

Communicating safe use information on mixtures

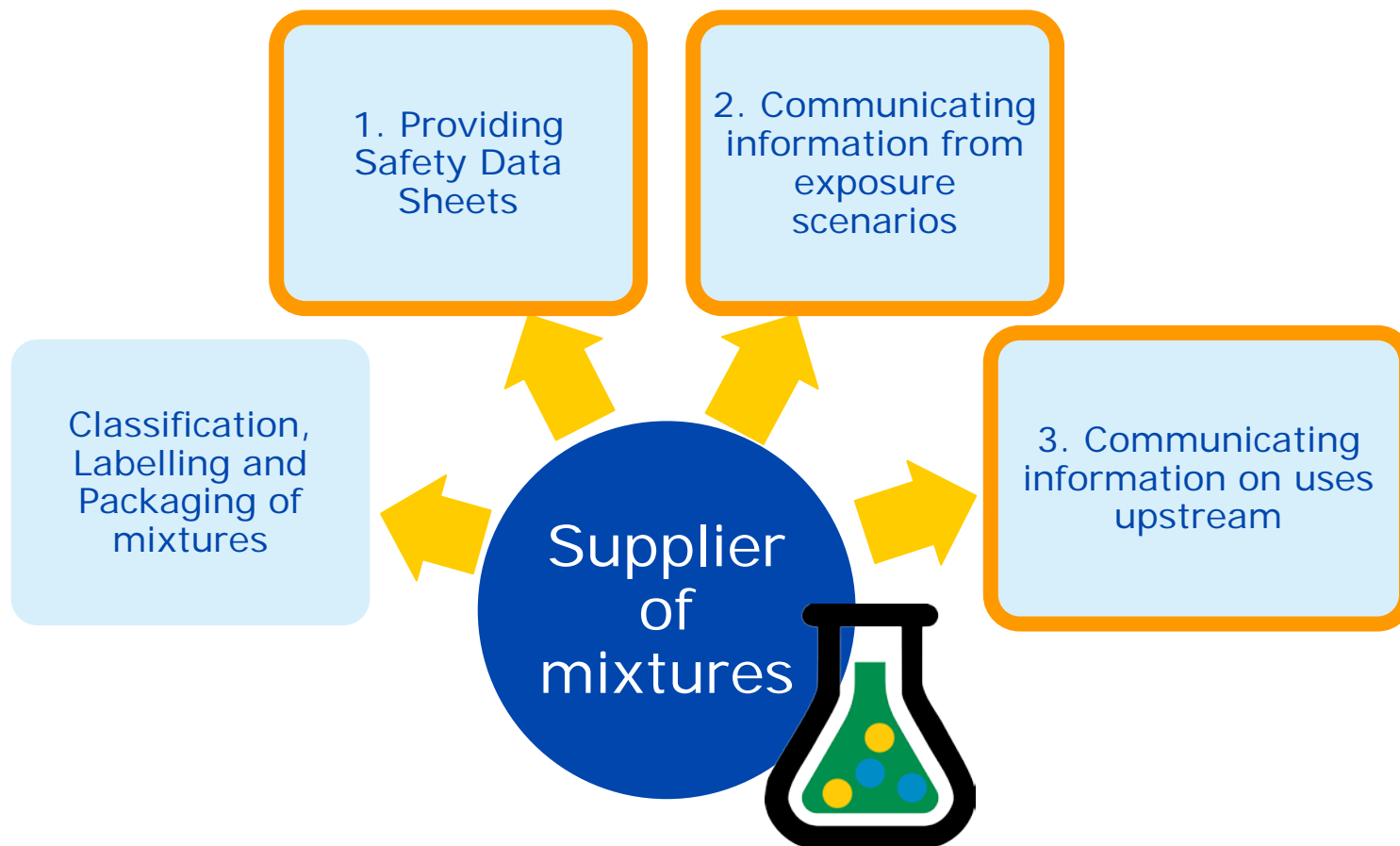
Mixture classification and communicating safe use of mixtures. Advice for formulators and importers

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Outline



Communicate on mixtures

- Suppliers of mixtures have a key role to play in enhancing the safe use of chemicals.
- This presentation aims to clarify how to communicate relevant information both to your suppliers and to your customers.

Communication in the Supply Chain

Registrants



Registration dossier

Chemical Safety Report
Exposure Scenarios

Safety Data Sheet Exposure Scenarios



Information on uses



Safety advice

Customers (Downstream users)

Communicate on mixtures

- Cycle of information: to receive relevant safe use information from the registrants of your substances, you should provide them with a clear descriptions of your uses.
- Good communication between suppliers, formulators and users results in an improved business environment.

1. Communicating information for safe use of mixtures downstream



When a safety data sheet (SDS) should be provided for mixtures?

- Classified mixtures when supplied to downstream users or distributors
 - Exemption: if sold to the general public with sufficient information for safe use, SDSs only upon request by downstream user or distributor
- On request for non-classified mixtures that contain substance(s) that:
 - pose human health or environmental hazard (concentration limit)
 - persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB) (concentration limit)
 - are included in the Candidate List of substances of very high concern for authorisation
 - assigned for Community workplace exposure levels

2. Exposure scenarios and how to communicate information further downstream



Exposure scenarios (ES)

- provide information on how the exposure of workers, consumers and the environment to substances can be controlled to ensure safe use.
- are included as an annex to extended SDS of a substance when a chemical safety assessment has been carried out.

Downstream user obligations related to exposure scenarios (ES)

1. To check and implement ES and take necessary action to ensure safe use.
 2. To convey relevant safe use information down the supply chain to customers.
- Note that you may receive exposure scenarios for a given use from different suppliers, and find that they are not directly comparable.

When to expect exposure scenarios?

Chemical safety assessment with exposure assessment is required:

When it is a substance



And registered > 10 tonnes / year



And it is hazardous

What to do when you receive an ES

Check that
your use and
customer use
is covered



Check that the
conditions
match your
actual
conditions



Take
necessary
actions

If you have data indicating that applying exposure scenario leads to unsafe use, inform your supplier and take actions to better control the risks

Conditions differ slightly from ES

- You may be able to demonstrate that under your conditions of use exposure is equal or lower than under those described in the exposure scenario
- **Scaling** = mathematical approach where modification of one factor can be compensated by another
- Can only be applied if the registrant has used an exposure estimation tool in the chemical safety report
- The supplier must provide information:
 - The mathematical method to be applied.
 - Parameters which can be scaled.
 - Boundaries of scaling.

Uses and conditions of use covered

- No further action under REACH.
- Document your inspection and actions you may have taken.

Conditions not covered

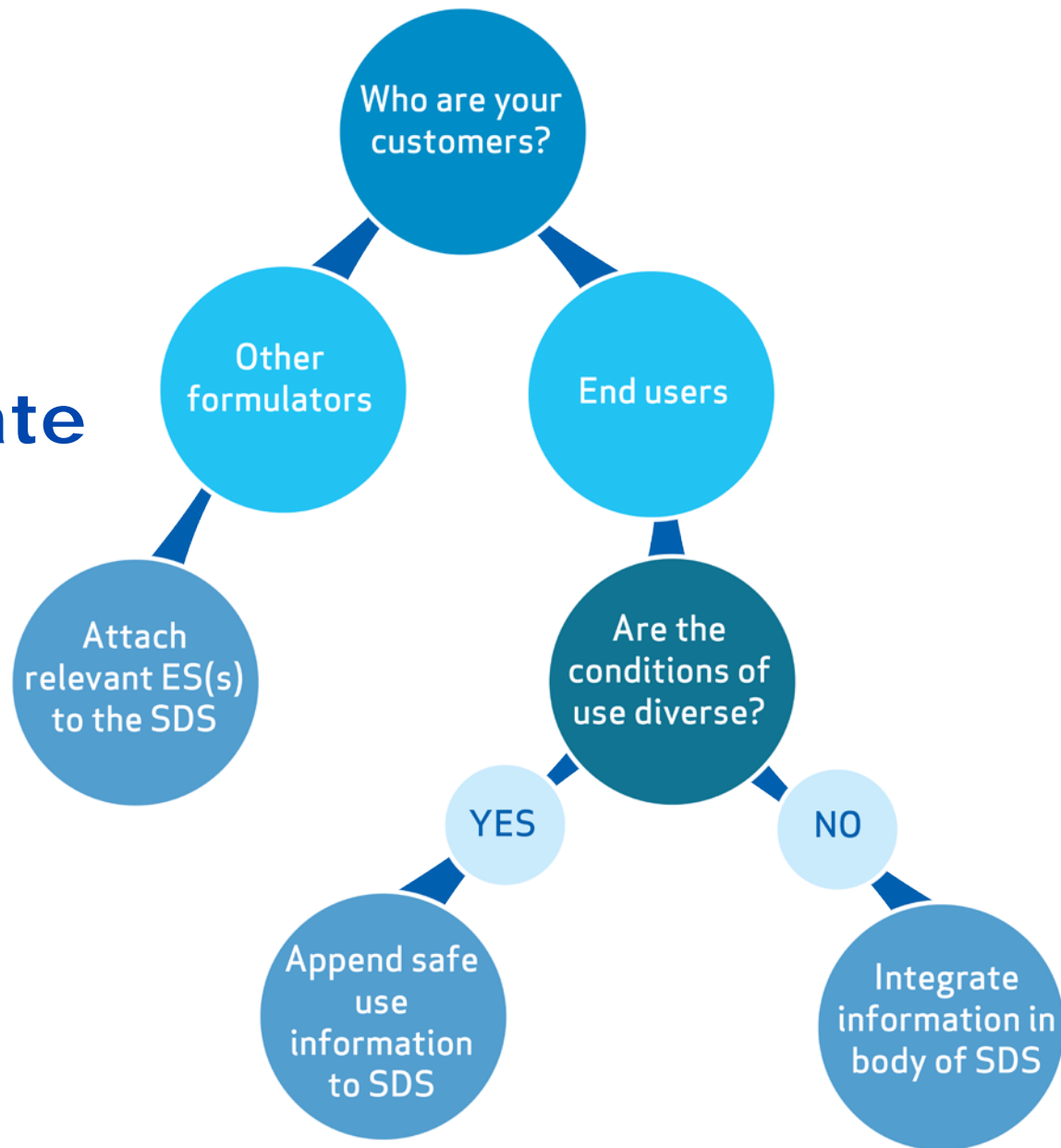
Five options:

1. Contact your supplier to have the ES updated with your use covered.
2. Change your process to implement the ES.
3. Substitute with another substance or process.
4. Find a supplier providing ES that covers your conditions.
5. Prepare a downstream user chemical safety report (DU CSR) to establish safe conditions for the use not covered in ES.

Exposure scenarios – possible issues

1. You may receive different information from different suppliers for the same substance. If so:
 1. Verify substance ID, properties, uses.
 2. Inform your suppliers.
2. If the discrepancy is not resolved by your suppliers:
 1. Use the most stringent ES, or
 2. Use a less stringent ES, ensure safe use and document justification for this choice.

Suggested ways to communicate to your customers



Inform your customers without delay when new information becomes available

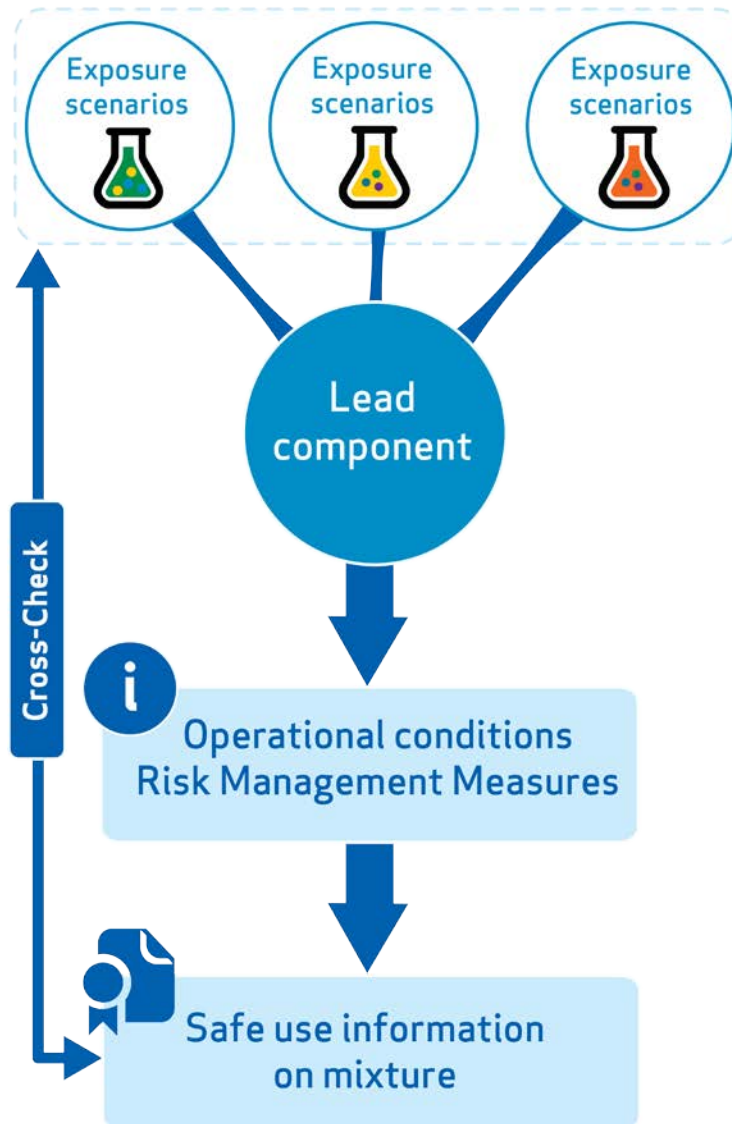
Generating safe use information for mixtures

- Unless you forward the relevant exposure scenarios directly, you need to identify the appropriate information to communicate downstream.
- Industry and authorities are developing and testing approaches to generate aligned safe use information for mixtures.

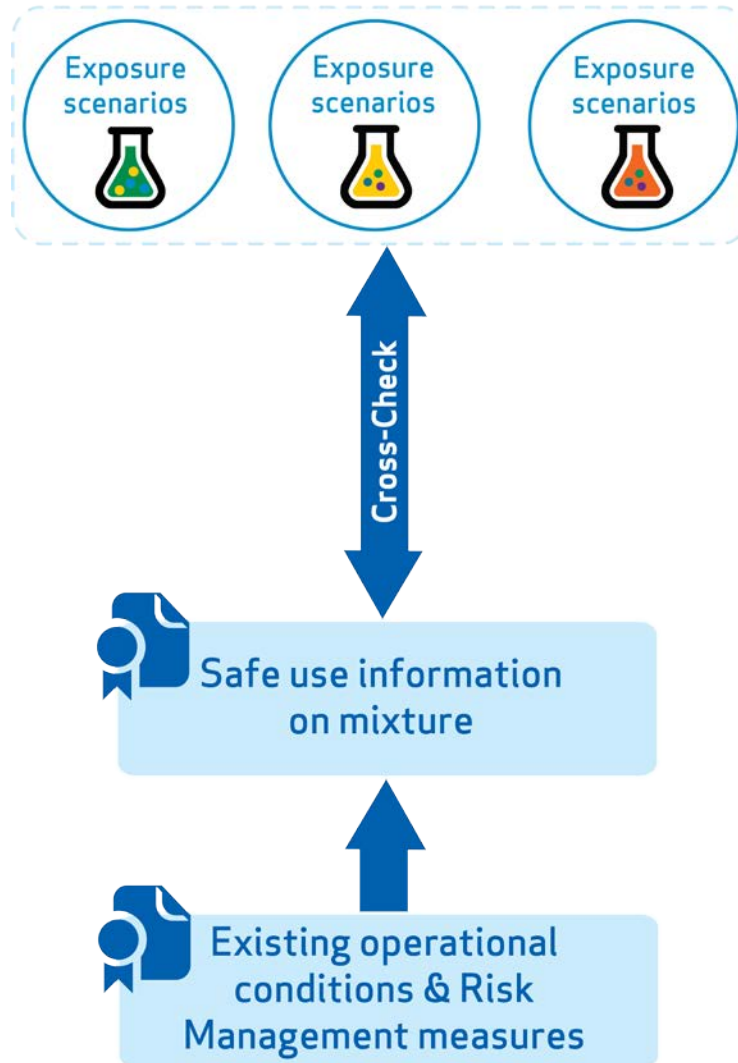
Two general approaches:

1. Exposure scenario approach, “top-down”.
2. Existing controls approach, “bottom-up”.

'Top-down'



'Bottom-up'











“Top-down” method

- Generic methodology is being developed by The European Chemical Industry Council (Cefic) and German Chemical Industry Association (VCI).
- The approach will be presented at Exchange Network on Exposure Scenarios meeting (ENES 7, Nov '14) followed by stakeholder consultation.
- Practical guide to be launched in 2015.

“Bottom-up” methods

- Several sector-specific approaches exist, including:
 - A.I.S.E. (International Association for Soaps, Detergents and Maintenance Products),
 - ATIEL (The Technical Association of European Lubricants Industry),
 - ESIG (European Solvents Industry).
- Typically based on generic ES characteristics for that sector, built from mapping of uses in the sector.

Brushing a concentrated professional product

Operational conditions	
Maximum duration	220 minutes per day.
Process conditions	Process is carried out at room temperature.
	In case of dilution, tap water at a maximum temperature of 45 degrees Celcius is used.
	No LEV needed; good general ventilation at workplace is sufficient.
Risk management measures	
Conditions and measures related to personal protection equipment (PPE), hygiene and health evaluation	Use gloves and safety goggles. See Section 8 of the SDS of this product for specifications.  
	Training of the worker in relation to proper use and maintenance of the PPE must be ensured.
Good practise advice	
Don't eat or drink, don't smoke, no open flame	  
Wash hands after use Avoid contact with damaged skin Do not mix with other products	  
Spillage instructions	Dilute with water and mop up.
Additional good practice advice	Follow the product instructions as specified on the label or in the product information sheet and use good occupational hygiene practices as specified in Section 7 of the SDS of the used product.
Environmental measures	
Prevent that the undiluted product reaches surface waters.	

Properties of product composition	
In Section 2 of the SDS of products and on the label the classification of the undiluted product is provided.	
The classification of a product is based on the classified ingredients in the products. All ingredients contributing to the classification of the mixture are mentioned in Section 3 of the SDS.	
Relevant limit values of the ingredients on which the exposure assessment is based, are stated in Section 8 of the SDS.	
This product may contain sensitizing ingredients, that may cause an allergic reaction in certain people. Section 15 of the SDS states these ingredients, when applicable to the product.	

Use descriptors	
SU 22	Professional use
PC 35	Washing and cleaning product
PROC 10	Roller application or brushing
ERC 8a	Wide dispersive indoor use of processing aids in open systems
	If appropriate AISE SpERC 8a.1.a.v2 may apply: Wide dispersive use in "Down the drain" cleaning and maintenance products that are treated by a municipal STP.

3. Communicating information upstream



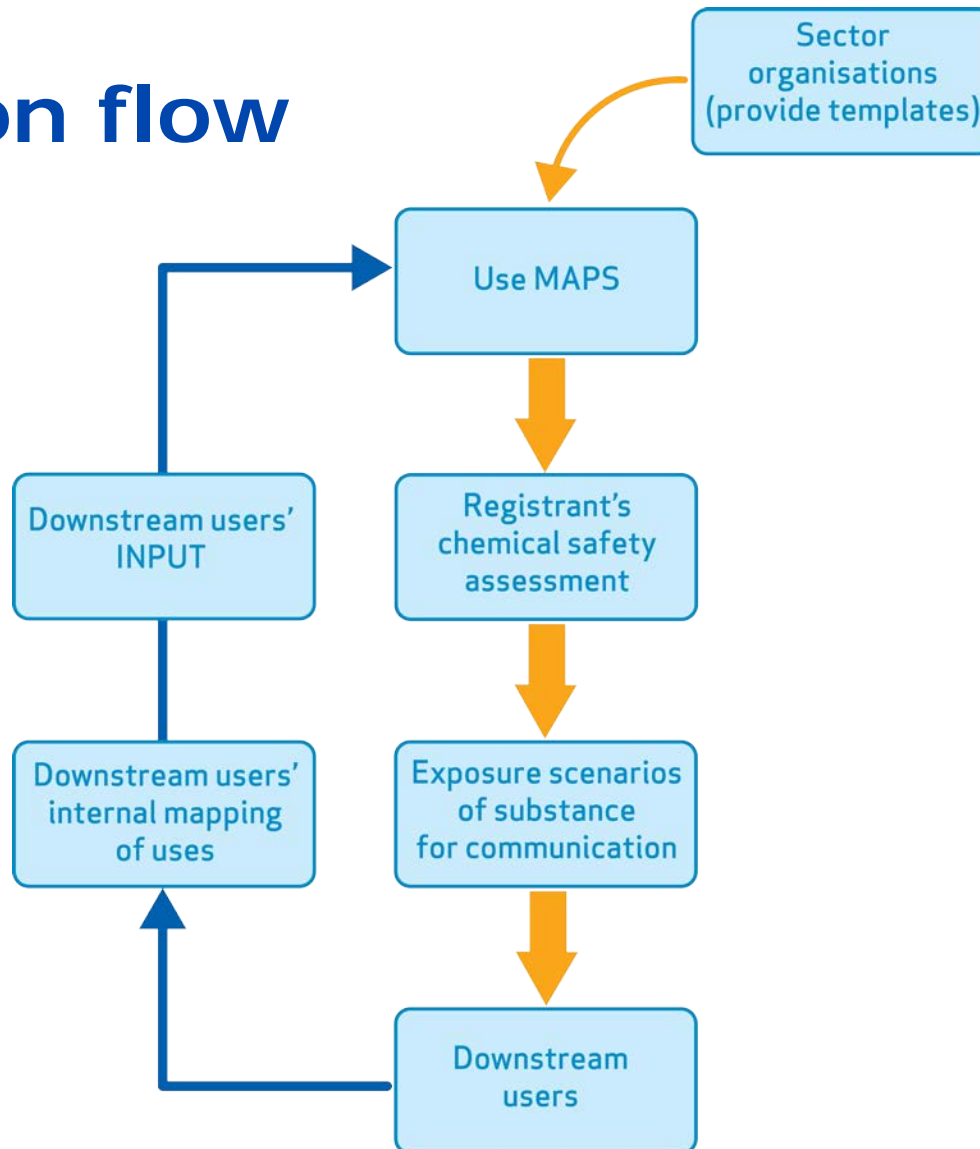
Downstream users' obligations under REACH

- To inform their suppliers:
 - recommended risk management measures are inappropriate.
 - aware of new hazard information.
- Downstream users may also communicate their uses upstream.

Communicating about uses

- **Why?** Reliable data on uses → realistic safety assessment
→ adequate risk management measures.
- **How?** Use maps.
- **Where do I find use maps?** Industry sectors continue to develop sector-specific use maps.

Information flow



Thank you

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