

Supply Chain Communication of Exposure Information

25/10/2023



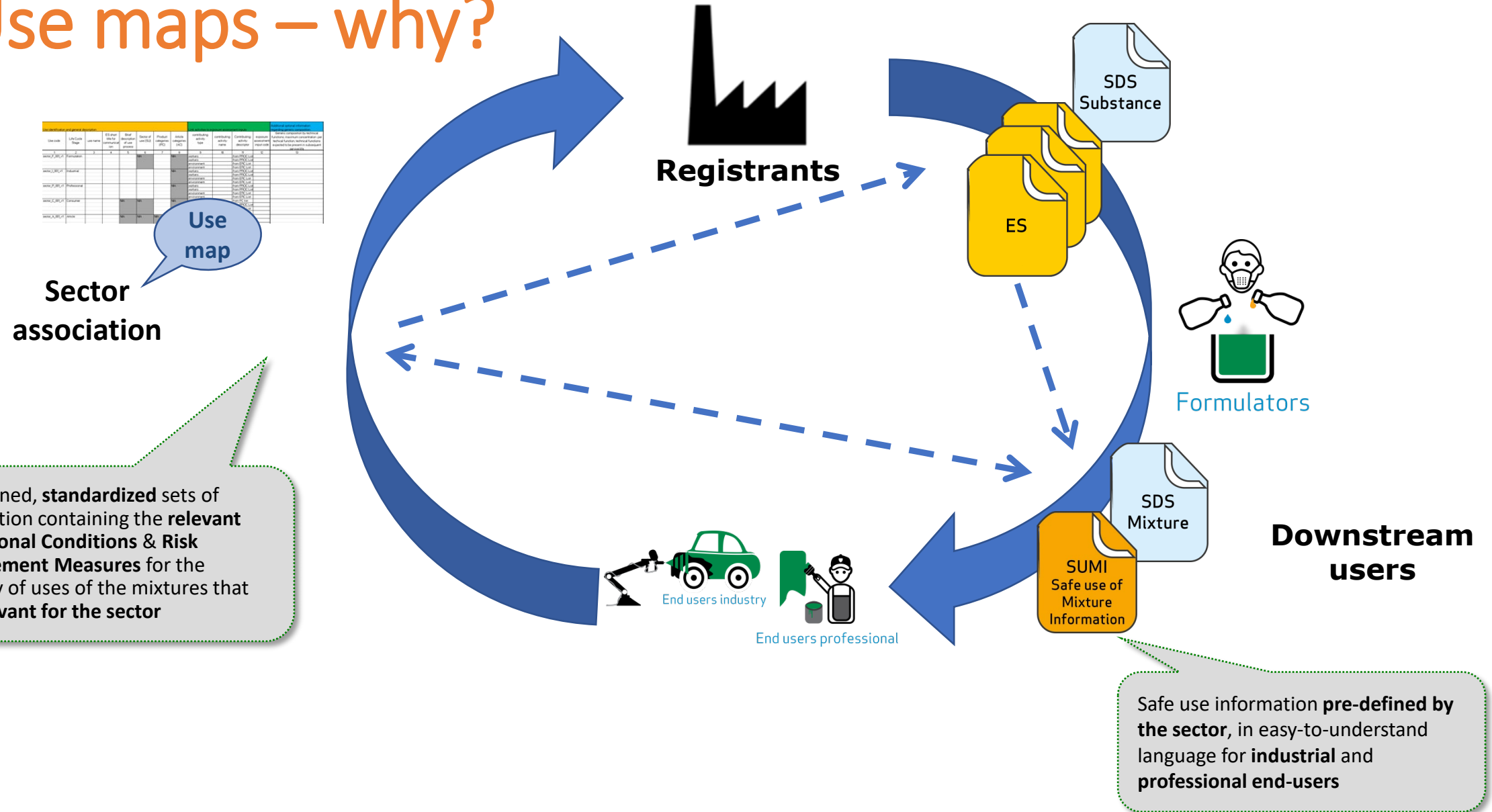
Downstream Users of Chemicals Co-ordination group

Use and Exposure Information

... key to REACH processes

*cf. REACH “**use**: means any processing, formulation, consumption, storage, keeping, treatment, filling into containers, transfer from one container to another, mixing, production of an article or any other utilisation”*

- When a substance is **registered** its foreseeable uses (**identified uses**) should be assessed by the registrants
- The identified (and covered) uses will be **communicated** in the **Safety Data Sheet** and **Exposure Scenarios**
- Use maps were the means for a downstream user to make its use known, i.e. to **report** it to the registrant → REACH art. 37(2) + art. 37(3)



Use maps – by whom ?

- Sector associations → have the knowledge on the way their products are used within the sector

Use maps – for whom ?

- Registrants → input for the Chemical Safety Assessment
- Formulators → internal mapping of uses

Use maps – how?

- Call for volunteers
- Sector associations to initiate discussions with their member companies:
 1. Identify relevant uses and respective contributing activities (objective: cover 80% market)
 2. Describe the uses + contributing activities (operational conditions and risk management measures) by means of:
 - Use Descriptors (R.12 ECHA Guidance)
 - Standard phrases (ESCom Standard Phrases Catalogue)
 - Other terminology
- Consider need for (internal) guidance
- Approval process
- Publication

Use maps – what?

- Template: Excel file
- Description of relevant uses within the sector + other elements that may be needed by the registrants to perform the risk assessment
- In most cases, it contains (only) information to allow the registrants to perform an exposure assessment at screening level or “Tier-1” level, using e.g. the ECETOC Targeted Risk Assessment tool.

Use Maps packages:

1. use description
2. exposure assessment inputs

Use maps – what?

Use description

[illegible]

Standard use description + codes (grouped per Life Cycle Stage)

Life Cycle Stage: manufacture, formulation or re-packaging,
industrial use, professional use, consumer use,...

Contributing activities per use
+ link to exposure assessment
inputs
(SWEDs, SCEDs and SPERCs)

Additional
information
(optional)

- Each line (in the yellow part) \Leftrightarrow 1 use
- Each use $\Leftrightarrow \geq 1$ contributing activity(ies)
- Each contributing activity \Leftrightarrow 1 exposure assessment input
(for workers, consumers and/or the environment, as appropriate)

- SWED: **S**pecific **W**orker **E**xposure **D**escription
- SCED: **S**pecific **C**onsumer **E**xposure **D**eterminant
- SPERC: **S**pecific **E**nvironmental **R**elease **C**ategory⁷

Use maps – what?

Exposure assessment inputs

Provide the **details** of use (operational conditions + risk management measures)

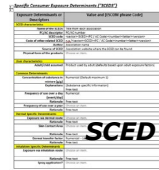
Workers



- Duration of activity
- Place of use
- Physical form of the used product
- Operating temperature
- Details on:
 - ventilation
 - PPE
- ...

**ECHA
Guidance
on CSA
R.14. +
others**

Consumers



- Concentration of substance in the mixture (indicative)
- Physical form
- Frequency of use
- Details on exposure (dermal, inhalation, oral)
- Skin contact area
- ...

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others**

Environment



- Main emission sources (air, water, soil)
- Type of process (continuous, batch)
- Degree of containment
- Waste water
- Waste handling
- RMM on site
- Release fractions (air, water, soil, waste)
- ...

**ECHA
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on CSA
R.16. +
others**

Safe use information **pre-defined by the sector**, in easy-to-understand language for **industrial and professional end-users**

Use maps – Aims/Benefits

- Quality : good use descriptions will lead to realistic conditions in the exposure scenarios
- Harmonisation : description of uses + information in the ES
- Clarity : standard phrases
- Representativeness : covering most uses in a sector / agreed by the involved industry
- Internal procedures : formulators can use them for internal mapping of uses
- Automation : available in Excel + Chesar format
- Efficiency : avoids unnecessary communication in the supply chain

'Barriers' faced in the use of exposure information

Cefic/DUCC Pilot on Use Maps – Q3 2018 –Q2 2019

- Several suggestions for improvement were made – to be discussed further/ implemented
- MAIN FINDINGS
 - Registrants → CSA based on sector use maps works easily in practice at tier 1 level (Chesar, ECETOC TRA) : Consistent outcome + Efficient work-flow
 - Formulators → benefits materialise when all ES are based on a sector use map

'Barriers' faced in the use of exposure information

Cefic/DUCC Pilot on Use Maps – Q3 2018 –Q2 2019

- **Lack of understanding/ guidance:** registrants deviated from the use map information and/or derived the assessment outcome (e.g. highest safe concentration or amount) in different ways
- **Complexity:** room to reduce the repetition of identical assessments by registrants within and across Use Maps (different uses and/or contributing activities, but same conditions of use).
- **Conservatism of the use maps:** finding a balance between encompassing different uses vs. accuracy.

Barriers' faced in the use of exposure information

Other reasons – consultations with DUEG members

Balance between grouping and product portfolios: Grouping of uses is needed to not do an assessment for everything, however, then grouped descriptions do not fit all company portfolios. Finding that balance is not easy.

Downstream users must act based on the data they receive:

- Guidance: A discrepancy between the data available and the expectations of authorities in terms of the detail that can be provided.
- Enforcement: enforcement actions can target companies stuck in a system that has data gaps, instead of acting to improve the process.

'Barriers' faced in the use of exposure information

Cefic/DUCC Pilot on Use Maps - Suggestions for improvement:

REACH Review Action 3

1. Refinement (and some extension) of the existing mandatory minimum requirements for the content of the SDS.
2. Put in place a common XML format for company-to-company electronic communication of the safety data in the supply chain

Digital data as a solution

Minimum Requirements

Joint Initiative from  **cefic** &  **DUCG** 
Downstream Users of Chemicals Co-ordination group

What are minimum requirements?

1. Requirements can refer to legal requirements, making it easier companies to meet legal obligations
➡ usually referred to as “minimum requirements”
2. Requirements can also refer to definition of IT systems (defining what a new tool should be able to do)
➡ normally referred to as “requirements”. (This is what IT people usually talk about and not the legal requirements).

Why do we need/discuss this?

SDS information should reach end user of chemicals in a effective, efficient and timely way that really makes the work safer and protects the environment

Digital data as a solution

Minimum Requirements

Joint Initiative from  cefic &  

- 2 meetings of dedicated expert groups in Q1/2023
- Ongoing discussions
- Derived recommendations for:
 - Minimum digital data for SDS
- Sections 1, 2, 3, 8.1 and 9 are required as electronic data package

IN DISCUSSION

Next steps....



Questions... ?