

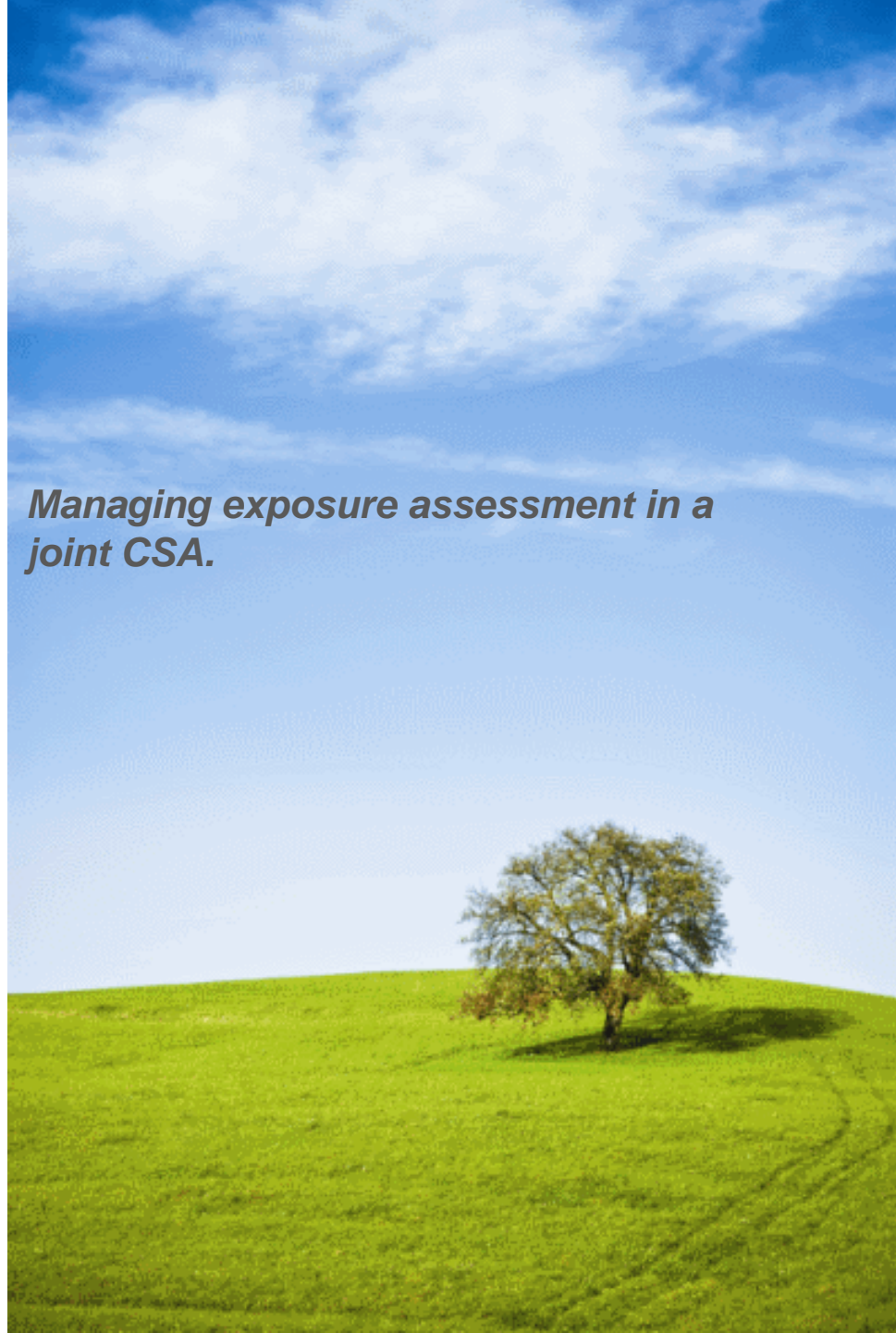


**Exchange Network on
Exposure Scenarios
November 24-25, 2011**

Leo Appelman

Turning our REACH expertise into practical help for industry

*Managing exposure assessment in a
joint CSA.*



Main Topics of today

ReachCentrum: some key figures

Options for preparing the CSA

Reasoning for submitting CSA/CSR individually

Possible solutions to have only one CSR

ReachCentrum: Some key figures

Our numbers

- 105 consortia managed
- 10 SIEF Leadership Teams managed
- 400 lead dossiers registered
- 342 SIEFs used the ReachCentrum's LoA e-shop
- About 1800 people attended the ReachCentrum events

Options for preparing the CSA

Option 1:

IUCLID and CSR prepared in common and

- submitted as joint submission
- submitted individually

Option 2:

IUCLID and CSR prepared partly in common and submitted individually

Option 3:

IUCLID as joint submission and CSR prepared separately and submitted individually

Reasoning for submitting CSA/CSR individually

IUCLID and CSR prep in common and individual submission of the CSR:

- LR does not want to take the responsibility for the updates
- LR does not want to have the administrative burden for updating the dossier

IUCLID and CSR prepared partly in common and submitted individually

- Risk Assessment for the environment is dependent on volume and number of locations
- Risk Assessment for the environment by indirect consumer exposure is volume-dependent (local release and regional release)

Possible solutions to facilitate one CSR

- 1. Increased responsiveness from SIEF membership and increased level of practical knowledge at the SIEF member.**
- 2. Information on volume and number of production locations: use of a “trustee” for registrants.**
- 3. Local release: use a realistic local tonnage based on known emission scenarios eg from OECD ESDs without sharing confidential data**
- 4. Regional Release: use ‘inflated’ total tonnage to conceal confidential information**



THANK YOU!

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Peter Fisk Associates, UK**

