

Communication in the supply chain – distributors' challenges

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REACH & CLP affects the entire supply chain
Chemical Distributors play a key role in the use coverage

**MANUFACTURERS /
IMPORTERS**

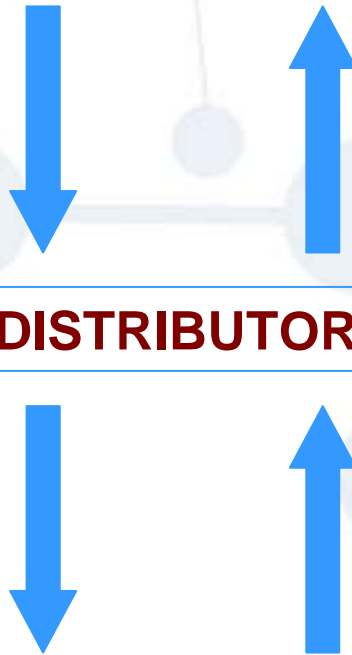
**Properties of
substances and
safe uses**

**Information on uses of
substances**

Top-down preferred

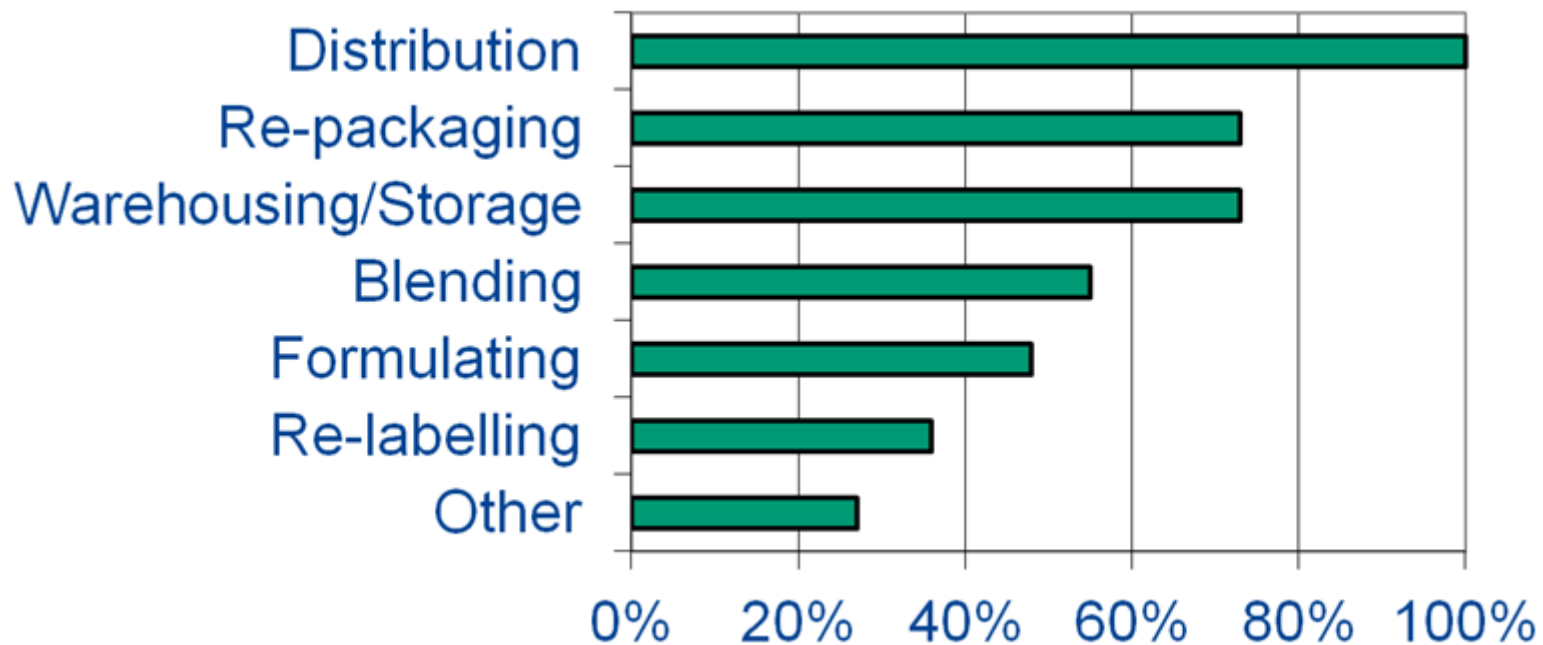
DISTRIBUTORS

DOWNSTREAM USERS



Chemical Distributors may have different roles

- Distribution, import, downstream use or even manufacturing



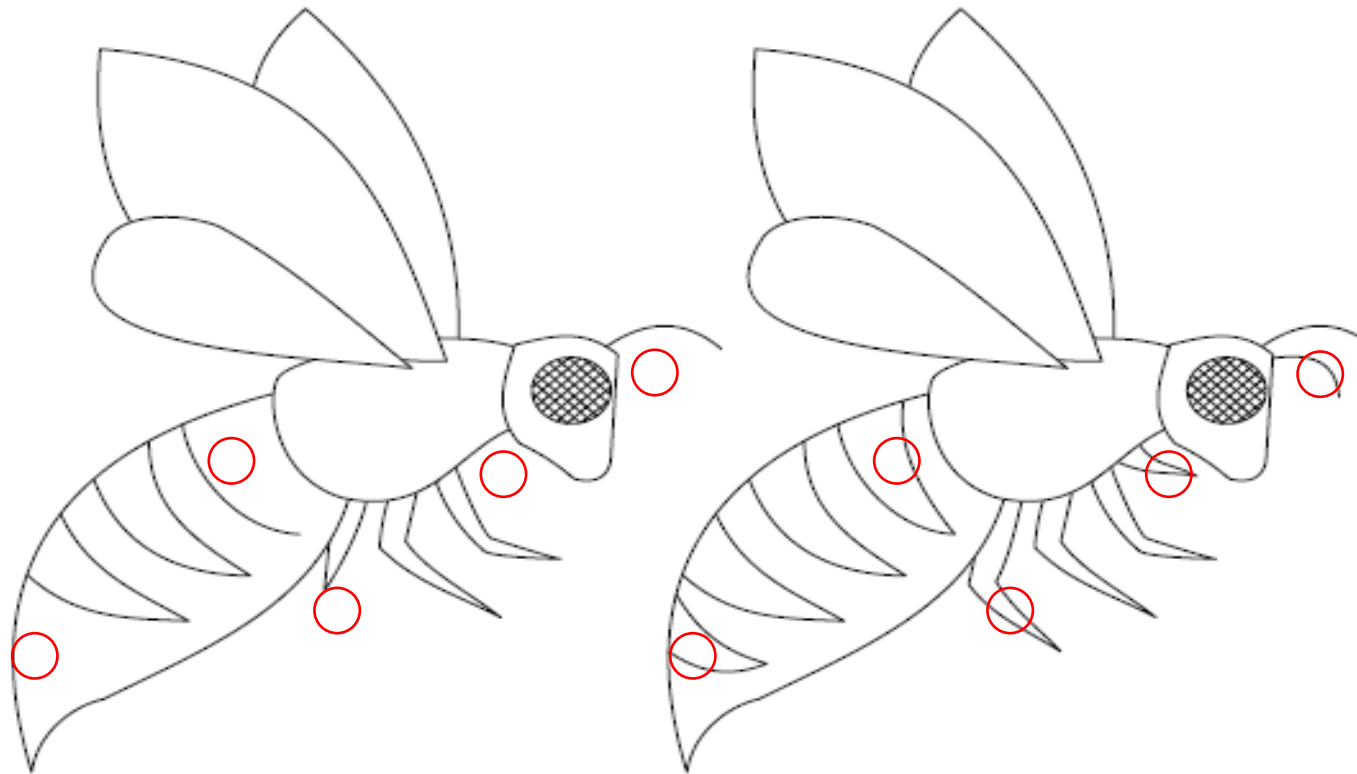
■ Main obligations and challenges:

- Information flow up and down the supply chain
 - receive from manufacturer/importer information about properties of substances & safe uses and inform downwards
 - receive from downstream users (DU) information about the uses and inform up the supply chain, if needed
 - top-down information flow preferred for 2013 registrations
- Check that own uses are covered
- No legal requirement to check that DUs' uses are covered
- Implementation of the measures resulting from ES
- Data management

- **SDS main tool for communication in the supply chain**
 - as such no new requirement
 - New Exposure Scenarios, if required
 - ➔ experience needs to be gained
- **Some figures on SDSs from distributors:**
 - handle up to 60.000 substances or mixtures
 - distribute up to 350.000 SDSs per year, of which
 - up to 250.000 generated in house
 - approximately 100.000 directly forwarded as received from supplier

- **Early figures on ext-SDSs from distributors:**
 - expected ext-SDSs for approx. 1000 to 1500 substances
 - received until now approx. 1000 ext-SDSs for around 170 substances
 - ➔ average six ext-SDSs per substance
- **Main challenge**
 - ➔ to identify the differences between the various suppliers' ESs for the same substance and compare with own operations (own uses, OCs, RMMs)

Any difference?



Source: Brenntag

■ Challenges:

- Different formats
- expert judgment needed, partly lengthy and complex ext-SDSs, not easy to digest!
- different ESs by different suppliers for the same substance, sometimes from the same supplier, but from different legal entities
- missing PROC 8a, 8b and 9 (Transfer)
- conservative/unrealistic safety levels
- missing formulation stage

- **Butyl diglycol (supplier V)**
 - ✓ All relevant SU, PROC, ERC covered
 - ✓ Covers up to 100%, 8 h/day
 - ? Covers only 4200 kg/day per site

- **Formic acid 94% (supplier X)**
 - ✓ All relevant SU, PROC, ERC covered
 - ✓ No limitation of covered quantities
 - ? LEV effectiveness > 90% (PROC 8b: > 97%)

Today's challenges – examples (2)

- **Potassium permanganate (supplier Y)**
 - ? Missing PROC 8a, 8b and 9 (Transfer, Filling)
 - ? Covers only 3 kg/day (!)
 - ? Covers exposure < 1 h/day

- **A solvent (supplier Z)**
 - ? Covers 7800 kg/day, but truck delivers 12000-14000 l

- **Sodium chlorite (Supplier E)**
 - ✓ ES for “Manufacturing stage” and multiple “End uses” covered
 - ? “Formulation stage” missing

- More consistent formats are in use
- Use Descriptor system is widely used
- Use & develop further industry standards e.g. use mapping, ESCOM XML
- Gain expertise, but what about SME's?
- Contact suppliers helped in most cases
- Adapt your OC and RMM measures,
 - PPE ok, to adapt technical installation takes time and needs investments
- Consolidate ES information, scale ES
- Prepare an own DU CSR
- Initiate trainings jointly by authorities & industry

- Do not forget the body text of the SDS (16 sections)
 - ensure consistency between both SDS parts
 - Keep in mind that information about safe use is often easier to digest as describe e.g. in section 8
- Avoid to distribute ext-SDS to final industrial or professional end users, include the information about the safe use into the body text of the SDS
- Clustering of customers into groups

We still have to learn and to gain experience!

Could we think about a simpler system at least for substances with lower hazards?



***Thank you
for your attention!***