

## Webinar on “Use maps - how downstream users and registrants can benefit” of 15th June 2016

### Summary of question and answer panel

Participants to the webinar had the opportunity to pose questions on the topic to ECHA colleagues and the questions and answers are summarised here. Where appropriate, similar questions were merged and the answers were expanded and clarified. Questions not directly relevant to the topic of the webinar were excluded.

The webinar can be seen at [https://echa.europa.eu/view-webinar/-/journal\\_content/-56\\_INSTANCE\\_DdN5/title/use-maps-how-downstream-users-and-registrants-can-benefit](https://echa.europa.eu/view-webinar/-/journal_content/-56_INSTANCE_DdN5/title/use-maps-how-downstream-users-and-registrants-can-benefit). For further questions, please contact your national helpdesk or ECHA at <https://www.echa.europa.eu/support/helpdesks/>

1	<p><b>Is there an available list of sector organisations?</b></p> <p>Many sector organisations are ECHA accredited stakeholders. For a list, see <a href="http://echa.europa.eu/about-us/partners-and-networks/stakeholders">http://echa.europa.eu/about-us/partners-and-networks/stakeholders</a>. The Cefic and DUCC websites provide information on members / affiliates. Listings of national sector organisations are often provided by organisations such as chamber of commerce</p>
2	<p><b>What sector organisations are generating use maps?</b></p> <p>CEPE (coatings and paints), AISE (detergents and cleaning products), FEICA (adhesives), EFCC (construction chemicals), I&amp;P (imaging and printing), Fertilisers Europe and Cosmetics Europe are currently generating use maps. DUCC coordinates these activities, which are undertaken on a Europe-wide rather than national level.</p>
3	<p><b>Will use maps be available on the ECHA website? And if so, when?</b></p> <p>Updated use maps including SCEDs, SWEDs and SPERCs from sectors will be made available at <a href="http://echa.europa.eu/csr-es-roadmap/use-maps">http://echa.europa.eu/csr-es-roadmap/use-maps</a>. We anticipate these will become available from sectors during the second half of 2016. Meanwhile an overview table of use maps generated for previous registration deadlines is available at: <a href="http://www.cefic.org/Industry-support/Implementing-reach/Guidances-and-Tools1/">http://www.cefic.org/Industry-support/Implementing-reach/Guidances-and-Tools1/</a></p>
4	<p><b>Will SCEDs, SWEDs and SpERCs (published on ECHA website) be reviewed by ECHA staff? If not do you envisage a disclaimer explaining that such data may be challenged during evaluation processes?</b></p> <p>The responsibility for the content remains with the author of the information. ECHA will not be “approving” the content and the use maps will be posted as soon as they are available. However ECHA will work with industry to promote alignment and harmonisation, with feedback given as appropriate. The registrant remains responsible for the resulting registration dossier. This will be explained on the webpages.</p>
5	<p><b>Will a workshop be organised to show everyone how to apply this work in a more practical way?</b></p> <p>A workshop was held on 12 May 2016 and the material is available at <a href="http://echa.europa.eu/news-and-events/events/event-details/-/journal_content/56_INSTANCE_DR2i/title/enes-workshops-on-sector-use-maps-and-spercs">http://echa.europa.eu/news-and-events/events/event-details/-/journal_content/56_INSTANCE_DR2i/title/enes-workshops-on-sector-use-maps-and-spercs</a>. We will keep the need for further workshops under review. ENES will continue to be the platform for exchanging feedback and experiences.</p>

6	<b>Will it be possible to automatically incorporate use maps into Chesar 3? If so, where can I find the files?</b>
	Yes. The facility to generate Chesar 3 files for use maps is already available, with the exception of SWEDs which is under development (see page 13 of the Chesar user manual). It is expected that the use maps in Chesar importable formats will be available on the ECHA website for all registrants for download and import.
7	<b>In which languages are the ES generated by Chesar?</b>
	At present, the ES is generated in English only. The ES for communication is generated on the basis of standard phrases and for automated translation, these phrases need to be available in other languages. We are not aware of any multi-lingual phrase catalogue but would seriously consider providing a translation facility if such a catalogue is available.
8	<b>Why are all these guidance, templates &amp; tools available only for 2018 registration deadlines?</b>
	Use maps were developed for the first registration deadline, and are not a new concept. It was agreed among stakeholders to develop and extend their implementation for the 2018 registration. The templates have been revised and the use maps are being updated to support the information required on use and exposure in the CSA and ES.
9	<b>I am a registrant. What if I have registered a substance with uses for which a use map comes available? Do I need to update my CSR?</b>
	Use maps may provide new or refined information on use. A registrant can review them and decide what needs updating, as required by REACH Art.14(7) and Art.22. You may want to compare the uses as characterised and assessed in your CSR with the information becoming available with the use map. There may be various reasons to update the CSR, e.g. missing uses in your CSR; unrealistic conditions of use. If the CSR has been developed jointly by all co-registrants, it is encouraged that this is discussed in the SIEF.
10	<b>What must we do if some of our uses are not included in the ES we receive but the registrant refuses to update the ECHA dossier?</b>
	If the registrant doesn't cover the use, you can look for another supplier who would cover it or conduct a DU CSR to assess the use yourself. Please refer to the DU guidance for more explanation of the options: <a href="http://echa.europa.eu/documents/10162/13634/du_en.pdf">http://echa.europa.eu/documents/10162/13634/du_en.pdf</a> .
11	<b>Will the related SUMI s also be available on the ECHA website, together with the use maps?</b>
	Generation of SUMIs is underway by several sector organisations and these will be available on the sector websites. It has not been considered yet if an overview or links will be provided from the ECHA website. The SUMI template is available on the DUCC website at <a href="http://www.ducc.eu/Publications.aspx">http://www.ducc.eu/Publications.aspx</a> .
12	<b>Does a formulator have to use the SUMI template?</b>
	No. The SUMI is a template developed by sector organisations and has no mandatory status. For a mixture, the formulator can choose to forward the information from received ES in several ways - the individual ES, a consolidated sheet (such as a SUMI or similar) or incorporated in the main body of the SDS. SUMI templates are good practice identified under ENES. The benefits of standardisation have been recognised by all stakeholders at these meetings.

13	<p><b>Does the SUMI have to be provided in the languages of the member states? If so, who translates it?</b></p> <p>Yes. When a SUMI or equivalent document is provided as part of the safety data sheet it needs to be in the official language of the Member State of the recipient. The supplier is responsible for this.</p>
14	<p><b>Could we consider that SUMI is a kind of "extended SDS" for mixture?</b></p> <p>The SUMI is one way of communicating the relevant information from the incoming exposure scenarios. The SDS/SUMI is similar to the SDS/ES, also called an extended SDS. The same legal requirements apply as for exposure scenarios.</p>
15	<p><b>Does a SUMI have to be generated for plant protection end- products, biocidal end-products or consumer products?</b></p> <p>No. When plant-protection/biocidal active substances and co-formulants are regarded as REACH registered, an exposure scenario (ES) attached to the SDS is not required for the ingredient substances. Consequently a SUMI or equivalent way to communicate information from ES does not apply to the end-products. A SDS should be provided however if applicable. Regarding consumer products, an SDS is not required to be provided to consumers, therefore ES or SUMI or equivalent is not required either.</p>
16	<p><b>What are the consequences for the supplier if the customers don't comply with SUMI 's information?</b></p> <p>Consequences are always a matter for national enforcement authorities. The DU customer who receives an exposure scenario, SUMI or equivalent is responsible for implementation of the control measures. However, an important responsibility for suppliers is the communication of information to enable downstream users to meet these responsibilities. To achieve this, it may be appropriate for a supplier to take action if they are aware of unsafe use by their customers.</p>
17	<p><b>Is there a standard questionnaire that can be used by sector organisations when collecting information from members in order to generate use maps?</b></p> <p>No. Sectors joining the initiative may however benefit from experience of other sectors. Platforms such as DUCC and the ENES meetings provide an opportunity for this kind of collaboration.</p>
18	<p><b>Based on explanation given, the use maps is not for specific substances. What does it describe in term of typical uses? Typical industrial uses? Typical uses for end-product in which the substance is contained?</b></p> <p>Correct, use maps are use specific and not for specific substances. Their aim is to give an overview of the common/typical uses of products in a sector at all relevant life cycle stages. Some examples are in the use map template at <a href="http://echa.europa.eu/documents/10162/15669641/use_maps_template_en.xlsx">http://echa.europa.eu/documents/10162/15669641/use_maps_template_en.xlsx</a></p>
19	<p><b>SpERCs provide release factors for the registrant, so the same release factors will appear on the ES provided by the supplier. So there is no need for the downstream user to check if the release factors are respected for his use?</b></p> <p>The SPERC is expected to contain a description of the conditions of use that ensure that the release factor is met. Those conditions of use should be part of the ES you receive and you should check that you comply with them</p>
20	<p><b>As a DU I do not know yet if I need to start the process, or if my sector association or my suppliers will do it. Do I need to create these reports for any product I use?</b></p> <p>We suggest you to contact your sector association to clarify its intentions regarding the development of use maps. As a DU, you may be interested in participating in the development of your sector use maps.</p>

