

Communication in the Supply Chain: Obligation and advice for downstream users

Eighth Stakeholders' Day

26 March 2013

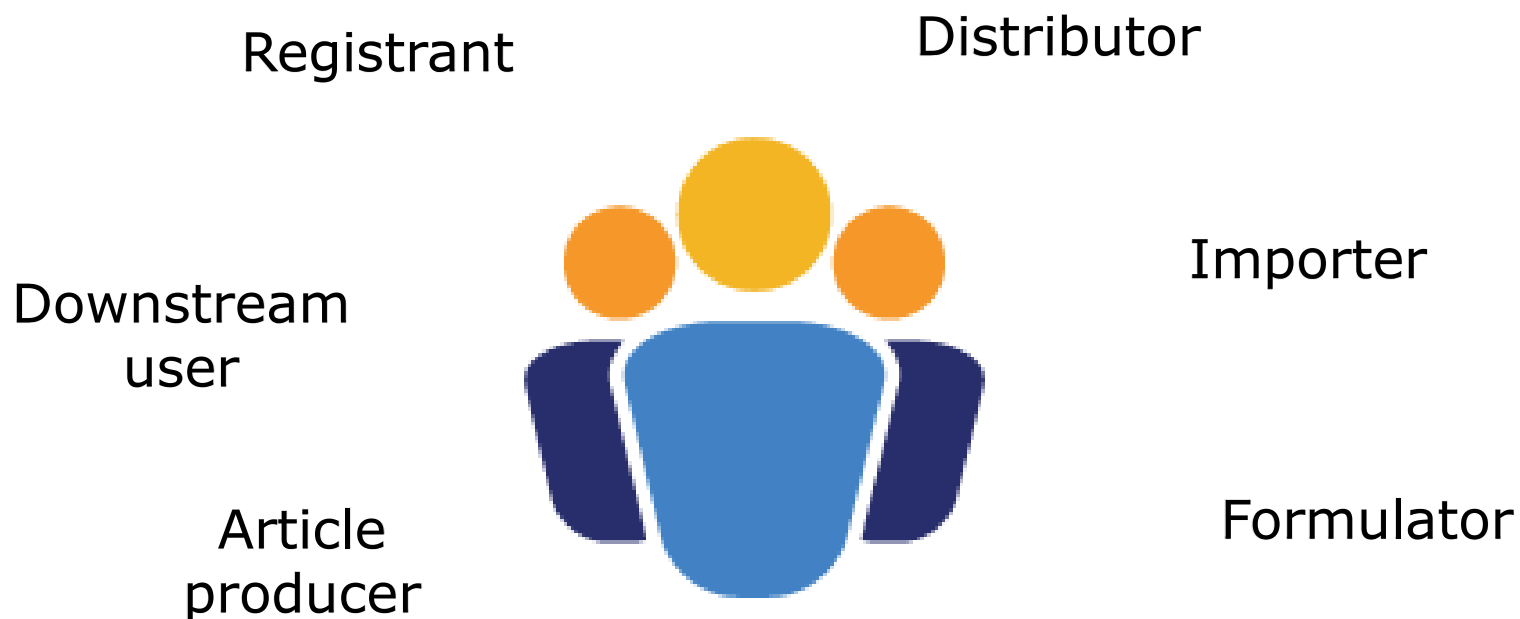
Bridges Ginnity

Senior Scientific Officer

European Chemicals Agency

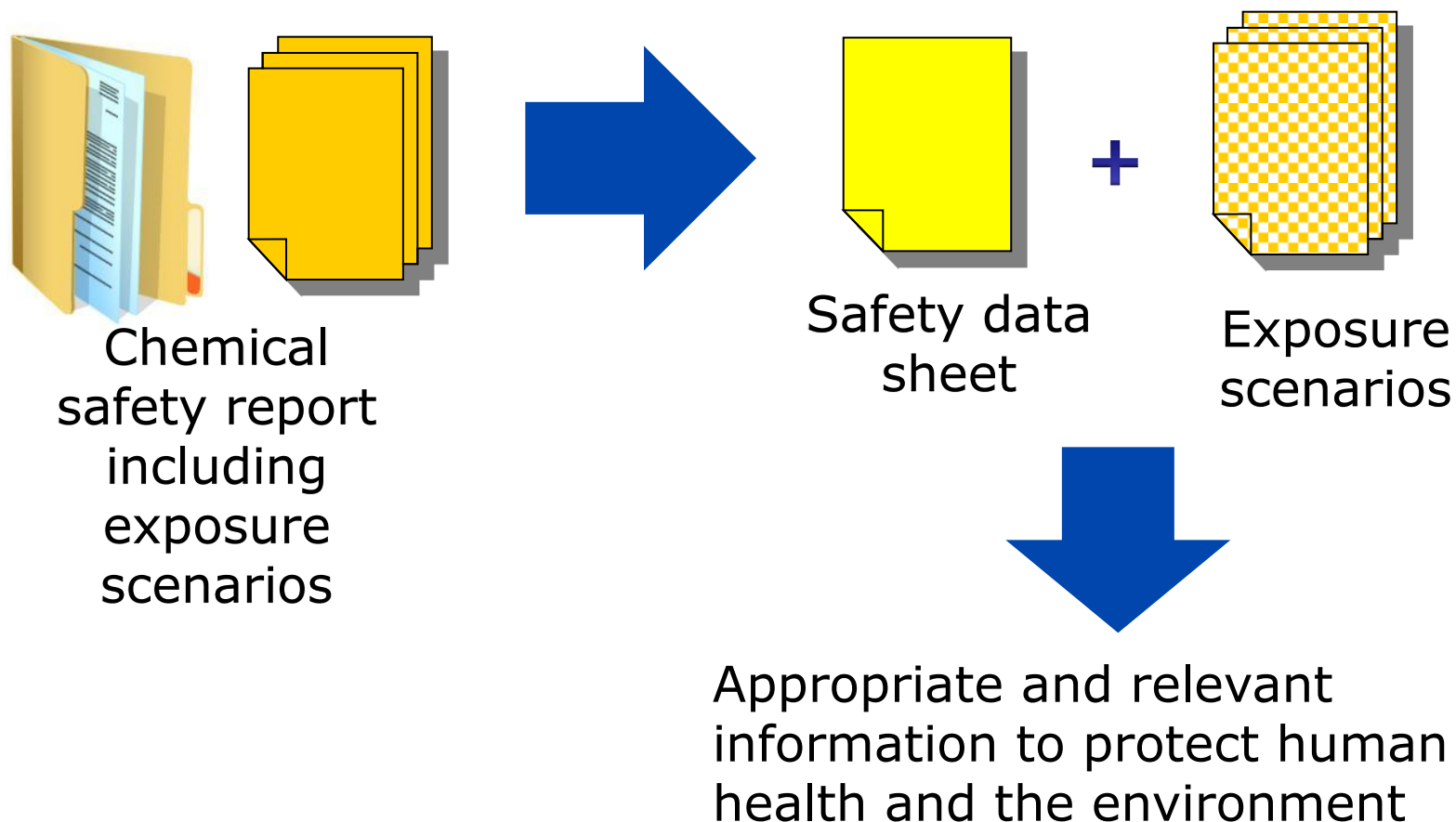


Communication in the Supply Chain



Most actors play more than one role

Key elements for good communication

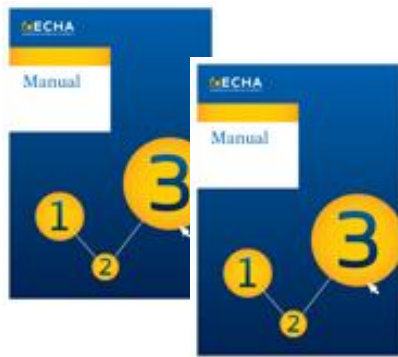


What promotes good communication in exposure scenarios?

- Harmonisation of:
 - Content
 - Phrases
 - Structure/format
- Realistic operational conditions and risk management measures

Support is available to help improve the quality...

Improving quality of chemical safety report - Illustrative example CSR



- Part 1: General advice (8 pages)
- Part 2: Worked example of chemical safety report
- Part 3: IUCLID dataset for chemical safety report
- Part 4: Chesar dataset for generating CSR

Improving quality of exposure scenarios – ENES

Exchange Network for Exposure Scenarios



ENES4 - 16-17 May Helsinki

<http://echa.europa.eu/enes>

ENES: Exchange Network for Exposure Scenarios – some topics covered

- Harmonisation
 - Table of contents for the ES-Annex
 - Format for exposure scenario for communications
 - Content of exposure scenarios
 - Standard phrases (ESCom)
 - Downstream user use mapping
- Chemical safety assessment
 - Realistic risk management measures
 - Development of release estimates for environment and consumers
 - Mixtures - presentation of industry solutions
 - Scaling - discussion of key issues

Hot topics for downstream users

- Mixtures
- Scaling
- Downstream user chemical safety report
- Downstream user reporting
- Authorisation



Hot topic: Mixtures – the challenge for formulators



1. Consistent information from suppliers regarding substances and uses
2. Consistent approach for identifying information to communicate
3. Consistent approach to communicating this information

Hot Topic: scaling

What is scaling?

A mathematical approach to determining if the actual conditions of use on a downstream user site are still covered by the exposure scenario, when the conditions of use differ

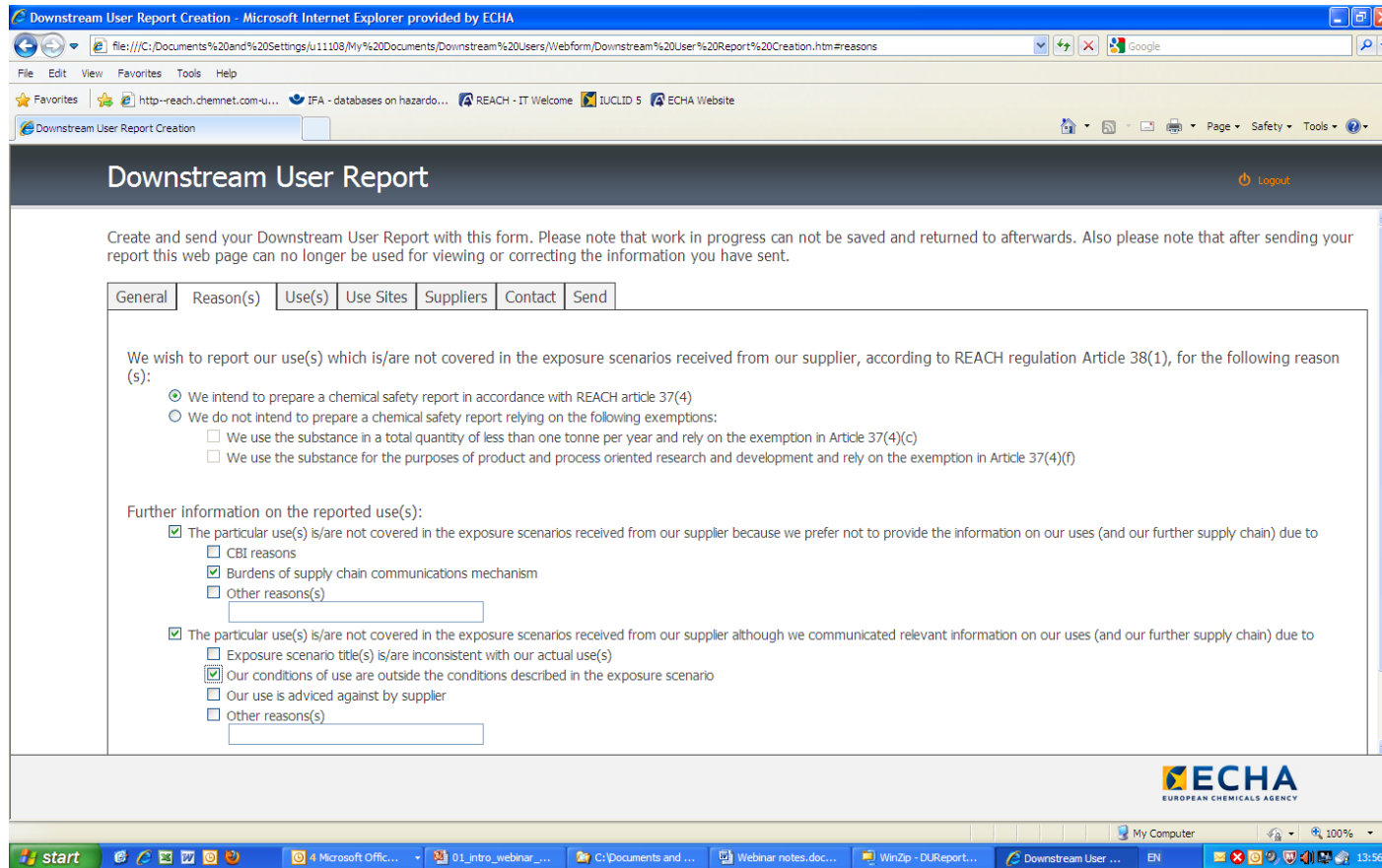
- **Legal background**
 - Article 37(4) requires that the exposure scenario is implemented “as a minimum”
- **Key discussion point**
 - Can I modify the conditions of use such that the risk characterisation ratio (RCR) is increased above the value in the CSR, but is still below 1?
- **Reason exposure level should not be increased**
 - Aspects the registrant considered regarding combined exposure may be overlooked by the downstream user
 - ECHA relies on information from CSR’s for key REACH processes. This should reflect actual conditions of use, or deviations reported by downstream users
- **Current status**
 - Information on how to use scaling is described in DU guidance under review

Hot Topic: Downstream user CSR and DU reporting

- DU CSR is **NOT** the same as a registrant's CSR. It usually:
 - Excludes hazard assessment
 - Focuses on one/few, well known uses
- Article 38(4) clarification – report only if your classification differs from all of your suppliers
- Downstream user reporting has been made easier with webform



Downstream user – webform reporting



Downstream User Report Creation - Microsoft Internet Explorer provided by ECHA

file:///C:/Documents%20and%20Settings/Ju11108/My%20Documents/Downstream%20Users/Webform/Downstream%20User%20Report%20Creation.htm#reasons

File Edit View Favorites Tools Help

http-reach.chemnet.com-u... IFA - databases on hazardo... REACH - IT Welcome IUCLID 5 ECHA Website

Downstream User Report Creation

Logout

Downstream User Report

Create and send your Downstream User Report with this form. Please note that work in progress can not be saved and returned to afterwards. Also please note that after sending your report this web page can no longer be used for viewing or correcting the information you have sent.

General Reason(s) Use(s) Use Sites Suppliers Contact Send

We wish to report our use(s) which is/are not covered in the exposure scenarios received from our supplier, according to REACH regulation Article 38(1), for the following reason(s):

- We intend to prepare a chemical safety report in accordance with REACH article 37(4)
- We do not intend to prepare a chemical safety report relying on the following exemptions:
 - We use the substance in a total quantity of less than one tonne per year and rely on the exemption in Article 37(4)(c)
 - We use the substance for the purposes of product and process oriented research and development and rely on the exemption in Article 37(4)(f)

Further information on the reported use(s):

- The particular use(s) is/are not covered in the exposure scenarios received from our supplier because we prefer not to provide the information on our uses (and our further supply chain) due to
 - CBI reasons
 - Burdens of supply chain communications mechanism
 - Other reasons(s)
- The particular use(s) is/are not covered in the exposure scenarios received from our supplier although we communicated relevant information on our uses (and our further supply chain) due to
 - Exposure scenario title(s) is/are inconsistent with our actual use(s)
 - Our conditions of use are outside the conditions described in the exposure scenario
 - Our use is advised against by supplier
 - Other reasons(s)

ECHA
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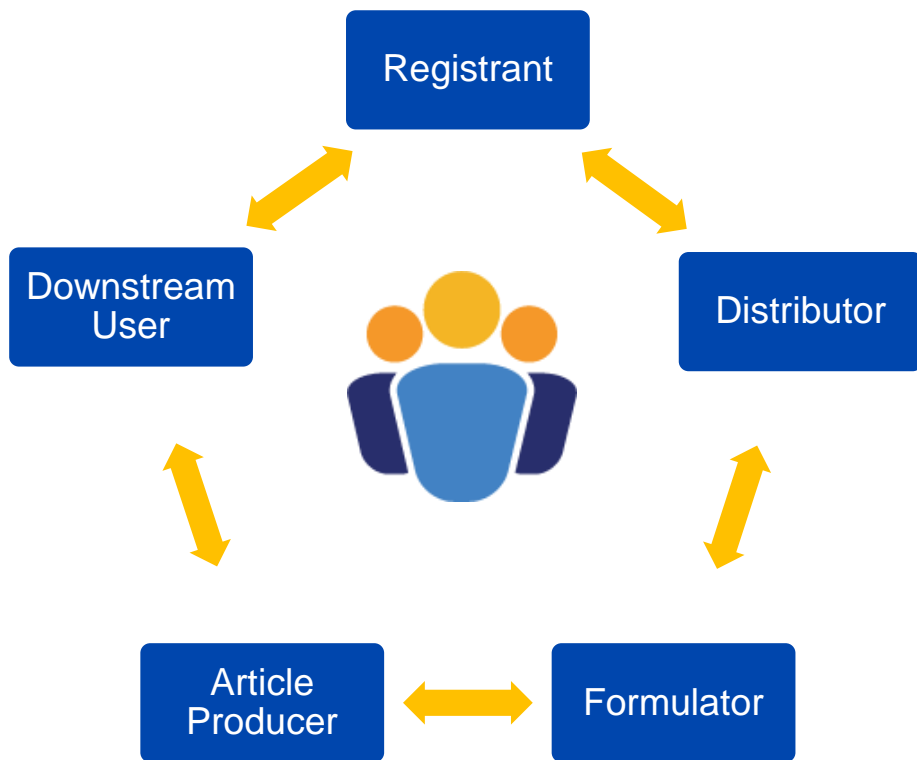
Webinar on 8 April 2013 on how and when to report to ECHA

Hot Topic: Authorisation



- Advice for downstream users
 - Be aware if substance is on the Candidate List or Authorisation List
 - Check if actor upstream is applying for authorisation
 - If yes, check your use is covered by the authorisation application of your supplier. Notify ECHA within three months of first supply
 - If no, decide whether to apply for authorisation yourself or seek alternatives
 - When authorisation is granted, comply with conditions of use

Key message summary



- Good communication in the supply chain
 - Saves time
 - Saves money
 - Can be good for business
 - Protects human health and the environment

Thank you

