

Subject: FW: DUCC Use and Exposure_Slides
Date: jeudi 19 mai 2022 18:06:59
Attachments: [2022-05-13 DUCC CSS TF Use and exposure-Final.pdf](#)

Dear colleagues,

I hope this e-mail finds you well.

Today (19 May), [REDACTED] attended the workshop by the Downstream Users Chemicals Coordination Group (DUCC) on the proposal to expand downstream user reporting requirements on uses and exposure. Attached also the slides presented today by DUCC.

Here the main topics discussed.

IA study on additional information requirements on uses and exposure

- The contractor (RPA) introduced the policy option on DUs reporting on uses and exposure. RPA specified that the scope of such information requirements depends on multiple aspects (e.g. whether the option should apply to only SVHC or all hazardous substances; reporting frequencies for DUs; application of thresholds on tonnages).
- Industry asked clarification on how the DUs reporting requirements will fit into the extension of the GRA. In this regard, ENV explained that that the information on uses and exposure could be useful to better focus on articles with high exposure potential.

DUCC survey

- DUCC explained that a survey was carried in Apr 2022 among its members and DUs of different sectors to collect feedback on the additional requirements on uses and exposure. 65 companies participated (38 large companies; 15 medium sized companies and 10 small companies).
- The respondents expressed the following concerns over the DUs reporting requirements:
 - Respondents did not consider workable a system that applies to all hazardous substances and all tonnages. SMEs indicated that 50% extra resources would be needed if the information requirements apply to all substances with a hazard classification. SMEs fear that they might go out of business due to high reporting obligations.
 - DUs claim that it would be difficult to get the exact quantities of a certain substance from their suppliers due to Confidential Business Information (CBI). During the workshop, industry added that it would be difficult to know such quantities particularly for intermediates such as polymers.
 - DUs pointed out that the estimated tonnages of a substance could be double counted.
- The participants provided information on how frequently their mixtures are reformulated. Timeframes are heterogeneous (e.g. day to day; bi-yearly basis). Reformulation periods depend on the specific characteristics of a sector, company and business model.
- The survey provided also information on the learnings from existing reporting systems, such as the CLP Annex VIII and the SCIP database. DUs claimed that these databases present too many details, are not user-friendly and time-consuming.
- Experiences with existing databases were taken into account by the respondents to consider the time necessary to set-up systems to report on uses and exposure. Responses indicated a timeframe from 1,5y to 5y. Industry pointed out that formulators have already IT systems allowing them to provide hazard related data to authorities. According to industry, the issue is about volume data since systems covering hazard data are not matched to inventory systems.

Best regards,

[REDACTED]

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Dear all,

I would like to thank you for joining us this morning at the DUCC Workshop on Use and Exposure.
Please find the slides as presented attached.

Looking further to continue engaging on this topic.

Kind regards,

[REDACTED]

[REDACTED]

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