

Exposure Scenarios:  
What has worked well. What did not work so well.  
The industry perspective

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## Undertaking a new journey...

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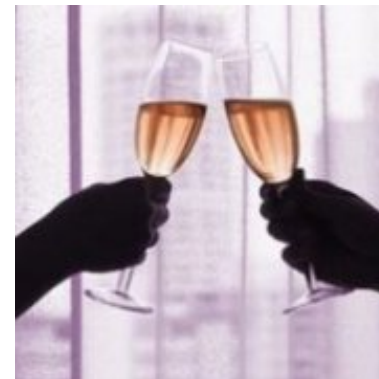
June 2007 the REACH regulation came into force

Both ECHA and industry – from their respective roles – have initiated all the necessary activities and made great efforts to meet the November 2010 registration objectives

ECHA and Industry have succeeded in meeting these objectives

This is a great achievement considering that - both for ECHA and industry – structures, processes and tools for accomplishing this had to be developed or designed during the same period :

learning by doing...



## The perspective from industry

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**This presentation addresses the perspective of industry on what has been accomplished**

**Although there was guidance on Use and ES development available, this was experienced as not sufficiently practical and tailored to industries needs yet.**

**So what worked well and what did not work so well in achieving this?**

**What learnings do we derive from these experiences?**

## What has worked well

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- The ongoing dialogue between industry and ECHA from the start
- Availability of a system and guidance to describe uses by a logical combination of use descriptors (Use Descriptor System)
- Guidance, tools and templates developed by industry (Cefic, DUCC, ECETOC)
  - *Generic Exposure Scenario concept, tools and guidance*
  - *Specific ES template; DUCC UseR template*
  - *Guidance on exposure assessment and communication in the supply chain*
  - *spERC development and guidance*
  - *ECETOC TRA tool*

# Impact on ES development and assessment

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- **Harmonizing effect on description of uses**
- **Harmonizing effect on ES structure**
- **Facilitation of mass processing of ES development, assessment and documentation**

## What did not work so well

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- **Limited implementation of top-down supply chain communication approach by industry**  
*(unstructured, massive communication on uses in the supply chain)*
- **ES format for CSR (chapter 9+10) difficult to use**  
*(e.g. illogical split between ES description and assessment, many different (overlapping) tables)*
- **Introduction of changes to ES related guidance during the 2010 timeline**  
*(e.g. ES format (9 to 4 section), reversing order in ES (worker, environment))*
- **Achieving agreement between ECHA and industry on pragmatic solutions**  
*(e.g. facilitating high throughput of risk assessments)*

## Impact on ES development and assessment

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- **Unstructured communication on uses within the supply chain lead to much extra work for industry, however did not result in useful information on use and use conditions**
- **During the learning process companies/consortia have developed ES formats that better fitted their needs. This has resulted in a variety of ES formats used in CSR and extended SDS**
- **The changes to the ES format caused confusion and rework for industry**

## Learnings for the 2013/18 timeline

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- Further harmonization needed on use description (both on interpretation of use descriptors and structure/elements of the use description)
- Development of (harmonized) IT supported communication (*e.g. the ESCOM package*)
- Need for further improvement of assessment tools
- Avoid introduction of new or changed guidance, tools, templates during the 2013 timeline
- Continued dialogue between ECHA and industry, specifically on pragmatic solutions for industry (*as is currently done on the inclusion of industry developed elements in Chesar (e.g. spERCs, GES, XML, standard phrases)*)





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# Thank you for your attention!

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