

From: [REDACTED]
To: [REDACTED] (GROW); [REDACTED] (GROW); [REDACTED] (GROW)
Cc: [REDACTED] (GROW); [REDACTED] (GROW); [REDACTED] (GROW); [REDACTED] (GROW-EXT); [REDACTED] (GROW)
Subject: RE: Extension of the generic approach to risk management - engagement with formulators/ DUCC
Date: vendredi 13 mai 2022 16:29:25
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.png](#)
[2022-05-13 DUCC AMFEP presentation_final.pdf](#)
[2022-05-13 DUCC Professionals FEICA_final.pdf](#)

Dear [REDACTED], dear all,

I would really like to thank you again for engaging with us today and answering our questions. Please find attached the slides we presented.

I have also invited [REDACTED] to the DUCC Workshop on Use and Exposure on the 19th May. Of course, if there is further interest from your side, I am available.

Wishing you all a lovely weekend.

Kind regards,

[REDACTED]

-

[REDACTED] [@aise.eu](mailto:[REDACTED]@aise.eu) • Mobile: +32 [REDACTED]
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Transparency Register: 70941697936-72



From: [REDACTED]@ec.europa.eu>
Sent: 12 May 2022 09:36
To: [REDACTED]@aise.eu>; [REDACTED]
[REDACTED]@ec.europa.eu>
Cc: [REDACTED]@ec.europa.eu>
Subject: RE: Extension of the generic approach to risk management - engagement with formulators/ DUCC

Dear [REDACTED]

There has been a little misunderstanding concerning the room. I booked a very small room for the Commission participants only. Therefore I am sending you the list of participants from our side. We look forward to receiving the dial in details for the meeting from you. [REDACTED] will get back

to you concerning the agenda.

Best regards,

██████████

██████████ (GROW)	██████████ @ec.europa.eu
██████████ (GROW)	██████████ @ec.europa.eu
██████████ (GROW)	██████████ @ec.europa.eu
██████████ (GROW)	██████████ @ec.europa.eu
██████████ (GROW)	██████████ @ec.europa.eu
██████████ (GROW-EXT)	██████████ @ext.ec.europa.eu
██████████ (GROW)	██████████ @ec.europa.eu

From: ██████████ [@aise.eu](mailto:██████████@aise.eu)>

Sent: Wednesday, May 11, 2022 11:44 AM

To: ██████████ (GROW) ██████████ [@ec.europa.eu](mailto:██████████@ec.europa.eu)>

Cc: ██████████ (GROW) ██████████ [@ec.europa.eu](mailto:██████████@ec.europa.eu)> ██████████

██████████ [@ec.europa.eu](mailto:██████████@ec.europa.eu)>

Subject: RE: Extension of the generic approach to risk management - engagement with formulators/ DUCC

Dear ██████████ dear all,

Thank you for your feedback. We would be more than happy to meet you in person. I would suggest a hybrid meeting however as not all participants will be able to travel to Brussels.

I have asked the members who wish to join in person to let me know by today and will revert back to you.

Kind regards,

██████████
██

-

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From: [REDACTED] <[REDACTED]@ec.europa.eu>

Sent: 11 May 2022 11:01

To: [REDACTED] <[REDACTED]@aise.eu>

Cc: [REDACTED] <[REDACTED]@ec.europa.eu>; [REDACTED]

[REDACTED] <[REDACTED]@ec.europa.eu>

Subject: RE: Extension of the generic approach to risk management - engagement with formulators/ DUCC

Dear [REDACTED]

The agenda is fine for us

Please note that we have booked a room for a face to face meeting in our building in Nerviens 105.

Are you coming? We can also have an hybrid meeting for those that cannot come

Participants from Commission

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Thanks

Best Regards

[REDACTED]

From: [REDACTED] <[REDACTED]@aise.eu>

Sent: Wednesday, May 11, 2022 8:59 AM

To: [REDACTED] <[REDACTED]@ec.europa.eu>; [REDACTED]

[REDACTED] <[REDACTED]@ec.europa.eu>

Subject: RE: Extension of the generic approach to risk management - engagement with formulators/ DUCC

Dear [REDACTED]

As I have not received any feedback on your side, I wanted to know if you had any input on the agenda we proposed and if you could share who will join us from Commission so I may forward the meeting invite.

Thank you and regards,

[REDACTED]
[REDACTED]

-
[REDACTED] [\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu) • **Mobile:** +32 [REDACTED]
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From: [REDACTED]
Sent: 05 May 2022 16:12
To: [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu); [REDACTED]
[REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Subject: FW: Extension of the generic approach to risk management - engagement with formulators/ DUC

Dear [REDACTED],

On the 13th May we have scheduled a call with DUC experts on the GRA. I would like to share a proposed agenda attached also with a list of the participants from our side.

We would like to present two examples to you, and will also be joined by suppliers (for the enzyme example) and end users (for the professional example) to bring you a range of perspectives from different points in the supply chain.

Then we would propose to have some discussion and as part of this wanted to know if the experts of Commission would be willing to do a short presentation sharing their thoughts on the details of how the GRA would be applied. Some of our questions relate to:

- Derogations process
- Threshold (generic limit 0.1% or 0.01% or specific concentration limits...)
- Safe use/ minimum exposure
- Analysis of alternatives
- Time wise
- Results obtained from the GRA workshop

Finally, we wish to share with you some preliminary results on a survey carried out by DUC members on use and exposure.

I would appreciate to know if you have any comments on our proposed agenda. Also, I would be grateful if you would share who will join from Commission's side and I will forward them the dial in details for the meeting.

Kind regards,

[REDACTED]

[REDACTED]

-
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From: [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>

Sent: 07 April 2022 19:52

To: [REDACTED] [@aise.eu](mailto:[REDACTED]@aise.eu)>

Cc: [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED]

[REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED]

[REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>

Subject: FW: Extension of the generic approach to risk management - engagement with formulators/ DUCC

Dear [REDACTED],

I am happy to meet for a session but our agenda will be very full in May, so I would have to ask you to limit the duration to 1 hour. It would also be good to know about the examples beforehand, so that we can make sure the concerned colleagues will be present. Can I ask you to arrange the practical details with [REDACTED], and any operational questions (such as agenda etc.) with [REDACTED] in cc)?
Many thanks in advance
[REDACTED]

From: [REDACTED] [@aise.eu](mailto:[REDACTED]@aise.eu)>

Sent: Thursday, April 7, 2022 11:54 AM

To: [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED]

[REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>

Subject: Extension of the generic approach to risk management - engagement with formulators/ DUCC

Dear [REDACTED],

I am writing on behalf of the Downstream Users of Chemicals Coordination group (DUCC) in relation to the extension of the generic approach to risk management in the REACH that was presented at CARACAL 44.

Yesterday we shared our comments on the paper presented CARACAL and this included three examples that we have created to provide some more concrete insight into the point of view and challenges of downstream user, formulating industries. We would like to request the possibility to present these examples to you in more detail, through a meeting or working session where we could invite DUCC experts to share insights with you and your colleagues. Our aim would be to supplement our written comments with expert industry input.

In addition to the examples, we currently have other activities ongoing to collect data to support you in a future, workable regulation. We have some questionnaires ongoing that

we have launched with Ducc members, formulating industries and also end users (i.e. professionals). We are working to collect this information towards the end of April, early May in consideration of the Commission's CARACAL timelines.

We would be eager to share our insights with you and have an exchange that is also tailored to your needs. Please let me know if you would be available for such a working session in the month of May. I would suggest that the timing of such a session could be between 2 – 3h depending also on interests and level of detail of the discussion.

Thank you and kind regards,

[Redacted]
[Redacted]

- [Redacted] [@aise.eu](mailto:[Redacted]@aise.eu) • **Mobile:** +32 [Redacted]

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