

Working session on exemplification of use description during the 9th Meeting of the Exchange Network on Exposure Scenarios (ENES9)

Summary

The objective of the working session was to explore what additional support downstream users and registrants will find beneficial to ensure that the uses are described in an adequate and consistent manner and how this support could be best provided.

A pre-reading document had been sent listing the topics initially identified as needing exemplification.

During the session, the participants were split into different sub-groups to discuss this list of topics in order to confirm that examples where needed, identify any additional topic where illustration would be useful, and prioritise those topics found useful across companies/sectors.

The participants exchanged and each sub-group reported from the discussions. The following points were agreed:

- The main challenge remains the assignment of use descriptors as it is not always clear what is the most suitable descriptor for a specific activity. In this context, the assignment of PROCs was found the most challenging. Additional support on this area was identified as most useful, in particular with regards to the description of transfer activities, activities contained and maintenance.
- The differentiation of Life cycle stages was also an area where further support could be needed. In particular, the difference between the Formulation or the re-packing life cycle stage and the mixing activities taking place upon end-use.
- Also in the area of life cycle stages, the participants mentioned that the distinction between uses at industrial sites and widespread use by professional workers should be exemplified, particularly combined with the extent of HSE management systems so-called 'industrial' or 'professional' conditions. The case of the laboratory uses was also mentioned as needing more guidance in this respect.
- The difference between widespread use by professional workers and consumer uses in the case of DIY or small professional undertakings (e.g. small farms) was also mentioned.
- The assignment of ERCs was found clearer following the new names and flowcharts included in the latest update of the R.12 Guidance document on use description.
- Downstream user sector associations were identified as key organisations able to carry out the 'translation' of specific uses and activities into use descriptors as they are both familiar with the actual uses and the use descriptor system. The development of use maps was noted as the main process where such translation can be done. The

possibilities offered by the new use maps format / IUCLID structure to complement the standard use descriptors by free text (sector specific-) explanation should also support DUs in checking whether they are covered.

- Other topics mentioned were: example of when to split into uses versus contributing activities e.g. how to define the uses where the concentration or the volume at the different steps of a process change, how to report formulation or end-use at manufacturing site.
- The participants welcomed the fact that ECHA offered support to the sectors developing use maps in order to:
 - Identify approaches or lessons to be shared across sectors.
 - Promote consistency among use maps particularly when uses are overlapping or activities are very similarly carried out across sectors.

It was finally concluded that examples will be distilled from the work done by the downstream user sectors when developing use maps. Appropriate formats will be proposed for these examples e.g. Q&As. ECHA will also consider setting up of a network of use maps developers where difficulties and solutions can be exchanged. The use of the ECHA website as a central location to host available information will also be explored.

Annex 1: Working session supporting slides