



Downstream Users of Chemicals Co-ordination group

Collection and Communication of Uses

Best practice from a formulator's perspective



Use chemicals?
Use them safely!

Laura Portugal (DUCC)
10th Stakeholders' Day
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What is DUCC?



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- A joint platform of European associations whose member companies use chemicals to **formulate** mixtures as finished products for end users, in particular consumers and professional users.



- DUCC focuses on the downstream users' needs, rights, duties and specificities under REACH and CLP

REACH and 'uses'



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$$\text{Risk} = \text{hazard} \times \text{exposure}$$

- The exposure has to do with the way that the substances are *used*
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 should be assessed by the registrants, as long as they are **identified uses** and ‘**endorsed**’ (covered) by the registrant
- The identified & covered uses will be communicated via the **Safety Data Sheet** – the main tool for communication in the supply chain
- The SDS were already common practice in chemicals’ trade and the *really* new element in the communication process since 2010 is the **exposure scenario** → **Extended SDS**
- The exposure scenario describes the **conditions for safe use of a substance**, i.e. conditions that result in a risk characterisation ratio < 1 after the risk assessment

Use reporting



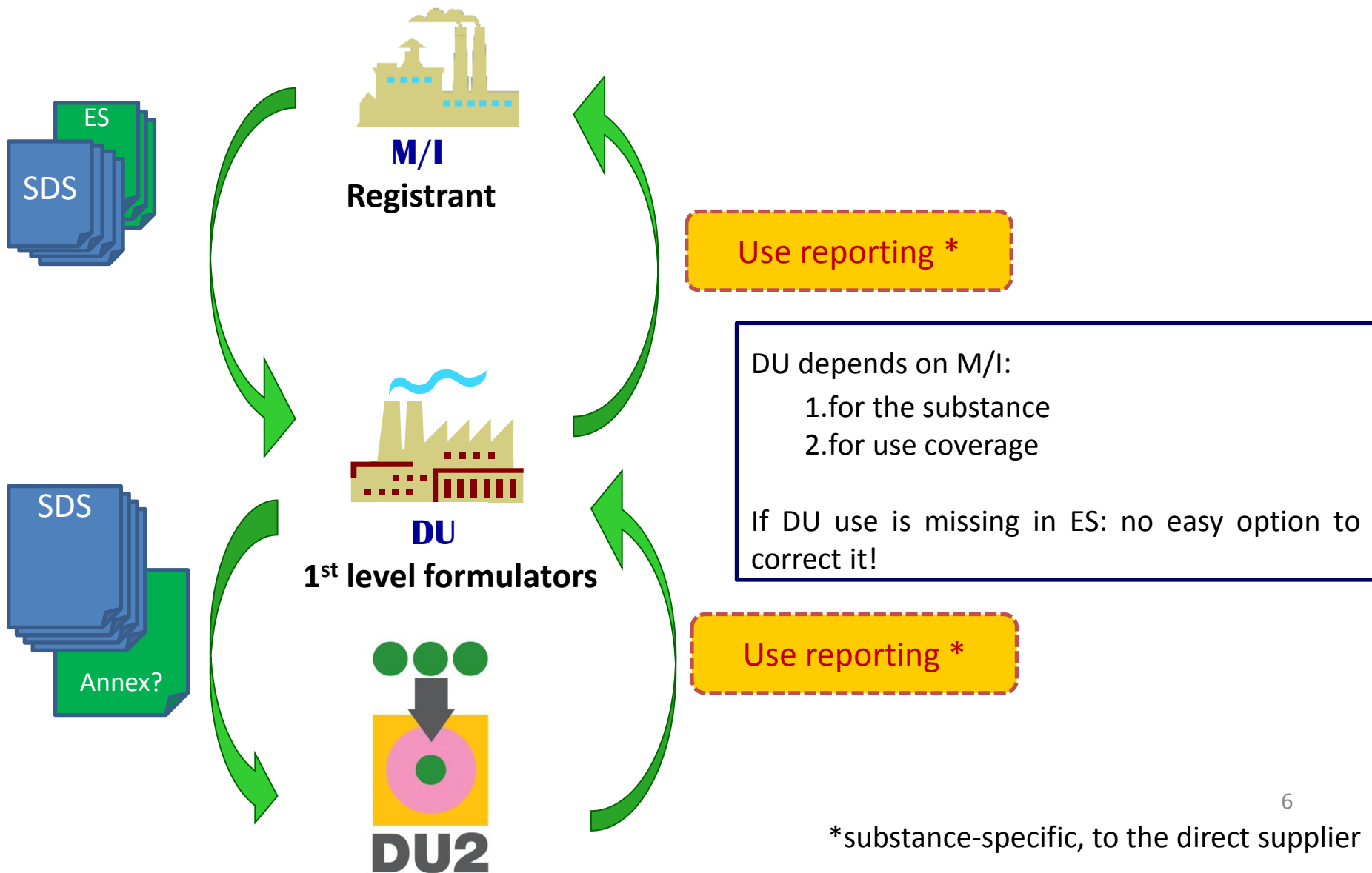
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- The way that a DU has to make its use known is to **report** it to the registrant
→ the possibility to make a use known is provided by REACH
 1. usually (and ideally) **before** registration
up to 12 months before registration deadline
art. 37(2)
 2. but still... possibility to communicate **after** registration,
upon receipt of an SDS where the use is not included
art. 37(3)

Use reporting



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1. Use reporting before registration (1)

Back in 2009, DUCC developed a template for its member associations to map and describe the most relevant uses for their respective sectors... in REACH language → the “UseR template”

- What is the “REACH language”?

It is the ‘use descriptors’, the ‘risk management measures’, the ‘operational conditions’ and other elements that may be needed by the registrants to perform the risk assessment, using the IT tools.

- How did the template look like?

It was a simple Excel file. It was designed to contain 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.

Number	Code	Short ES title	Short description of process or activity	Use descriptors						
				Sector of use (SU)	Process Category (PROC)	Product category (PC)	Product Sub-category	Article Category (AC)	Article Sub-category	Environmental Release Category (ERC)
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										
19										
20										



1. Use reporting before registration (2)

- **Who has filled the template?**

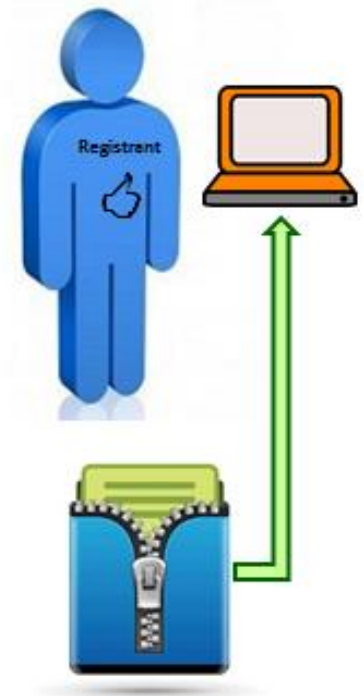
The sector associations have populated the template after discussions with their member companies.

The **sector use maps** were made available, for free, on their websites.

- **How were the sector use maps applied?**

Companies just needed to download the relevant use maps, either the formulators (to send it to their suppliers) or the registrants (to directly get the information).

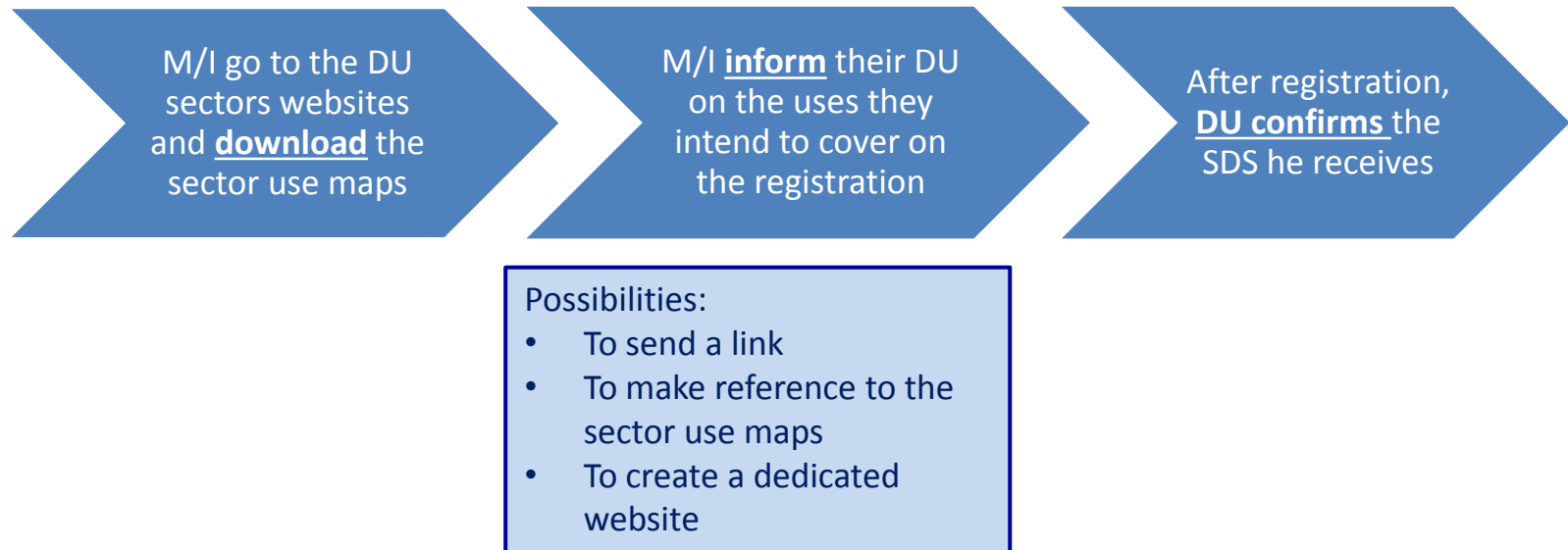
Preferred approach, agreed by industry in 2013 based on experience with 2010 registrations: **TOP-DOWN APPROACH**





1. Use reporting before registration (3)

The top-down approach

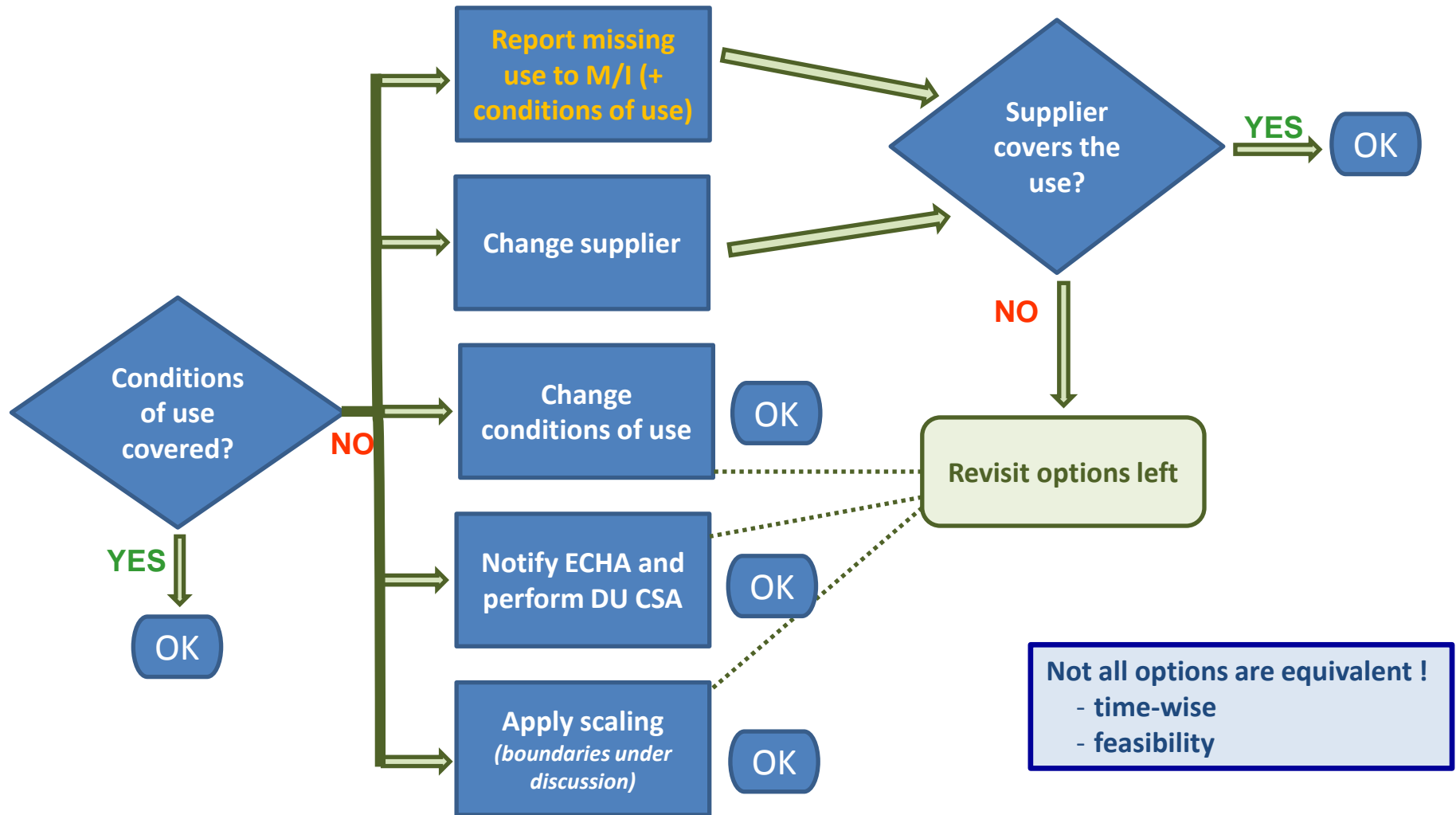


Avoidance of unnecessary communication

In principle this process works well for the **common uses**, i.e. the ones covered by the sectors in their use maps... but DU needs some **assurance** from his supplier! If the DU has a **particular use** which is not covered by the sector use maps → need to communicate upstream himself



2. Use reporting – after registration



Obs: This scheme illustrates the options for the DU when a use is not covered, which is not the topic of this presentation

DO's and DON'Ts for Use reporting



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DO's	
Before reporting	<input checked="" type="checkbox"/> Check current SDS – Section 1 (uses, indication of later registration or exemption)
	<input checked="" type="checkbox"/> Check supplier's website
When reporting (if needed)	<input checked="" type="checkbox"/> Contact supplier via indicated means (standard form, link, email, ...)
	<input checked="" type="checkbox"/> Substance + Supplier specific reporting (e.g. only uses applicable to a given mixture)
	<input checked="" type="checkbox"/> Use standard formats: Use maps template + Use Descriptors (R.12 ECHA Guidance)
	<input checked="" type="checkbox"/> Provide info on OC + RMM (as a minimum)

DON'Ts

When reporting	<input checked="" type="checkbox"/> Send tables with all possible combinations of uses/UD
	<input checked="" type="checkbox"/> Change the use descriptors prepared by Associations

Use maps – recent developments (1)



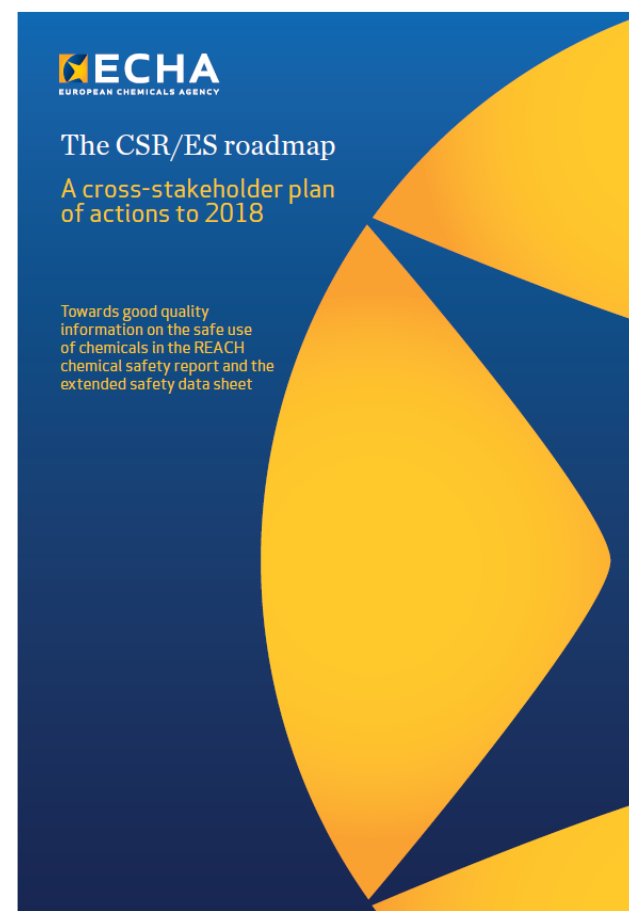
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In the last years there have been many initiatives bringing together industry, ECHA and Member State Competent Authorities

Exchange Network on Exposure Scenarios (ENES)

This collaborative network aims to identify good practices on preparing and implementing exposure scenarios, and to develop an effective communication exchange between supply chain actors to improve the protection of human health and the environment.

The network has been established by ECHA together with sector organisations Cefic, Concawe, Eurometaux, Fecc, A.I.S.E and DUCC to share knowledge, techniques and approaches to building and applying (REACH) exposure scenarios.



Use maps – recent developments (2)



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In the context of use reporting there is an ongoing project for developing an ‘improved’ use map template: Action 2.7. of the CSR/ES Roadmap



Main objective:

This action, in close relation with others, aims to provide tools for **refining / improving the quality** of the information used by the suppliers (registrants) which will consequently improve the quality of the information that DU receive for handling chemicals safely, i.e. the exposure scenario will be more realistic

Expected timelines:

- Template to be published mid-2016 (exact timing still under discussion)
- Other related templates and contents to be published end 2015/early 2016
- Industry sectors to create / update ‘improved’ sector use maps in 2016

Use maps – recent developments (3)



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Optional field

Standard use description + codes

Link to exposure info

Use identification and general description											Link activities to exposure assessment inputs						Additional information (optional)	
Use code	Link to entry in previous use maps	Life Cycle Stage	Use name	ESCom standard phrase code for use name	ES short title for communication (TBC)	Brief description of use process	Sector of use (SU)	Product categories (PC)	Article categories (AC)	This use leads to subsequent service life (Y/N)	Reference to subsequent service life use and relevant substances (if Y in previous column)	Contributing activity (CA) type	CA name	ESCom standard phrase code for CA name	Applies always (a)/optional(o)	CA descriptor	Exposure assessment input code for this CA	Generic composition by technical functions; maximum concentration per technical function; tonnage information
1	1a	2	3	3a	4	5	6	7	8	9	9a	10	11	11a	11b	12	13	14
sector_M_001_v1		Manufacturing					N/A	N/A	N/A	N/A	N/A	workers				from PROC List		
												workers				from PROC List		
												environment				from ERC List		
												environment				from ERC List		
sector_F_001_v1		Formulation or re-packing					N/A		N/A	N/A	N/A	workers				from PROC List		
												workers				from PROC List		
												environment				from ERC List		
												environment				from ERC List		
sector_IS_001_v1		Industrial site							N/A			workers				from PROC List		
												workers				from PROC List		
												environment				from ERC List		
												environment				from ERC List		
sector_PW_001_v1		Widespread use by professional workers							N/A			workers				from PROC List		
												workers				from PROC List		
												environment				from ERC List		
												environment				from ERC List		
sector_C_001_v1		Consumer				N/A	N/A		N/A			Consumers				from PC list		
												Consumers				from PC list		
												environment				from ERC List		
												environment				from ERC List		
sector_SL_001_v1		Service life - workers				N/A	N/A	N/A		N/A	N/A	workers				from PROC List		
												workers				from PROC List		
												environment				from ERC List		
												environment				from ERC List		
sector_SL_001_v1		Service life - consumers				N/A	N/A	N/A		N/A	N/A	Consumers				from AC list		
												Consumers				from AC list		
												environment				from ERC List		
												environment				from ERC List		

Obs: This template is still under discussion and may be changed



Benefits of using the Sector Use Maps

- Good use descriptions will lead to realistic conditions in the exposure scenario
- The uses are described in an harmonised way, agreed by the involved industry
- If the registrants cover the uses described therein they will be covering the uses of many downstream users
- The downstream users can use them for an internal mapping of uses
- If the registrants keep the coding of the sector use maps, the downstream users will recognise their used more easily
- The way that information is presented allows its automation (linked to the development of IT Tools like Chesar, ESCom,...)
- If correctly applied: will avoid unnecessary communication and limit the need for corrective action at DU level

QUALITY

HARMONISATION

REPRESENTATIVENESS

AUTOMATION



Closing remarks

- **Dialogue** in the supply chain is vital... but complex
- **Uptake** of use maps by registrants and **assurance** of their clients will smoothen supply chain communication
- Good supply chain communication and discipline will help in generating **realistic ES** and ultimately in delivering REACH safety objectives
- Keep an eye on the developments under the **CSR/ES Roadmap** and **ENES** activities: extended use maps will be ready to be used in view of upcoming registration deadline in 2018 and future updates
- Capitalise of all the **learnings** from previous deadlines and **tools** developed in the meantime

Useful links

- ENES – Exchange Network on Exposure Scenarios

<http://echa.europa.eu/en/about-us/exchange-network-on-exposure-scenarios>

- CSR/ES Roadmap - **Particularly activities under Action Area 2, inc. use maps**

<http://echa.europa.eu/csr-es-roadmap>

- ECHA's section for downstream users

<http://echa.europa.eu/web/guest/regulations/reach/downstream-users>

- Cefic Overview table of associations activities

This file includes very useful information regarding all activities done by the different sectors (e.g. use mpas, spERCs, SCEDs, etc...)

<http://www.cefic.org/Documents/IndustrySupport/REACH-Implementation/Guidance-and-Tools/Overview-associations-activities.xls>

<http://www.cefic.org/Industry-support/Implementing-reach/Guidances-and-Tools1/>

- Information on use communication (agreement for 2013 registrations)

Letter on use communication

http://www.ducc.eu/DownloadDocument.aspx?document_id=54

Fact sheet on use communication

http://www.ducc.eu/DownloadDocument.aspx?document_id=55

Thank you!



Laura Neto Portugal
laura.portugal@aise.eu
www.ducc.eu