

DUCC AoA Invitation to MS

To: CARACAL REACH network of Experts – Competent Authorities

DUCC is a platform of 11 European associations which are downstream users of chemicals, ranging from cosmetics and detergents to aerosols, paints, inks, toners, pressroom chemicals, adhesives and sealants, construction chemicals, fragrances, lubricants, crop protection and chemical distributors industries.

The group's main objective is to contribute, with a common voice, to the successful implementation of the requirements of the REACH and CLP Regulations.

In the discussions on Generic Risk Management – DUCC wishes to stress that: elimination of a substance with no alternatives for an application leads to elimination of entire product categories. To avoid unintended impacts on EU Society, a robust Assessment of Alternatives is key to making good decisions. The essential use concept could be included, but it should be a complementary tool for decision making, the last step in the process, not the main driver for regulatory decisions.

DUCC would like to invite member state competent authorities to a workshop to have an exchange on the topic of "Assessment of Alternatives". Our aim would be to present some examples, with practical considerations and then discuss criteria and details to make the process realistic, streamlined and implementable.

We'd like to enquire on the interest of member states to have such an exchange with us, in December or January and if there is a preference regarding time period.



To share feedback in writing or express interest, please contact DUCC secretariat:

 [@aise.eu](mailto:secretariat@aise.eu)