



Downstream Users of Chemicals Co-ordination group

## Transition Pathways for the Chemical Industry

### *DUCC comments*

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The Downstream User of Chemicals Coordination Group (DUCC), representing 11 European associations whose member companies use chemicals to formulate mixtures, thanks the Commission for the opportunity to provide comments to the Transition Pathways for the chemical industry.

#### *Comments to the Transition Pathways Document*

- DUCC is in a unique position of representing industry sectors with diverse products and business models that **support the European Union in achieving the overarching goals of the twin transition.**
- As part of the consultation held on the draft Commission outline in February, DUCC and its members provided detailed information on the building blocks characterising the transition pathway, illustrating our points with concrete sector's examples or case-studies.
- While we fully understand the need for a high-level outline for the Transition Pathway for Chemicals, we regret that the examples that we shared as part of this consultation were not included. Concrete examples help people grasp the **fundamental role chemical substances play in our society, in our daily life** and the **complexity of the associated value chains**. We would support **further improvements**, to illustrate these elements as this could guide future political decisions – implying future trade-offs to be carefully looked at when deciding on the future EU requirements.
- DUCC would like to share the following specific comments:
  - **Topic 13 “More effective and predictable regulation”**- Commission highlights as a concrete action the “Timely provision of key concepts and definitions (e.g., SSbD, Essential Use, Most Harmful Substances, Mixture Assessment Factors, climate/carbon neutrality, non-fossil carbon, MRVs, chemical recycling, etc.)”. DUCC values timely provisions but believes that it is critical for these to also be **proportionate, meaningful**, adopting a **holistic approach**, considering the **specificities of the different industry sectors** and the **complexity of chemical value chains**. This must be done considering stakeholders' input.
  - **Topic 14 “Coherent and consistent legislation”** - DUCC supports the “green deal consistency check” proposal to ensure alignment between the Green Deal and other policy measures, including the Commission's Better Regulation toolbox and the need to assess conflicting EU policy goals in EU policies. DUCC would appreciate receiving more information on how this will be concretely implemented.
  - **Topic 24 “Deployment of available technologies for chemical digital manufacturing”**– The action for industry to provide PCF (Product Carbon Footprints) data for Chemicals has been included. DUCC would like to ensure this is the correct terminology and would like to receive clarification on whether specific criteria are considered to define the PCF. As an alternative, we view the term “environmental impact” as possibly more appropriate.



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- DUCG would like to reiterate its **full support for the development of the Transition Pathway for the chemical sector**. This co-creation work is critical in allowing the sectors' transformation towards the successful implementation of EU Green Deal objectives. We therefore encourage the creation of case-study(ies) for further guiding the Transition Pathway, and sharing success stories as examples. In this regard, we would appreciate receiving further details on the development of these case-studies (required information and level of details, timeline, etc.).
- Lastly, we would appreciate receiving some further information on:
  - Next steps
  - The interplay between the co-creation of this Transition Pathway and other actions related to the CSS (as the High-Level Round Table discussions)
  - Upcoming engagement plans from the Commission

*Comments to the priorities*

With regards to the priorities identified by Commission for the transition pathways, DUCG highlights the following as being most important to DUCG members:

Topic	
Topic 13: More effective and predictable regulation	Coherence and predictability of regulation are important for industry and innovation.
Topic 14: Coherent and consistent legislation	
Topic 5: Innovation and growth potential of SMEs	Important issue for companies and especially SMEs
Topic 7: Safe and Predictable Returns on Investments	
Topic 1: International Competitiveness	



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

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