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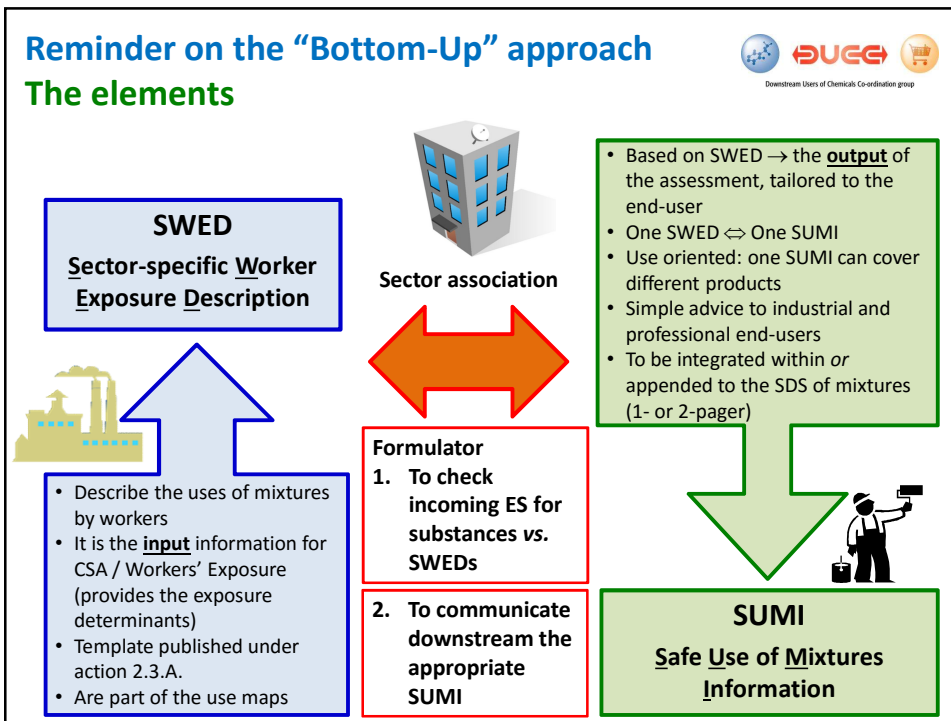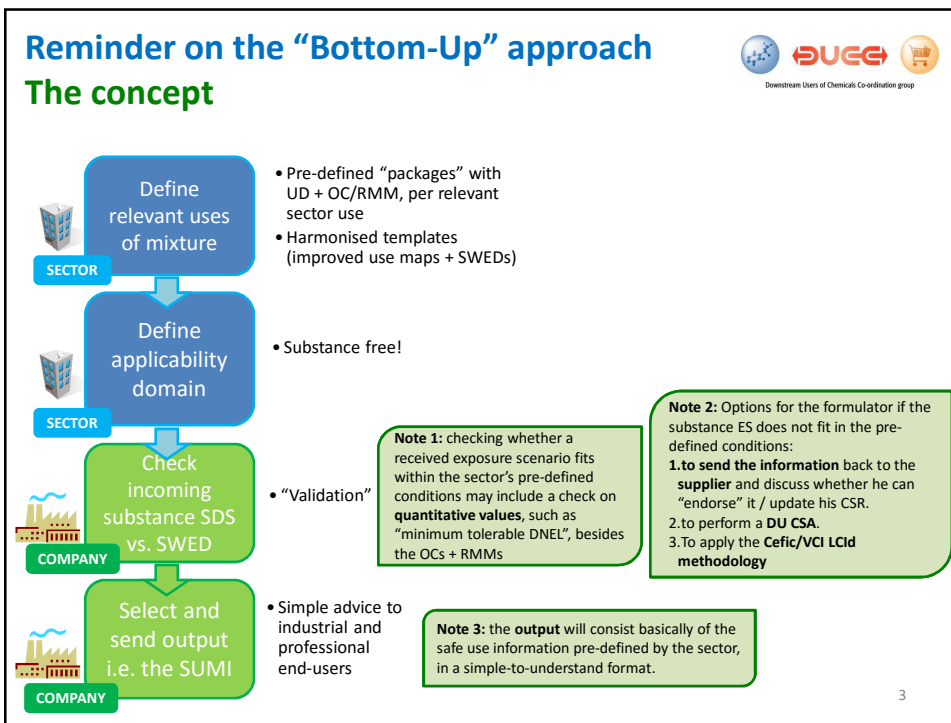# SUMIs –
Safe Use of Mixtures Information for end-users

CSR/ES Roadmap

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Workshop on Use Maps package
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Content

- Reminder on the "bottom-up" approach
- Additional considerations on the SUMIs
- SUMI: agreed format
- SUMI adaptation by sector associations
- Implementation at company level

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Reminder on the "Bottom-Up" approach
The concept

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SECTOR — Define relevant uses of mixture

- Pre-defined "packages" with UD + OC/RMM, per relevant sector use
- Harmonised templates (improved use maps + SWEDs)

SECTOR — Define applicability domain

- Substance free!

COMPANY — Check incoming substance SDS vs. SWED

- "Validation"

Note 1: checking whether a received exposure scenario fits within the sector's pre-defined conditions may include a check on **quantitative values**, such as "minimum tolerable DNEL", besides the OCs + RMMs

Note 2: Options for the formulator if the substance ES does not fit in the pre-defined conditions:
1. **to send the information** back to the **supplier** and discuss whether he can "endorse" it / update his CSR.
2. to perform a **DU CSA**.
3. To apply the **Cefic/VCI LCId methodology**

COMPANY — Select and send output i.e. the SUMI

- Simple advice to industrial and professional end-users

Note 3: the **output** will consist basically of the safe use information pre-defined by the sector, in a simple-to-understand format.

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Reminder on the "Bottom-Up" approach
The elements

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SWED
Sector-specific Worker Exposure Description

Sector association

- Describe the uses of mixtures by workers
- It is the **input** information for CSA / Workers' Exposure (provides the exposure determinants)
- Template published under action 2.3.A.
- Are part of the use maps

Formulator
1. **To check incoming ES for substances *vs.* SWEDs**
2. **To communicate downstream the appropriate SUMI**

- Based on SWED → the **output** of the assessment, tailored to the end-user
- One SWED ⇔ One SUMI
- Use oriented: one SUMI can cover different products
- Simple advice to industrial and professional end-users
- To be integrated within *or* appended to the SDS of mixtures (1- or 2-pager)

SUMI
Safe Use of Mixtures Information

Additional considerations on the SUMIs

- Sending information on safe use of mixtures is mandatory for classified products (REACH Art. 31(7))
  - Therefore SUMI, although 'voluntary', can be considered 'mandatory' only for classified products

- Do <u>not</u> replace **SDS**!
  - SDS includes **product-specific** information (classification, specifications of Personal Protective Equipment, …) and SUMI is for the *use*

- Sometimes more than one SUMI can be integrated within *or* appended to the SDS
  - this is due to different approaches for creation of SWEDs by the different sectors: either at <u>use</u> or <u>contributing activity</u> level

- **Template** is published (Dec. 2015)

- Will ideally be **translated**

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SUMI: agreed format

Mandatory SUMI content	Optional SUMI content

SUMI: Safe Use of Mixtures Information for end-users	**Sector / Company logo**
Sector_SUMI_code: Title of SUMI	
General description of process covered *May include use descriptor codes or reference to SWED*	
Operational Conditions	
Maximum duration:	*xx min.*
Other:	*xxx*
Risk Management Measures	
Required RMMs, use of pictograms	
Reference to Section 8 of SDS for RMM specifications	
If applicable: any environmental measures	
Disclaimer	
Disclaimer on boundaries of SUMI use	
Sector_SUMI_code / version number	

Good practice advice
If relevant, applicable (sector-specific) good practice advice
Use of pictograms when available
Additional information on product composition
To include references to other relevant sections of SDS or product label
Sector_SUMI_code / version number

NOTE: This format is still subject to (minor) editorial changes.

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SUMI Adaptation by Sector Associations

	One SUMI per actitivity	One SUMI per use
OCs and RMMs	PROC specific	Worst case PROC
Display of OCs / RMMs	Individual	Tabulated
Risk management	Focus on PPE	Focus on technical controls
Information on ventilation	LEV occasionally	Air changes per hour
Relation to substance hazard	Different RMM levels for different hazards	Minimum tolerable DNELs
Assessment tool	TRA v.3 and higher tier tools (e.g. ART, Stoffenm.)	Relies mainly on TRA v.3
Industry reference	Similar to GISBAU and existing company tools	Comparable with German VSK logic

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Implementation at Company Level

- SUMIs are designed as **80 / 20 solution**
- Companies need to care for remaining 20 % special cases with deviating OCs and RMMs
- Companies may need to design SUMIs for **special uses** and **life cycle stages**
- Companies need to consider **exposure expectations** which are not (well) reflected in standard tools like ECETOC TRA
- Companies may need to pass on information about mixtures containing substances which have undergone a **DU chemical safety assessment**
- **Environmental SUMIs** to be developed (e.g. based on a concept of minimum tolerable PNECs); alignment by business association appreciated
- Companies need to **assign** all **hazardous products** to one or more SUMIs
- Companies need to enable **IT systems** to ensure that SUMIs are justified

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Thank you for your attention!

Questions?

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