%20use%20of%20mixtures%20FINAL.pdf>

²⁰ <http://www.ducc.eu/News.aspx#news5>