

# ECHA Guidance for Downstream users The essentials

Actions on receiving exposure  
scenarios

Chapters 4 and 5

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## Who should read these sections

If you

- use chemicals in your work and/or supply chemicals to your customers
- are a downstream user of chemicals receiving exposure scenarios
- prepare exposure scenario to be attached to the SDS of your products
- prepare a downstream user chemical safety reports

***This part may be relevant for you***



# Chapters 4: DU and the exposure scenario

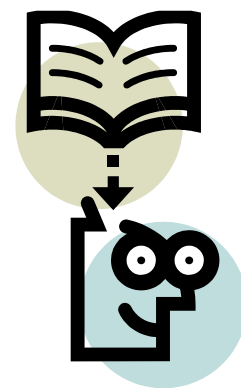


# Dealing with exposure scenarios

## What's in the guidance

### Chapter 4

- Legal requirements for DU receiving ES
- Checking if use and use-conditions are covered
- Uses/use-conditions covered/not covered: what to do



## Legal requirements



- Downstream users' compliance with information received by the supplier
- Practical approach to take to fulfil specific obligations **NEW**
- Where to find information **NEW**



## Checking if uses and conditions of use are covered

- Checking the use
- Checking processes and activities
- Checking the conditions of use
  - Checking Operational Conditions
  - Checking Risk Management Measures
  - Scaling **NEW**
- Handling ESs from different suppliers **NEW**
- Uses advised against

## Scaling (Section 4.2.4 and Appendix 2)

- Definition and applicability **NEW**
  - Relevant for DUs who need to apply scaling
- Boundaries of scaling and options **NEW**
  - Relevant for registrants and DUs who need to provide scaling options to their customers in the SDS



## Check completed: now what?

What to do if

- Use/use-conditions are covered **NEW**
- Use/use-conditions are not covered:
  - options
  - exemptions to prepare a downstream users' Chemical Safety Report

Timescale for fulfilling obligations **NEW**



## → Uses/use-conditions not covered

### Selecting the best option

**Table 10 Options if exposure scenario does not cover the use**

Option	This option could be best if	Advantages	Disadvantages
Exemptions apply (see chapter 4.4.2)	Case-by-case	No changes in process or substances / mixtures needed.	
Make your use known to your	<ul style="list-style-type: none"> <li>- this does not raise confidentiality concerns for you;</li> <li>- you don't understand whether</li> </ul>	- A more specific assessment by your supplier based on	Your supplier may not be able to respond

### Do exemptions apply?

**Table 11 Checking if the exemptions from the duty of Article 37(4) to prepare a downstream user chemical safety report (DU CSR) apply**

Exemption from Article 37(4) of REACH	Explanation - your own use	Explanation - customer's use <sup>52</sup>
37(4)(a) No safety data sheet required for substance or mixture	<p>If your supplier is not obliged to provide you with a safety data sheet for a substance, you do not have the obligation to prepare a DU CSR for your use of that substance.</p> <p>It is possible that you may receive a safety</p>	<p>If you supply your customers with a mixture, but your mixtures do not require a SDS (e.g. substances are used in concentration below threshold limits), information according to Article 32 of REACH needs to be</p>

# Chapter 5 : Preparing a Downstream User Chemical Safety Report (DU CSR)

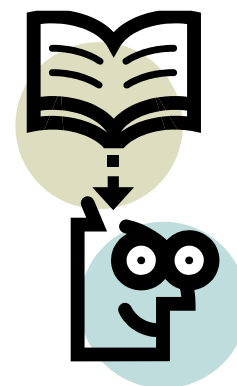


# Preparing a DU CSR

## What's in the guidance

### Chapter 5

- Legal requirements for DU preparing a CSR
- Defining and preparing a DU CSR
- Reporting to ECHA



## Legal requirements



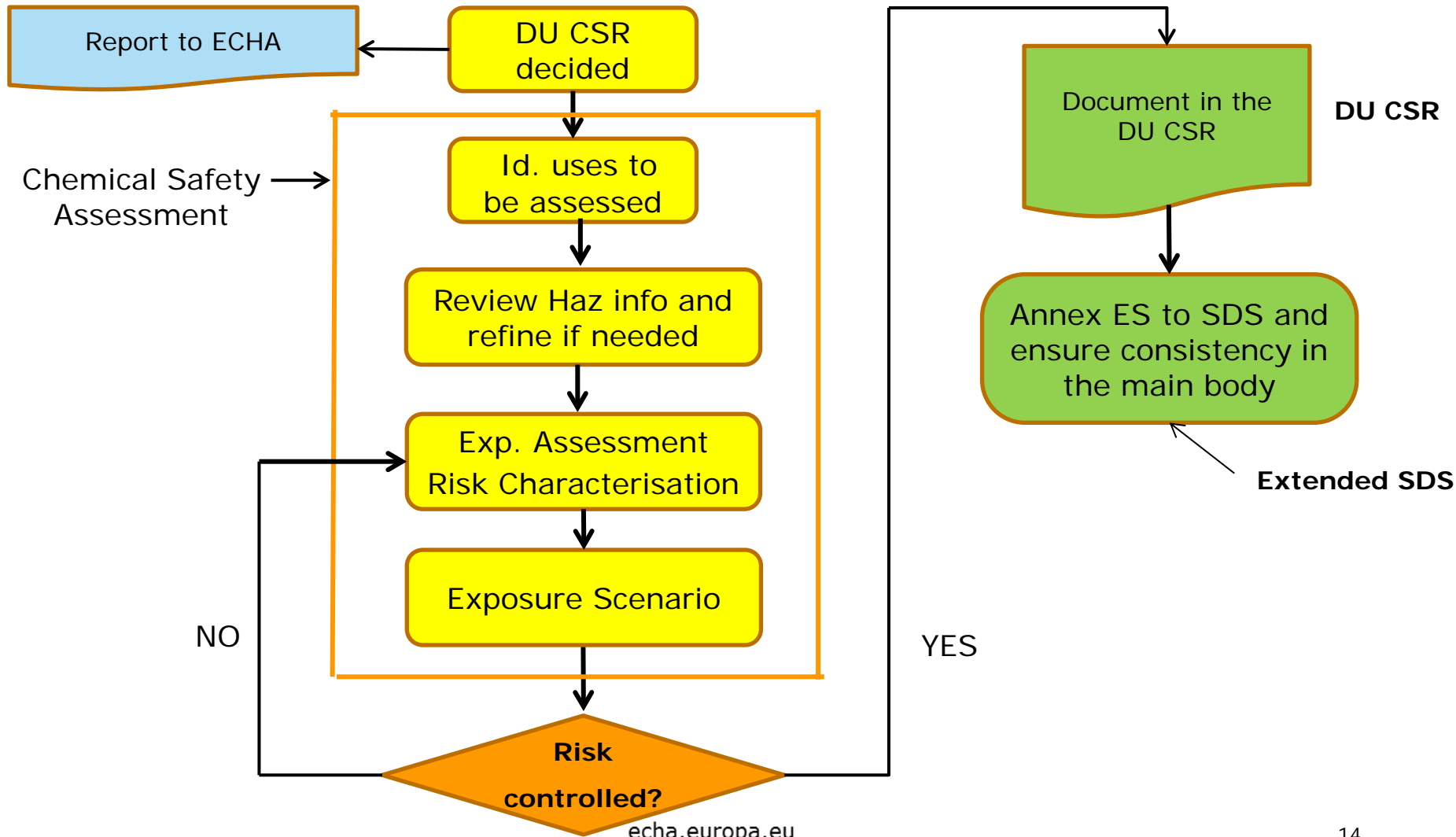
- Legal requirements related to the DU CSR (when it is required and what are the key obligations)
- What should be done in practice to fulfil specific obligations **NEW**



## Preparing the DU CSR

- What is as a chemical safety assessment and report **NEW**
- What is a DU CSR
- Key steps for the DU CSR **NEW**
- Reporting to ECHA **NEW**

## → Step by step approach for DU CSR





## DU CSR : key points

Approach provided to fulfil legal obligation

- Focus on use of existing information
- Implement measures identified in the CSR
- Inform customers

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