

Risk management – get ready

Tenth Stakeholders' Day

27 May 2015

Jack de Bruijn
Director of Risk Management
European Chemicals Agency



Risk management

- **How to help yourself**
- **What authorities are doing**
- **Stay ahead of the game**



**Company risk
management depends
on supply chain
communication**

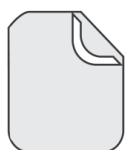


Communication in the supply chain

Registrants



Registration dossier



Chemical Safety Report
Exposure Scenarios



Safety Data Sheet Exposure Scenarios

Sector use maps

Substance	Use	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses
Substance 1	Use 1	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses
Substance 2	Use 2	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses
Substance 3	Use 3	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses
Substance 4	Use 4	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses
Substance 5	Use 5	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses	Information on uses



Information on uses



Safety advice

Downstream users/sector organisations

Help is there



Information on uses

- Guidance, tools and **sector use maps** for chemical safety assessment (CSA)
- Harmonised communication of exposure scenarios (ES)

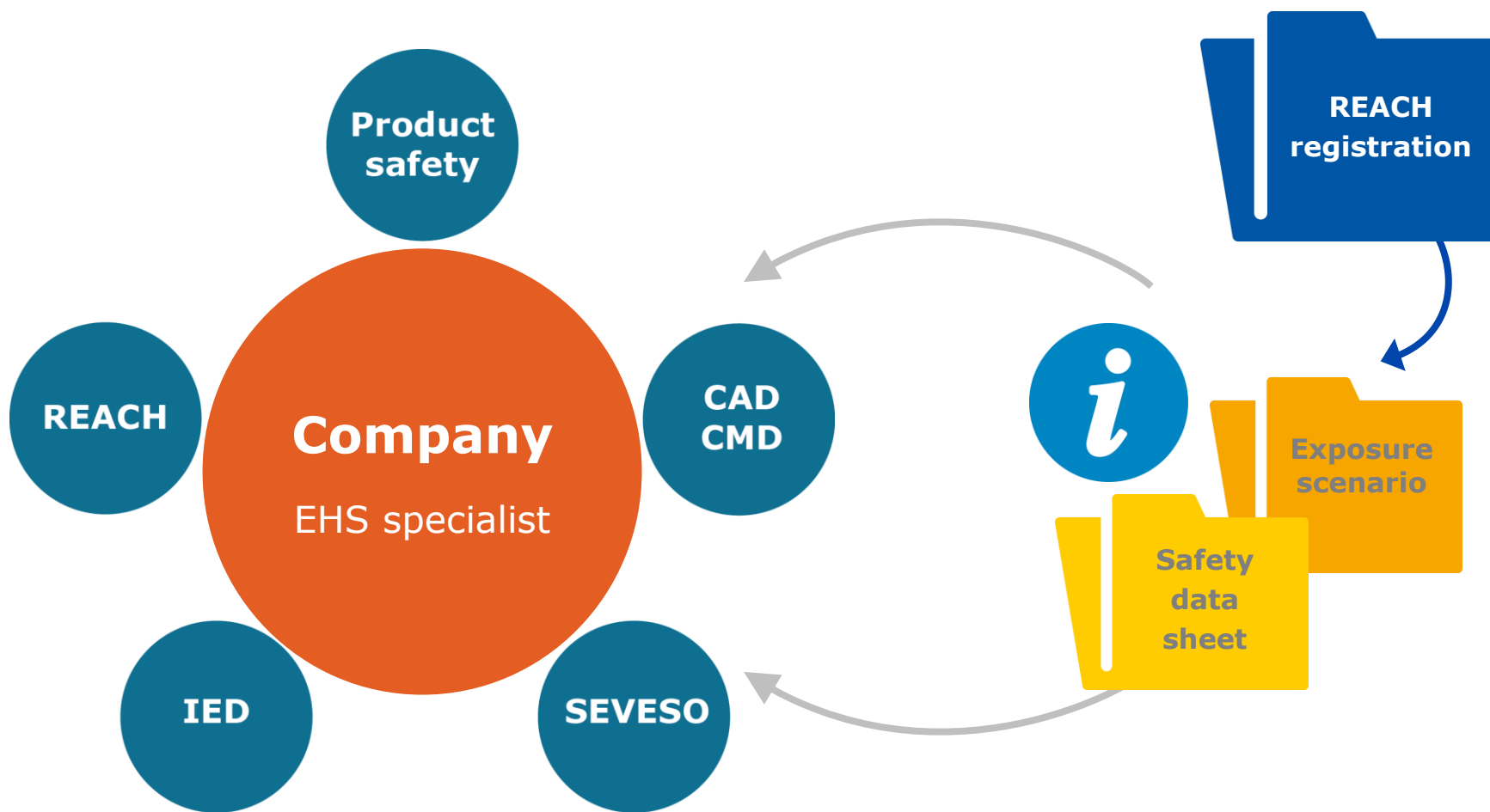


Safety advice

- Build on existing risk management advice, such as control sheets
- Help formulators provide realistic and relevant safe use information for mixtures
- Use REACH information for other purposes

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

Making use of REACH in your company



Stay ahead

- Apply the solutions built on experience from the past years – make communication on conditions of use more efficient and more helpful
- Follow the CSR/ES Roadmap activities
 - Work with your sector associations, we need more “end” use sectors to become involved
 - Join in the projects, contact us where needed
- Raise awareness on REACH and the information it brings
 - Integrate REACH into company safety, health and environment systems

Regulatory risk management

What authorities are doing



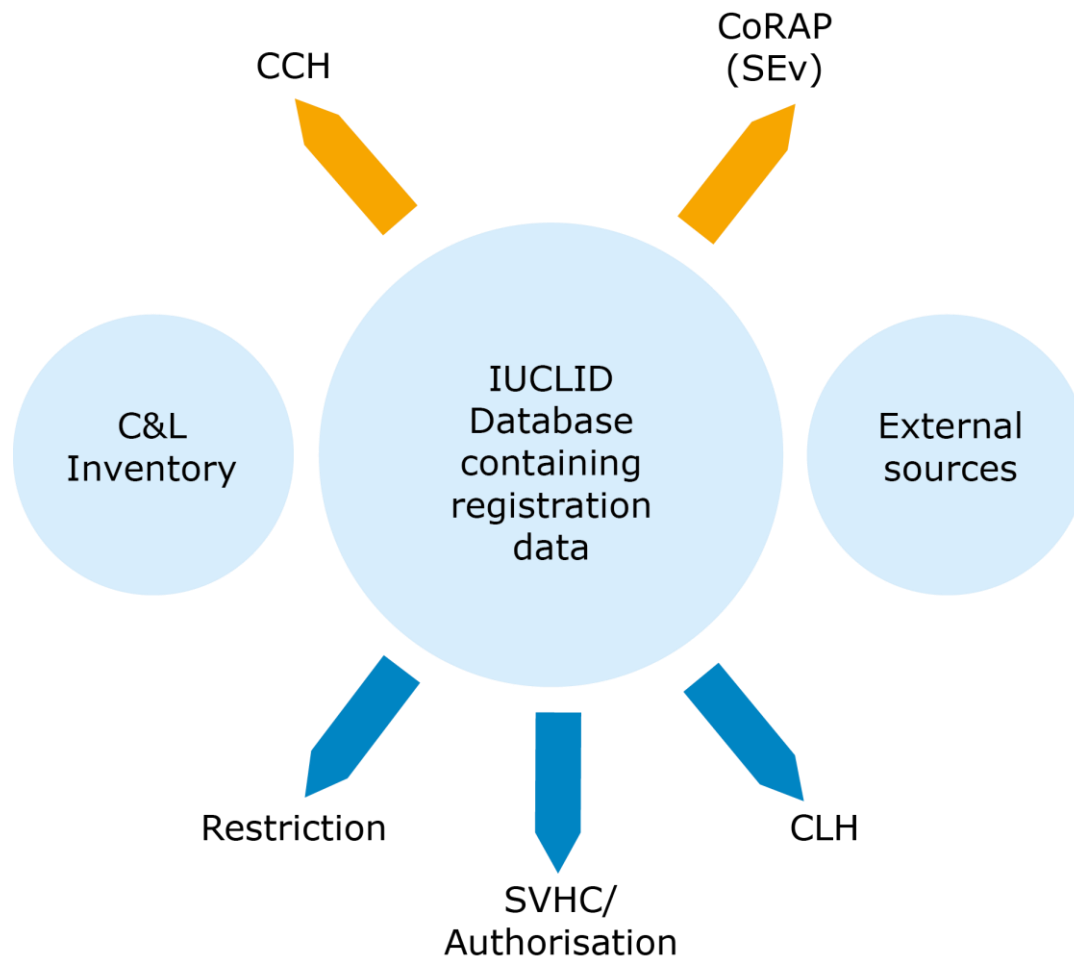


Priorities

Focus on substances that have the biggest impact on health and the environment

- High potential for exposure of humans or the environment
- and
- One or more suspected data gaps in the higher tier human health or environment endpoints and/or
 - Indication of hazard in the endpoints of concern

Picking the right substances



State of play

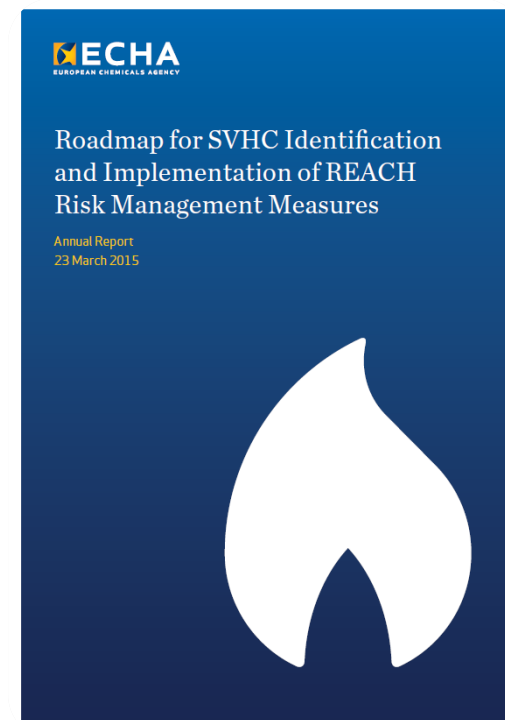
CMRs

- Vast majority of registered and harmonised CMR substances already being dealt with
 - On the Candidate List, under RMOA or no further action needed
 - Some planned for substance evaluation

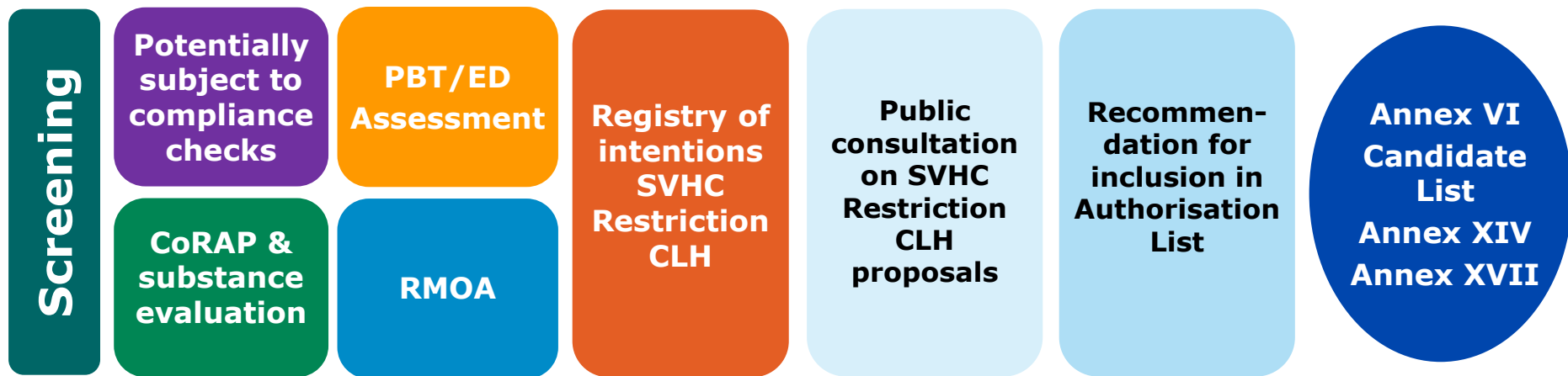
PBTs, endocrine disruptors

- Substances with sufficient hazard information already addressed
- Focus is now on further assessment and data generation

http://echa.europa.eu/documents/10162/19126370/svhc_roadmap_2015_en.pdf



Increasing transparency and predictability



Check PACT at:

<http://echa.europa.eu/addressing-chemicals-of-concern/substances-of-potential-concern/pact>

Get ready for regulatory action

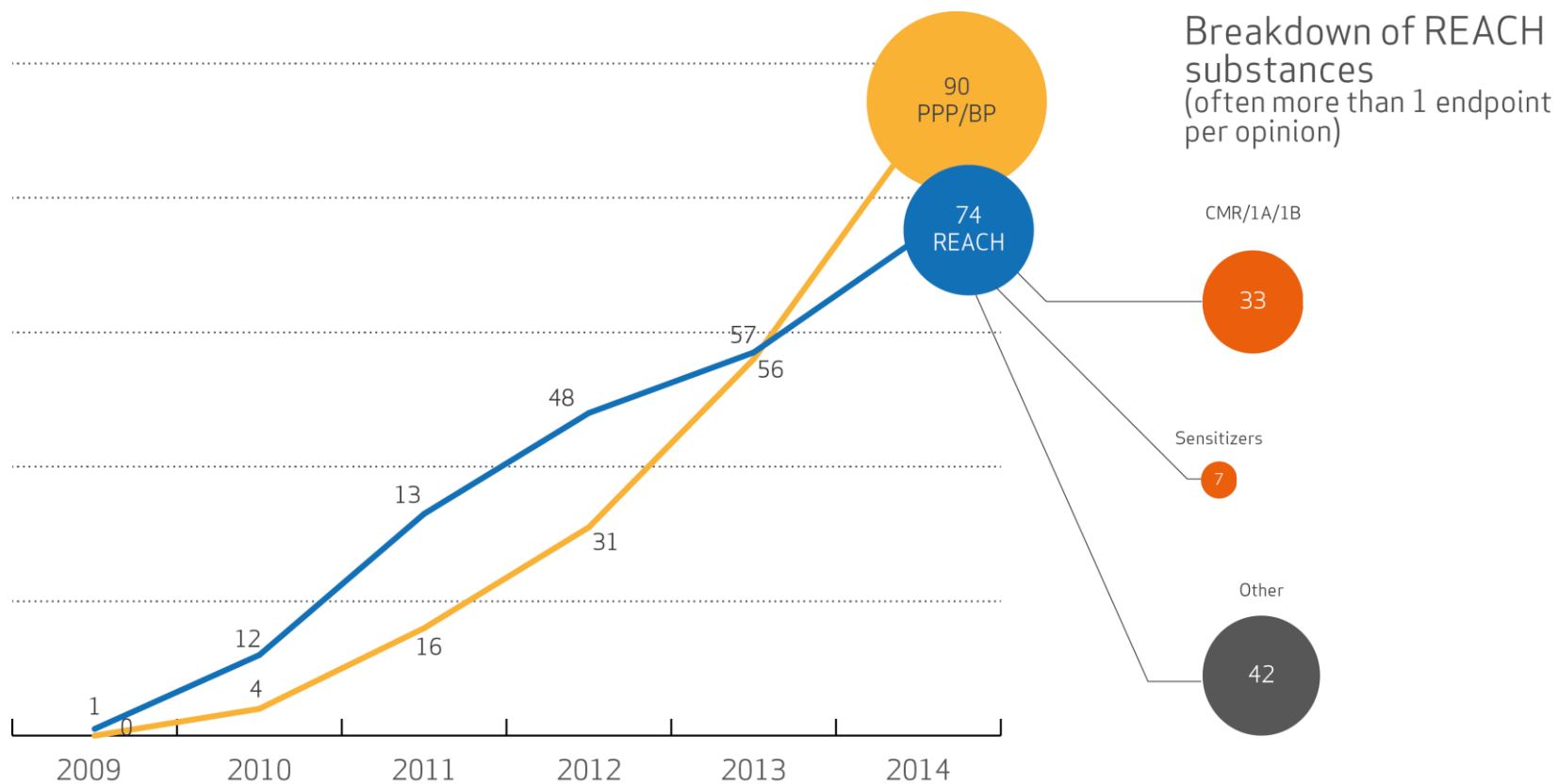
- Keep dossiers up-to-date
 - Volumes, uses and hazard/exposure data
 - Transparent and consistent CSR
 - Communicate use and use conditions upstream and follow risk management advice through the SDS/ESs
-
- ✓ Health and safety concerns can be avoided
 - ✓ Likelihood of regulatory attention reduced
 - ✓ Helps you to be proactive: Consider possible long-term consequences and innovation

State of play

- **CLH**
- **Restrictions**
- **Authorisation**



Harmonised classification and labelling

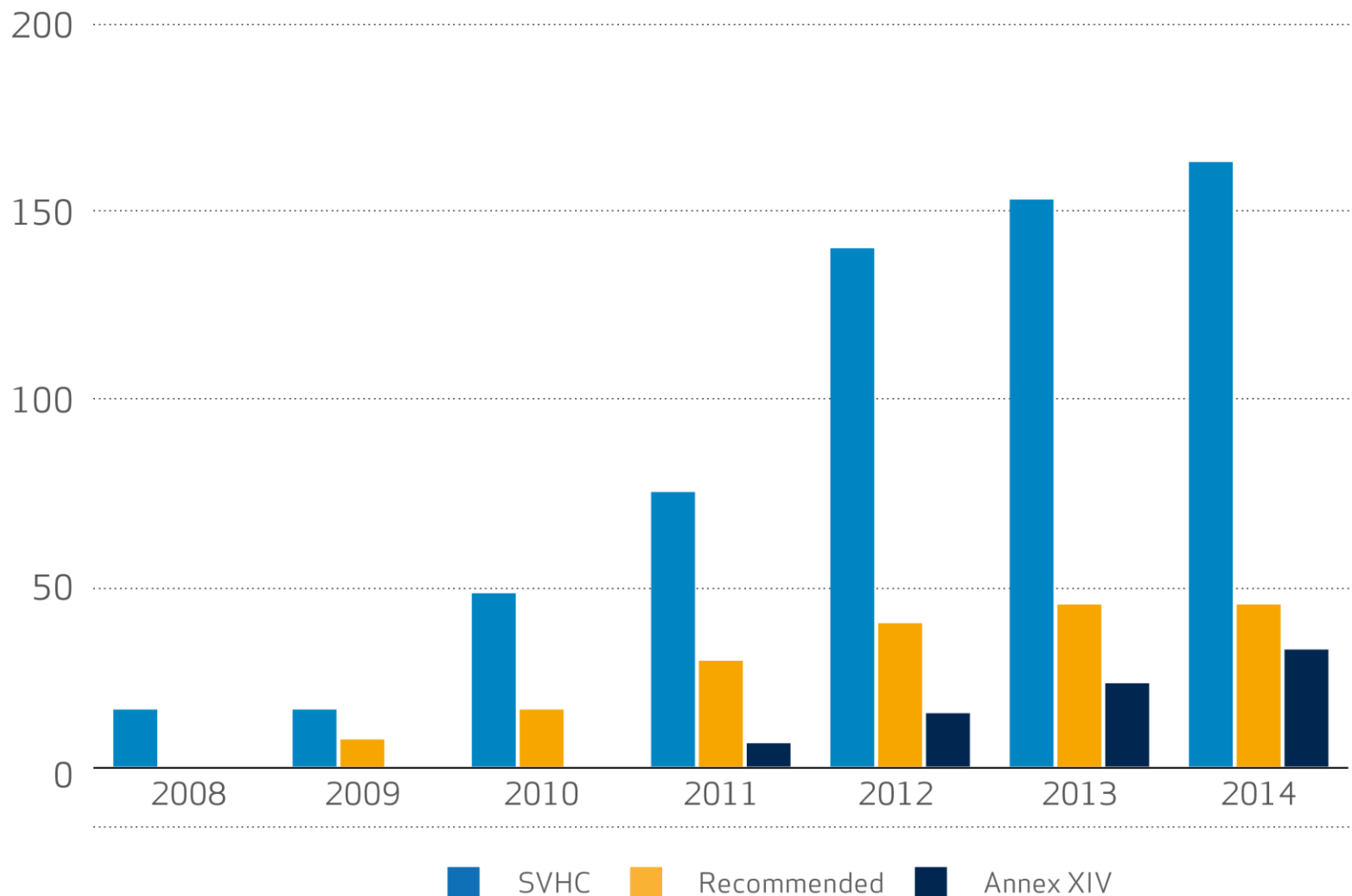




Progress on restrictions

- Process is maturing:
 - Opinions on 13 'substances' sent to Commission; 6 in pipeline
- Efficiency improvements ongoing:
 - Comments received during PC published monthly
 - Working with stakeholders how to better contact downstream users during public consultation
- Work started on restricting the use in articles of substances on the Authorisation List:
 - e.g. Three calls for evidence commenced
 - Phthalates restriction under preparation

Progress on authorisation



Applications for authorisation

- Good progress made with the first applications
- 50 opinions issued supporting the authorisation of justified uses
- Majority of the opinions within seven months, first three decisions taken by COM
- ECHA:
 - Holds pre-submission information sessions and dialogues
 - Improves its tools/formats based on feedback
- Next seminar 29-30 June 2015

Authorisation process

- It is working:
 - Transparent and predictable
 - Public consultations valuable
 - Incentive to substitute
 - Improves risk management measures
 - Well-justified cases will get an authorisation
- Room for improvement:
 - Costs have reduced (by over 30%) but the process can be too burdensome
 - Finding a good balance in “upstream” broad applications

http://echa.europa.eu/view-article/-/journal_content/title/conference-on-lessons-learned-on-applications-for-authorisation



Next steps on authorisation

- Authorisation taskforce recommends in June on simpler applications for low volumes
- Simplified formats
- Commission will implement legally
- We continue to support other cases that may benefit from streamlined applications



Take away

- Good supply chain communication leads to successful risk management – **activate your sectors**
- Help yourself, be proactive and **use the advance notice** that we provide
→ for smart companies a competitive advantage
- Application for authorisation **is working** and is being further streamlined

Get ready

jack.de-bruijn@echa.europa.eu

Subscribe to our news at
echa.europa.eu/subscribe

Follow us on Twitter
[@EU_ECHA](https://twitter.com/EU_ECHA)

Follow us on Facebook
[Facebook.com/EUECHA](https://www.facebook.com/EUECHA)

