

Minutes on Meeting with DUCC on second DUCC workshop on Assessment of Alternative Substances in Mixtures

11 April 2023

Online

Participants:

DUCC: [REDACTED] (DUCC), [REDACTED] (FEICA), [REDACTED] (CEPE), [REDACTED] (IFRA), [REDACTED] (Cosmetics Europe)

European Commission (DG GROW): [REDACTED]

The objective of the meeting was to discuss the content of the second DUCC workshop on Assessment of Alternative (AoA) Substances in Mixtures that will take place on the 24th of April. DUCC had provided some input in advance, outlining their proposal for a systematic AoA within the REACH restriction and authorisation processes. Their idea is to create sub-groups on uses composed of Member States and industry technical experts which would lead technical discussions on alternatives and substitution before a restriction or Annex XIV decision is adopted. A newly created Main ECHA Assessment of Alternatives Committee would coordinate the sub-groups, evaluate the outcomes, and forward them to the European Commission for the latter to consider during the decision-making process. With this approach they hope to prevent general bans that do not take account of the particularities of different uses.

COM was thankful for the input and expressed its general interest in the idea, even if it might be necessary to apply lighter structures than this is done under the Montreal Protocol, as REACH regulates a much higher number of substances and therefore requires less granularity. COM is interested in continuing the dialogue with DUCC to assess practicalities of ways to better take into account availability of alternatives in future decisions.

In more general terms, DUCC shared its concerns about the fact that, under the Commission's current approach for the revised REACH, derogations will only be possible for essential uses. They drew attention to numerous uses falling in the category of 'clearly non-essential', such as alcohol in perfums, the ban of which would have a major impact on society.