



**European Committee of Organic
Surfactants and their Intermediates**

A Sector Group of Cefic

Exposure Scenarios - practical example of a surfactant producer

***Exchange Network on Exposure Scenarios
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Agenda



- **Surfactants producers**
- **Short Term Perspective**
- **Medium Term Perspective**



- **Surfactants producers are large, medium and small sized enterprises**
- **Surfactants have quite different properties:**
 - **Foaming ability**
 - **Detergency**
 - **Emulsification**
 - **Wetting properties**
 - **Water solubility**



Surfactants are used by numerous DU:

- AISE (detergent producers) (135 ES)
- COLIPA (cosmetics) (19 ES)
- TEGEWA (manufacturers of textile and leather auxiliaries) (31 ES)
- ECPA (crop protection) (14 ES)
- EFMA (Fertilisers) (24 ES)
- EFCC (construction chemicals) (35 ES)
- FECC (distributors) (15 ES)
- ATC / ATIEL (lubricants) (55 ES)
- FEICA (adhesives) (11 ES)
- CEPE (coatings and inks) (165 ES)
- EPDLA (polymer dispersions) (32 ES)
- CONCAWE (petroleum substances) (24 ES)

ES = Exposure Scenarios



- **The DUCC tables itself are a good tool to provide sufficient information in a structured way.**
- **But it is essential that the DUCC tables are filled properly. Otherwise the data input for the generation of the corresponding ES might be incomplete. This might lead to errors in the assumptions that are used for the ES calculations.**
- **As some industry associations haven't jet provided any DUCC table we invite theses to establish such a table so that their uses can be easily covered as well.**



- **A lot of exposure scenarios are identical independent from the DU organization:**
 - **Receiving of products**
 - **Formulation of products**
 - **Filling of final products in small containers**
- **All these scenarios (having the same operational conditions) have to be described only once; all duplicates can be removed.**
- **This will already reduce the amount of ES by at least 10 - 15 %.**



- **Some of the DU organizations have made a lot of efforts to distinguish between all possible exposure scenarios looking more for the differences and not for the common ground.**
- **For the DU a high number of ES is complicated to understand and to choose the right environment his own products goes into as a high number of DU are SME.**
- **Therefore a broader description will bring together different ES under one umbrella description.**



- **Benefits:**

- making the number of ES smaller and
- the description better understandable for the DU.

- **Some consortia have done so already during the registration process in phase I.**

- **LAS sodium salt: 20 ES**
- **AES sodium salt: above 500 ES**



- **It would be highly appreciated if the DU organizations could provide more information on which ES are relevant for specific substance groups (e.g. surfactants, dye stuffs, solvents, etc.)**
- **Furthermore it would be helpful obtaining additionally some more information from the DU organizations on the typical concentrations of the substance in the final products.**



- **Producers/Importers and DU should identify the really necessary information provided by the ES**
- **Do the DU understand the content of the ES?**
- **In big industrial environments I do not have any doubts.**
- **But what's about a small sized professional DU?**
- **We do see here a clear action point for DUCG to train especially the small DU how to deal with ES.**
 - ➔ **VCI is currently creating a short brochure on this topic which shall be distributed by CEFIC as well.**
 - ➔ **DUCG could do something similar or refer to the existing initiative.**



- **In future the electronic transfer of the details of the ES from seller to buyer can bring additional benefit for both parties.**
- **The implementation of the XML standard (ESComXML) should have a very high priority.**
- **It would be an ideal situation if the ES out of the CSR could be used for the eSDS and transported by ESComXML to the DU.**
- **Additionally it should be allowed that registrants provide the ES on a server and only a link to that server is communicated in the MSDS.**
- **Printing of all ES should be avoided in future as per ES you have to calculate with about 10 - 15 pages.**
- **By the way, MSDS have never been part of the transport documentation.**

Thank you !



Thank you very much for your kind interest!

