

Key messages for downstream users

ECHA's seventh Stakeholders' Day
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Why communication in the supply chain is needed

Manufacturer



- Knows the properties of the substance

- Physicochemical
- Toxicological
- Ecotoxicological

Downstream user



- Knows in detail how the substance is used

- Process steps
- Operational conditions
- Risk management measures
- Foreseen products

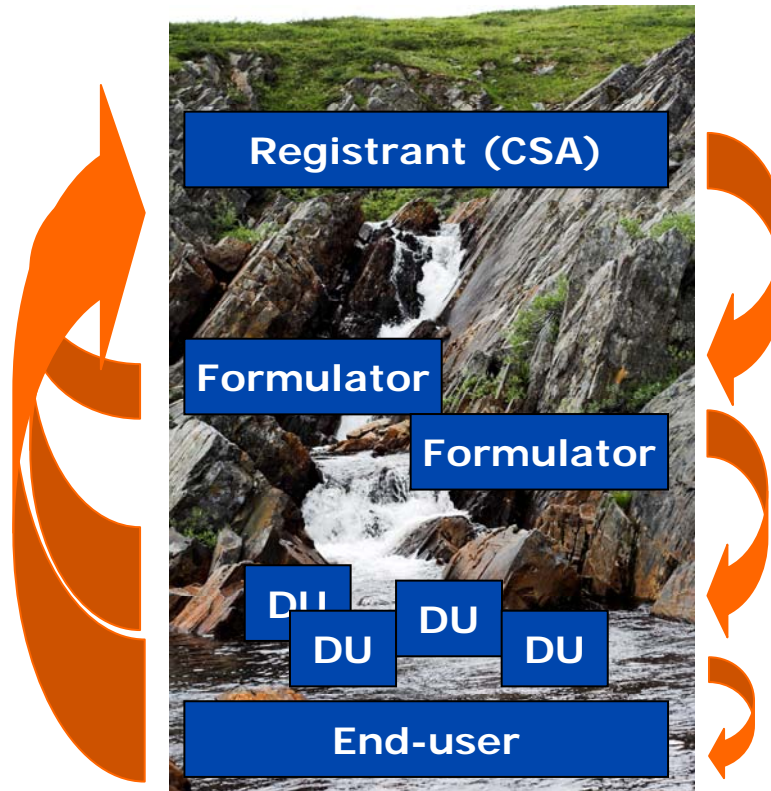


The benefits of good communication

- Clear allocation of responsibilities of different actors
 - Systematic consideration of safe use by consumers
 - Downstream users can benefit from suppliers' assessments
 - Authorities get an overview
 - where communication in the supply chain does not work
 - where there are uses not covered by the registrants' CSA
- More and better information on how chemicals are used in practice

Communication steps in the supply chain

1. Communication of uses to the registrant



2. Communication on safe use to own downstream user

3. Communication on safe use to own downstream user

4. Communication on safe use to own downstream user

Reporting uses for the 2013 deadline



Communicating uses for 2013 registrations

- Lesson learnt from 2010: Top-down approach recommended by industry associations
- Registrants – in cooperation with their customers - to actively communicate which uses they intend to cover
 - Intuitive, concrete description of the use
 - Use descriptors
- Sources for downstream users to check
 - Supplier's website
 - Section 1 of the current SDS
 - Other technical information from the supplier
 - Use mapping by own sector association
- List of substances intended to be registered on the ECHA website

Communicating uses for 2013 registrations

- If use not found, substance-specific communication upstream
 1. Standardised, sector-specific description of relevant uses
 2. Relevant elements of the use descriptor system
 3. Conditions of use
- Standard formats (templates) available



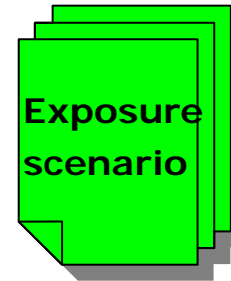
**Exposure scenario: The novel
communication vehicle
under REACH**



The vehicle for communication: Extended safety data sheet



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Main body

- Classification and labelling information
- Registered uses
- Threshold values for exposure (DNEL, PNEC)
- Physicochemical data
- Toxicological and ecotoxicological data

Exposure scenarios

- Use-specific operational conditions
- Use-specific risk management measures

Are own uses and the foreseeable uses further down the supply chain covered in the exposure sc



- Uses identified by title
- Process/tasks covered
- Conditions of safe use described

- Actual conditions of use

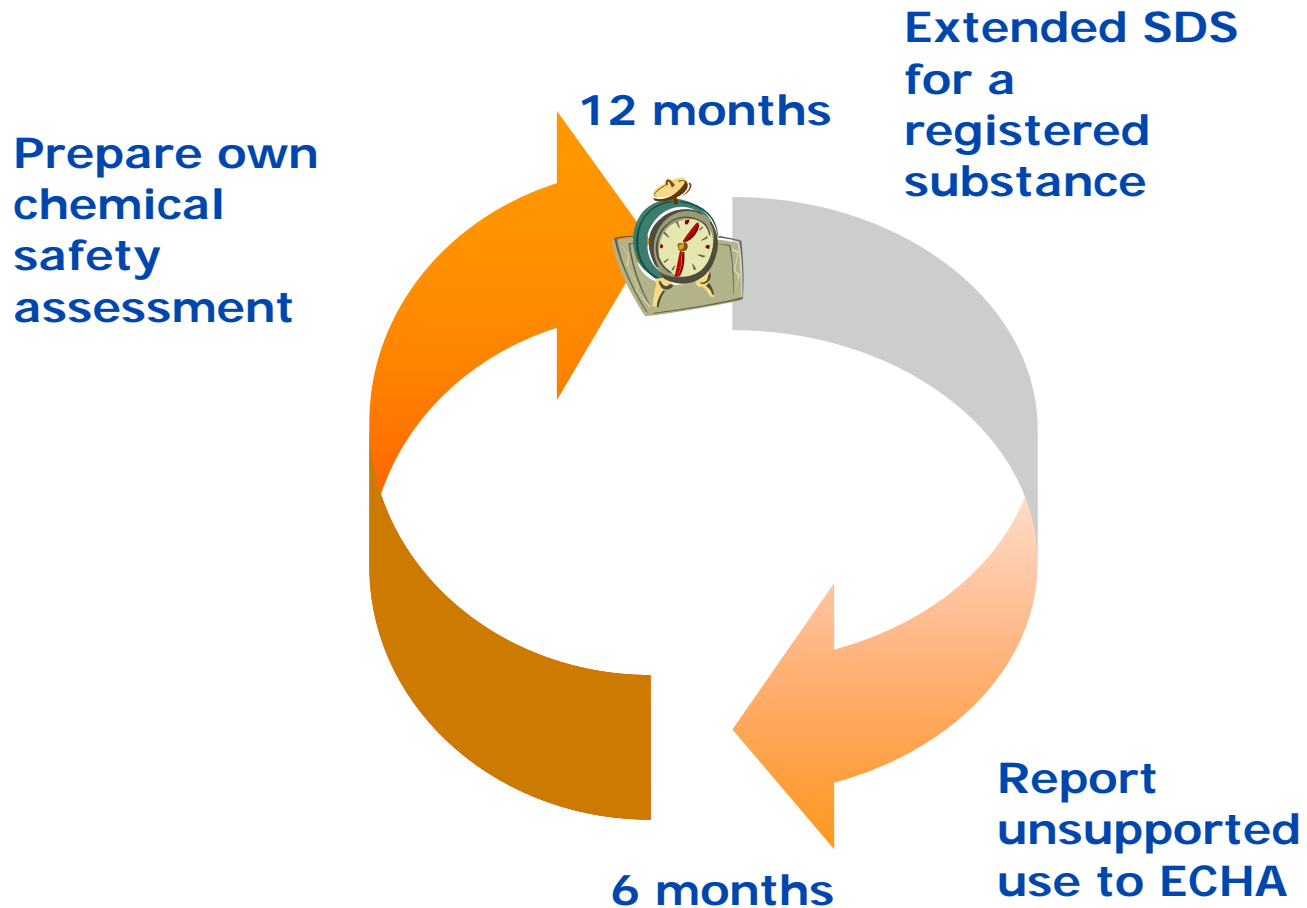
If use/conditions of use are covered in the supplier's exposure scenario

- Document the outcome of your check
- Forward relevant information on uses/conditions of use to your customers (e.g. via extended SDS)
- 12 months to apply the conditions of use as in the exposure scenario

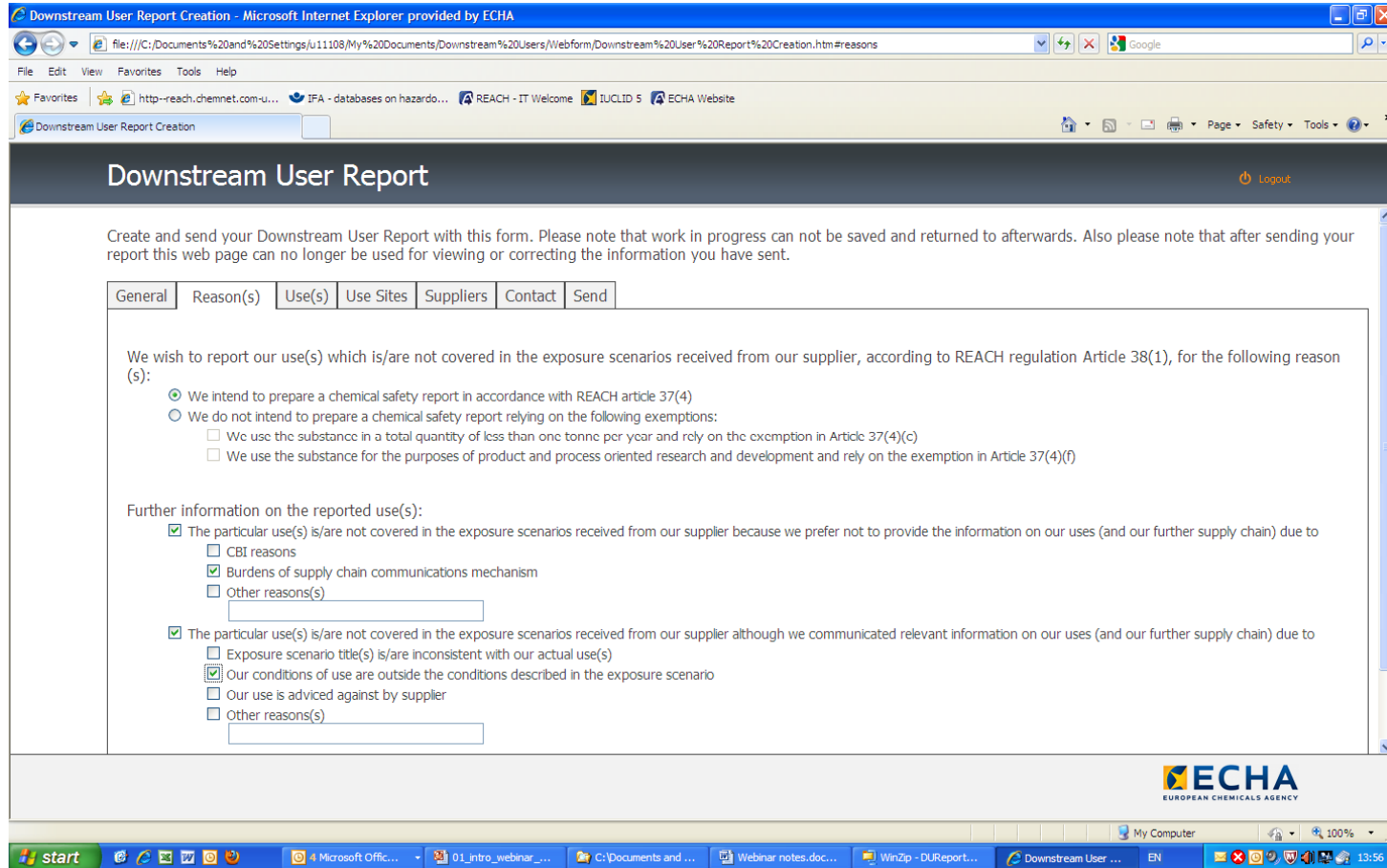
If use/conditions of use are not covered

- Ask your supplier to include non supported uses/conditions of use in their chemical safety report and to make a new exposure scenario available
- Adapt your activity and/or products to the conditions of safe use described in the exposure scenarios
- Look for another supplier whose exposure scenarios cover your uses
- Stop using the substance
- Carry out your own chemical safety assessment for your specific use/conditions of use and report to ECHA

Timelines if use not covered



Reporting to ECHA – web-based format



The screenshot shows a web browser window titled "Downstream User Report Creation - Microsoft Internet Explorer provided by ECHA". The address bar shows a file path. The browser's address bar contains the URL: file:///C:/Documents%20and%20Settings/ju11108/My%20Documents/Downstream%20Users/Webform/Downstream%20User%20Report%20Creation.htm#reasons. The browser's address bar also shows a search engine icon for Google. The browser's menu bar includes File, Edit, View, Favorites, Tools, and Help. The browser's toolbar includes a home button, a search button, a print button, a page button, a safety button, and a tools button. The browser's status bar shows the current page is "Downstream User Report Creation".

Downstream User Report Logout

Create and send your Downstream User Report with this form. Please note that work in progress can not be saved and returned to afterwards. Also please note that after sending your report this web page can no longer be used for viewing or correcting the information you have sent.


General Reason(s) **Use(s)** Use Sites Suppliers Contact Send

We wish to report our use(s) which is/are not covered in the exposure scenarios received from our supplier, according to REACH regulation Article 38(1), for the following reason(s):

- We intend to prepare a chemical safety report in accordance with REACH article 37(4)
- We do not intend to prepare a chemical safety report relying on the following exemptions:
 - We use the substance in a total quantity of less than one tonne per year and rely on the exemption in Article 37(4)(c)
 - We use the substance for the purposes of product and process oriented research and development and rely on the exemption in Article 37(4)(f)

Further information on the reported use(s):

- The particular use(s) is/are not covered in the exposure scenarios received from our supplier because we prefer not to provide the information on our uses (and our further supply chain) due to
 - CBI reasons
 - Burdens of supply chain communications mechanism
 - Other reasons(s)
- The particular use(s) is/are not covered in the exposure scenarios received from our supplier although we communicated relevant information on our uses (and our further supply chain) due to
 - Exposure scenario title(s) is/are inconsistent with our actual use(s)
 - Our conditions of use are outside the conditions described in the exposure scenario
 - Our use is advised against by supplier
 - Other reasons(s)


EUROPEAN CHEMICALS AGENCY

My Computer 100% 13:56

To be available on the downstream user pages of ECHA's website from mid 2012

Current issues





Known issues under discussion

- Length and complexity of extended SDS
- Scaling
- Exposure scenarios for mixtures
- Links with other environment, health and safety legislation

ECHA support

- ENES
 - ECHA Stakeholder Exchange Network on Exposure Scenarios
 - Brings together manufacturers/importers, downstream users and authorities
 - A platform for sharing best practise and practical solutions for making most out of the exposure scenarios
- Initiation and facilitation “Roadmap towards good quality CSR information” discussions
- www.echa.europa.eu/downstream



Thank you.

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