REACH(ing) the WSSD 2020 goals

Break-out Group 2:

Supply chain communication

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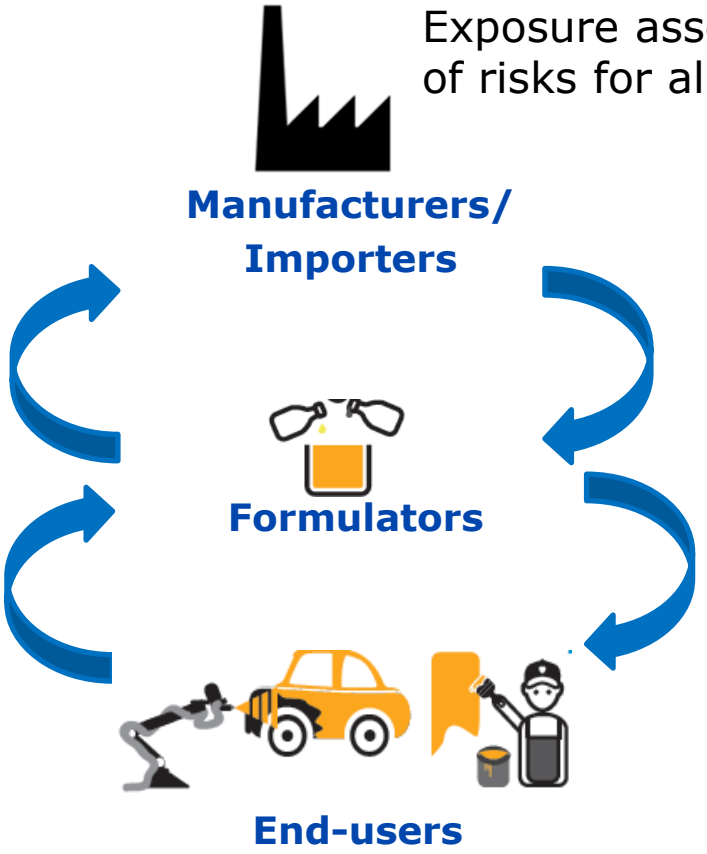
Main challenges in a nutshell

1. How to improve understanding (speaking same language) on what REACH means in terms of action needs and added value
   - Between various actors in the supply chain actors
   - Regarding production, marketing and use of substances, mixtures, articles
2. How to support those, at company or sector level, who must translate / distil all the REACH information into the essentials for meaningful risk management practices.
3. How to achieve that the communication cycle becomes self-sustained?

Information flow in REACH

Exposure assessment and characterisation of risks for all known uses



Information on uses and conditions of use *up the supply chain*

Helpful information on safe use *down the supply chain*

Use and Exposure information

Public

Registration Dossier

ECHA and Member States

chesar

Registrants

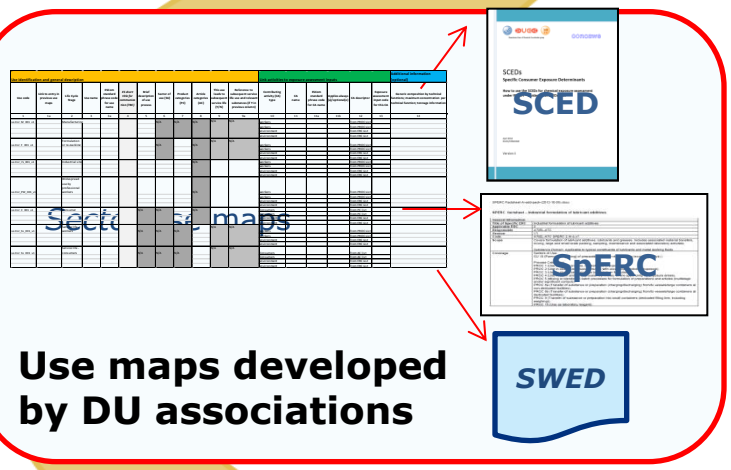
Templates ESCom

Exposure Scenarios received by individual DU

Formulators

SUMI

End users
Downstream users



Use maps developed by DU associations

Discussion items (adjusted to world cafe)

1. Improve information on use and exposure (along the supply chain) available to registrants as input to CSA? Should ECHA play a role here based on information generated by DU sectors? Includes DU understanding what the registrant needs (*combines 1 and 4*).

2. Create demand for quality safe-use-information; includes better understanding of (actor specific) needs (also needs under other legislation); potentially includes re-thinking of business model;

3. Ensure that information needed for safe use (hazard and risk management) is communicated through the supply chain down to end-users (in a relevant and understandable form); includes SDS for substances and mixture;

Discussion items (based on world cafe)

1. .
2. .
3. .
4. Build capacity among industrial/professional (end) users of chemicals for understanding and using the information received; make information as simple and relevant as possible; (*partly new*)
5. Networks like ENES supporting development and dissemination of methods suitable to enhance supply chain communication.
6. Set up more suitable communication concepts/methods regarding i) substances in articles and ii) substances (impurities) in recycled/recovered substances/materials (partly new); note: high significance for European economy;

Recommendation 1 (1)

How to improve the information on conditions of use along the supply chain becoming available to 2018 registrants?

Why: Basis for registrants to carry out a proper CSA + basis for DU receiving meaningful and manageable information coming down the chain.

Technical/conceptual solution: available

Challenge: Make companies/sectors investing in implementing the machinery (using the information)

Recommendation 1 (2)

Recommendations:

- ENES community to explain the incentives/benefits at level of the different actors
  - Incentives for DU (end-users, formulators)
    - get the own use (and those of the customers) covered in 2018 registration (continue business)
    - get manageable information with the SDS; get simple safe use information for mixtures;
    - get relevant/useful information (avoid health and safety issues, reputation)
    - Make DU (end users) understand the consequences of too conservative exposure assessments.

Recommendation 1 (3)

- Incentives for registrant
  - Knowing the customer of the customer (expand knowledge on existing applications, potential markets)
  - Avoid being hit by scrutiny (for the wrong reasons); being ready for all REACH follow up process; being able to advice against uses;
  - Link dossier correctness and maintenance under REACH to *responsible care* commitment
  - Being ready for SDS/ES inspection by authorities
  - Being awarded for being a good player (good quality dossier; good quality safe use information)
- Depending on business model, safe use information may get part of the business (e.g. metal parts cleaning, vehicle coating)

Recommendation 1 (4)

- DU Sector organisations get active to generate use map information to characterise uses/use conditions in the markets of their membership
- Appoint person at company level to translate exposure scenario information into instruction for operators
- National authorities (helpdesks, inspectors) to more intensively educate/inform SME DUs not belonging to an active sector organization; raise awareness on potential business problems if staying passive.

Recommendation 2 (1)

How to translate exposure scenario information for substances into safe use information for mixtures?

Why: Key step to make the output from the registrant's Chemical Safety Assessment travel to the end-users of chemicals

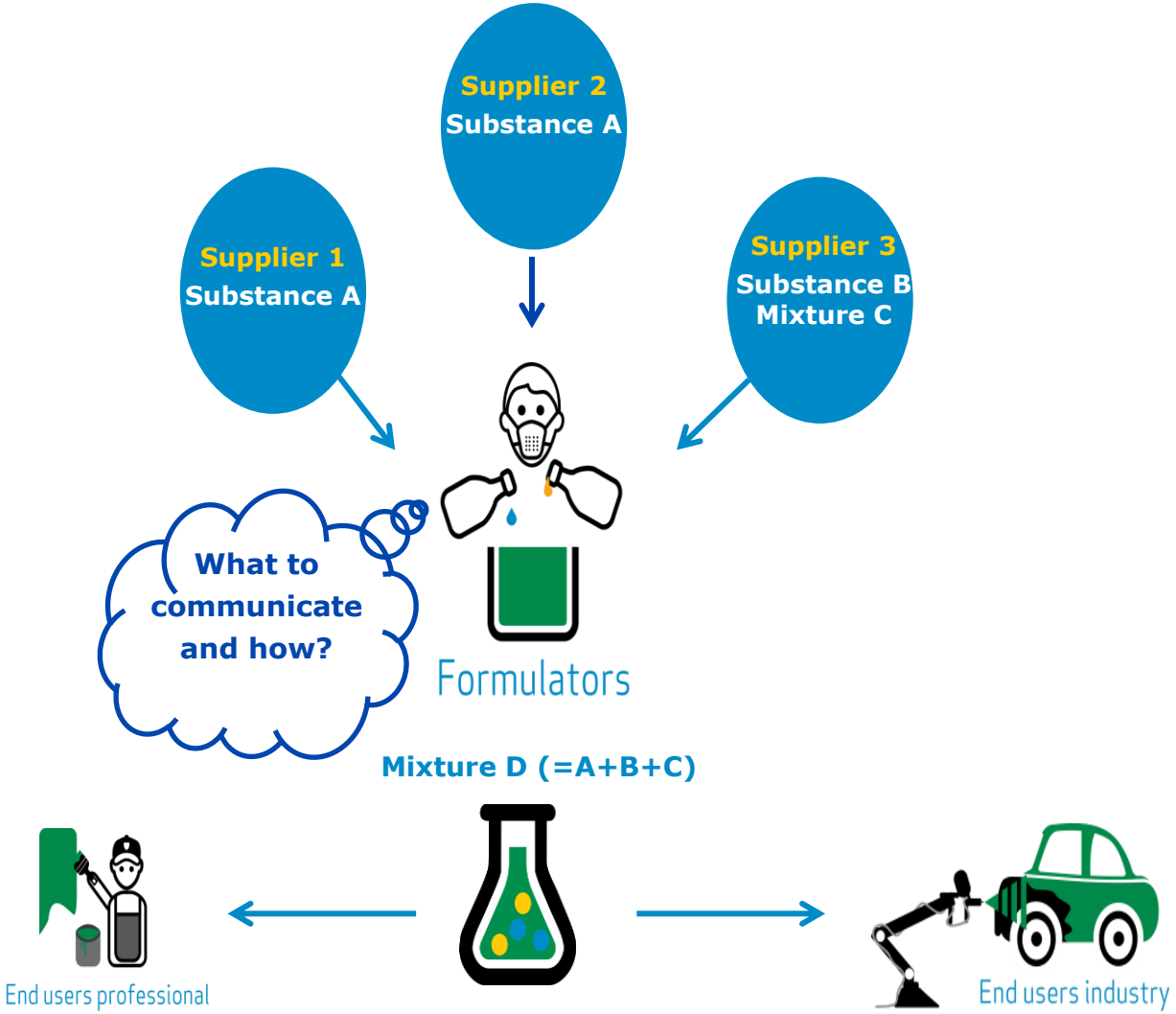
Technical/conceptual solution: available

Challenge: Not implementable as stand-alone solution; implementation in markets without active sector organisation; use by SME formulators

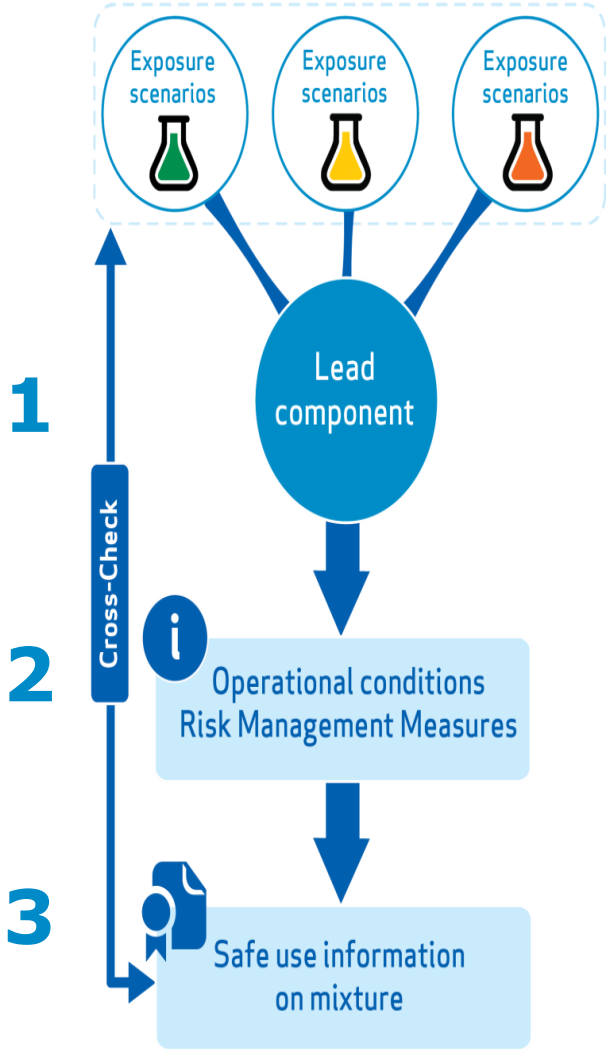
Methods

- The methods developed under CSR/ES Roadmap are ready for implementation by industry:
  - Lead Component IDentification methodology (LCiD)
  - Safe Use of Mixtures Information (SUMI)

Formulating mixtures for end users

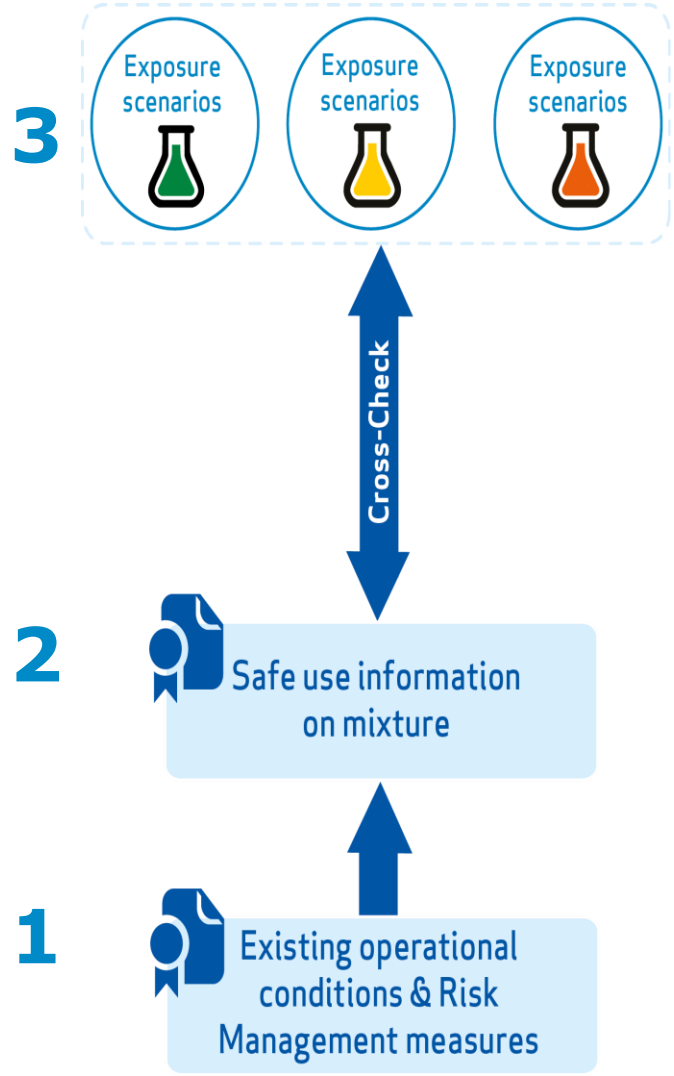


What to communicate – Top down approach



1. Lead component for various routes of exposure is identified (methodology developed by industry sectors).
2. This identifies which OC/RMMs to communicate.
3. This is communicated as safe use information on mixture.

What to communicate - Bottom up approach



1. Existing conditions of safe use are identified within sectors.

2. Provided as **S**afe **U**se of **M**ixtures **I**nformation (SUMI):
   1. Harmonised template
   2. Uses clear language, pictograms, in sector terminology.

3. Formulator cross checks that use is covered by supplier ES.

Note: *Registrants have received the information on the conditions of use for the mixtures via SWEDs, SCEDs and SpERCs)*

Safe Use of Mixture Information (SUMI)

Mandatory SUMI content

SUMI: Safe Use of Mixtures Information for end-users	**Sector logo**

Sector_SUMI_code: Title of SUMI

General description of process covered
May include use descriptor codes or reference to SWED

Operational Conditions

Maximum duration:	*xx min.*
Other:	*xxx*

Risk Management Measures

Required RMMs, use of pictograms

Reference to Section 8 of SDS for RMM specifications

If applicable: any environmental measures

Disclaimer

Disclaimer on boundaries of SUMI use

Sector_SUMI_code / version number

Optional SUMI content

Good practice advice

If relevant, applicable (sector-specific) good practice advice

Use of pictograms when available

Additional information on product composition

To include references to other relevant sections of SDS or product label

Sector_SUMI_code / version number

NOTE: This format is still subject to (minor) editorial changes.

Recommendation 2 (2)

- The roll out and implementation of the solutions depends on the use maps. Start information cycle by generating use maps for 2018, based on which registrants can then communicate back.
- The SUMI approach is well integrated with the use map concept:
  - Formulating sectors define for their markets the conditions of (safe) use for the different types of mixtures.
  - The registrants check hazard profile of the substance they supply against these conditions of use.
  - SUMIs have started to be used in practice
- National authorities will still need to support SME formulators with no access to active sector organisations.

Further considerations (2nd breakout)

1. How to activate/push downstream user sectors to provide the use & exposure information and get the outcome they want?
   - List those sectors that need attention: Who are they (and why)? Understand why they're not engaged?
2. What role can COM, ECHA, other actors play in activating sectors?
3. What incentive / reward approaches to recognise "good dossiers / information"?
4. How to make the communication cycle self-sustaining?
5. Any other points/clarity identified?

Recommendation 1 (5)

Activate other sectors; create self-sustaining communication cycle

- Success stories. Realistic illustrations on what can go wrong.
- Join DUCC; explain positive experience to other sectors
- Use ambassadors "accepted/respected" in an audience (industry ambassadors potentially in combination with authorities); "local" face to face meetings beneficial.
- Find out barriers
  - Capability/qualification; sector organisation depend on company experts
  - Lack of resources to invest in use map population. Needs management support.
  - Absence of consumer products in sector.
  - Difficult for newcomers to pick up.
  - Lack of registrants' demand

Recognition: awards as incentives?

- Recognition of good work: image, visibility & reliability are important. Competitive advantage.
- Awards less important than other benefits. E.g.
  - Duration of authorisation granted.
  - Duration of transition period to implement RMMs.

Recommendations 1 (6)

- ENES/Roadmap to work out a strategy how to make the machinery used. Some examples to think through:
- Pilot project with DUCC to generate a success story; illustrate how the machinery works; also exemplify how the description of use conditions looks like.
- Present the tool set and its benefits (e.g. webinar, video)
- Describe the typical project phases of a successful project to implement the tools (e.g. how to set up a use map).

Recommendations 1 (7)

- Catalogue of best practice examples on successful supply chain dialogue (facilitated by ECHA)
- Illustrative cost reduction potential; illustrate avoiding business problems.
- Surveys on quality of safe use information in the supply chain to identify best practice (discussion on practicalities not concluded).
- Specific role of ECHA: trustworthy source of recommendations on tools.