



International Association for Soaps,
Detergents and Maintenance Products

10th Meeting of the Exchange Network on Exposure Scenarios (ENES10)

*A.I.S.E. experience – working with the
improved template*

*15 November 2016
Francesca Angiulli, A.I.S.E.*



Agenda

- **Why** is A.I.S.E. doing this? → Introduction
- **What** has been done? → Overview of A.I.S.E. plan on use description
- **How** did we get there? → Organisation of the work at association level
- **Results** → the practical use of the template

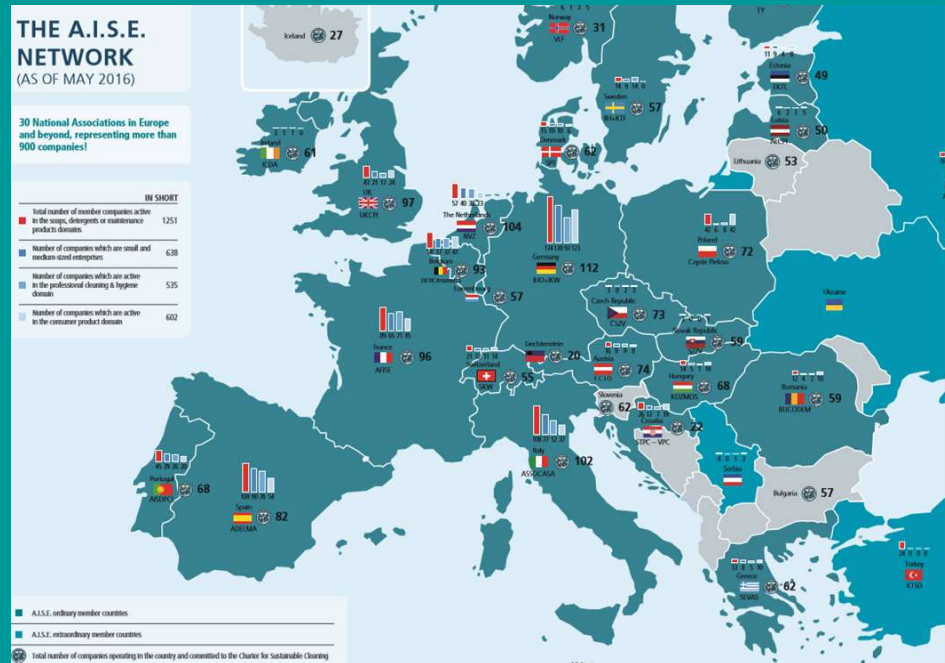


Who are A.I.S.E. members?

ABOUT A.I.S.E.

Based in Brussels, the International Associations for Soaps, Detergents and Maintenance Products has been the voice of the industry to EU Regulators for over 60 years. Membership consists of 30 national associations across Europe and nine European market-leading companies. Through this extensive network, A.I.S.E. represents over 900 companies supplying household and professional cleaning products and services across Europe.

A.I.S.E. has a long history in leading voluntary industry initiatives that focus on sustainable design, manufacturing and consumption, products safety and safe use of products by consumers and professional customers.



Introduction - Why is A.I.S.E. doing this?



Challenges for detergent products' downstream users:

- Not all eSDS available and sometimes poor quality
- (End) uses not always covered in SDS
- Unrealistic RMM/OC
- > 60% SMEs → difficult to establish 1:1 communication with suppliers



Since options are limited, our best choice is to receive **realistic, harmonised** ES from registrants ⇒ use covered



Overview of A.I.S.E. plan - **What** has been done?

- First **table of uses** made available to members in 2009, followed by updates in 2011 and 2014 of different parts
- Changes made because of new information available, feedback by members on more representative conditions of use, alignment with new guidance material, ...
- **SPERCs** (Specific Environmental Release Categories) published in October 2012
- **SCEDs** (Specific Consumers Exposure Determinants) published in June 2015
- **Improved Use maps** and **SWEDs** (Specific Worker Exposure Descriptions) published in October 2016
- **On-going**: finalization of the SUMIs (Safe Use Information for Mixtures), check of older material compared with Roadmap developments, promotion of tools, engagement with registrants, ...

Organisation of the work at association level

How did we get there?



Step I – Find your champions!

- Identification of **experts** in direct **member companies**
 - *Some companies might already be involved to some extent and might have valuable inputs to start*
- Identification of **experts** from our **National Associations**
 - *Some National Associations might be more advanced than others; make sure you take their work on board*

Step II – Coordinate their interaction

- Creation of experts' Task Forces split '*per topic*', e.g. Environmental experts, Workers' exposure experts, ...
- Allocation of management time and resources to:
 - Follow the work of these groups
 - Follow ENES/DUCC activities and ensure alignment with other sectors



Organisation of the work - What are the issues ?

It is a very technical work that requires the **expertise from the companies**, BUT very difficult to motivate companies to invest resources because of:

- Availability of templates → uncertainty of timing and stability
- Overlap with other legislative deadlines, e.g. CLP in June 2015 → The work on quality of eSDS – via the Use Maps – is perceived as a priority, but there is not a mandatory requirement neither a deadline ...
 - *Explaining how the information in the use maps can be useful for the work of registrants/DUs can help*
- Uncertainty of consideration from industry (registrants), based on the experience of previous work → What can be done to ensure Use maps are used once published beyond what already there?
 - *Harmonized template*
 - *ECHA library*
 - *Cefic/ECHA/DUCC joint statement*
 - *Development of Chesar input files*
 - *?*



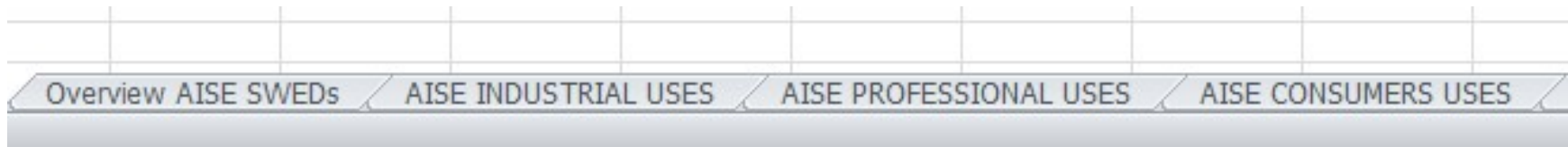
Practical use of the template – (1/6)



What is available? For whom?

A.I.S.E. has published Improved Use Maps that cover **uses of cleaning products at industrial sites, by professional workers and by consumers.**

This information is available in a single Excel file:



These use maps cover ca. **80% of the typical uses** of detergent products and they should be taken into account by suppliers of ingredients used to formulate cleaning and maintenance products, such as **Solvents, Surfactants, Waxes, Bases/Acids, Builders, Additives, Fragrances, Bleaching agents, Brighteners, Cleaning agents, Propellants, non-motive (blowing agents) ...**



Practical use of the template – (2/6)

Split into uses and Contributing Activities (CAs)

Agreeing on the overall structure of the use maps required a lot of discussions

- What approach can fit all the different life cycle stages (LCS)?
- When are we facing two different uses, when two different contributing activities?
- How much detailed should the use maps be?

A.I.S.E. use maps have been structured per LCS and per product category. No further combination of activities has been included as our initial testing led to > 150 possible combinations.



Practical use of the template – (3/6)

Split into uses and Contributing Activities (CAs)



Use identification and general description													Link activities to exposure assessment inputs				
Use code	Link to entry in previous use maps	Life Cycle Stage	Life Cycle Stage code	Use name	ESCom standard phrase code(s) for use name	Further description of use	Sectors of use (SU)	Product categories (PC)	Article categories (AC)	ES short title for communication	This use leads to subsequent service life (Y/N)	Reference to subsequent service life use and relevant substances (if Y in previous column)	Contributing activity (CA) type	CA name	ESCom standard phrase code(s) for CA name	CA descriptor	Exposure assessment input code for this CA
AISE_PW_001_v1		Widespread use by professional workers	PW	Professional uses; Washing, cleaning and disinfecting products	11133165906; missing		Various	PC35; PC8;		Widespread use by professional workers; Various products	no		Workers	Transfer of professional product to a container (bottle/bucket/machine); medium RMM	-	PROC8a - Transfer of substance or mixture (charging and discharging) at non-dedicated facilities	AISE_SWED_PW_8a_1
													Workers	Transfer of professional product via a dedicated system (bottle/machine); no RMM	-	PROC8a - Transfer of substance or mixture (charging and discharging) at non-dedicated facilities	AISE_SWED_PW_8a_2
													Workers	Professional uses; Use in a closed process	11133165906; 11133170626	PROC1 - Chemical production or refinery in closed process without likelihood of exposure or processes with equivalent containment conditions.	AISE_SWED_PW_1_1
													Workers	Professional uses; Use in a closed process; Occasional exposure	11133165906; 11133170626	PROC3 - Manufacture or formulation in the chemical industry in closed batch processes with occasional controlled exposure or processes with equivalent	AISE_SWED_PW_3_1
													Workers	Professional uses; Semi-closed system	11133165906; 15132135730	PROC4 - Chemical production where opportunity for exposure arises	AISE_SWED_PW_4_1
													Workers	Professional uses; (Trigger) spraying; no RMM	11133165906; missing;	PROC11 - Non industrial spraying	AISE_SWED_PW_11_1
													Workers	Professional uses; (Trigger) spraying; medium RMM	11133165906; missing;	PROC11 - Non industrial spraying	AISE_SWED_PW_11_2
													Workers	Professional uses; Spraying; medium RMM	11133165906; missing;	PROC11 - Non industrial spraying	AISE_SWED_PW_11_3
													Workers	Professional uses; Spraying; no RMM	11133165906; missing;	PROC11 - Non industrial spraying	AISE_SWED_PW_11_4
													Workers	Professional uses; Brushing after trigger spraying or brushing with tools; no RMM	11133165906; missing;	PROC10 - Roller application or brushing	AISE_SWED_PW_10_1
													Workers	Professional uses; Brushing after trigger spraying or brushing with tools; medium RMM	11133165906; missing;	PROC10 - Roller application or brushing	AISE_SWED_PW_10_2
													Workers	Professional uses; Manual application; no RMM	11133165906; missing;	PROC19 - Manual activities involving hand contact	AISE_SWED_PW_19_1
													Workers	Professional uses; Manual application; medium RMM	11133165906; missing;	PROC19 - Manual activities involving hand contact	AISE_SWED_PW_19_2
													Workers	Professional uses; Treatment of articles by dipping, soaking or pouring; medium RMM	11133165906; missing;	PROC13 - Treatment of articles by dipping and pouring	AISE_SWED_PW_13_1
													Workers	Professional uses; Treatment of articles by dipping, soaking or pouring; no RMM	11133165906; missing;	PROC13 - Treatment of articles by dipping and pouring	AISE_SWED_PW_13_2



Practical use of the template – (3/6)



Split into uses and Contributing Activities (CAs)

Use identification and general description											
Use code	Link to entry in previous use maps	Life Cycle Stage	Life Cycle Stage code	Use name	ESCom standard phrase code(s) for use name	Further description of use	Sectors of use (SU)	Product categories (PC)	Article categories (AC)	ES short title for communication	This use leads to subsequent service life (Y/N)
AISE_PW_001_v1		Widespread use by professional workers	PW	Professional uses; Washing, cleaning and disinfecting products	1113316590 6; <i>missing</i>		Various	PC35; PC8;		Widespread use by professional workers; Various products	no



Practical use of the template – (3/6)



Split into uses and Contributing Activities (CAs)

Link activities to exposure assessment inputs				
Contributing activity (CA) type	CA name	ESCom standard phrase code(s) for CA name	CA descriptor	Exposure assessment input code for this CA
Workers	Transfer of professional product to a container (bottle/bucket/machine); medium RMM	-	PROC8a - Transfer of substance or mixture (charging and discharging) at non-dedicated facilities	AISE_SWED_PW_8a_1
Workers	Transfer of professional product via a dedicated system (bottle/machine); no RMM	-	PROC8a - Transfer of substance or mixture (charging and discharging) at non-dedicated facilities	AISE_SWED_PW_8a_2
Workers	Professional uses; Use in a closed process	11133165906; 11133170626	PROC1 - Chemical production or refinery in closed process without likelihood of exposure or processes with equivalent containment conditions.	AISE_SWED_PW_1_1
Workers	Professional uses; Use in a closed process; Occasional exposure	11133165906; 11133170626	PROC3 - Manufacture or formulation in the chemical industry in closed batch processes with occasional controlled exposure or processes with equivalent	AISE_SWED_PW_3_1
Workers	Professional uses; Semi-closed system	11133165906; 15193135780	PROC4 - Chemical production where opportunity for exposure arises	AISE_SWED_PW_4_1
Workers	Professional uses; (Trigger) spraying; no RMM	11133165906; <i>missing;</i>	PROC11 - Non industrial spraying	AISE_SWED_PW_11_1
Workers	Professional uses; (Trigger) spraying; medium RMM	11133165906; <i>missing;</i>	PROC11 - Non industrial spraying	AISE_SWED_PW_11_2
Workers	Professional uses; Spraying; medium RMM	11133165906; <i>missing;</i> <i>missing;</i>	PROC11 - Non industrial spraying	AISE_SWED_PW_11_3
Workers	Professional uses; Spraying; no RMM	11133165906; <i>missing;</i> <i>missing;</i>	PROC11 - Non industrial spraying	AISE_SWED_PW_11_4
Workers	Professional uses; Brushing after trigger spraying or brushing	11133165906;	PROC10 - Roller application or brushing	AISE_SWED_PW_10_1

Practical use of the template – (4/6)



Link with RMMs and OCs

To facilitate the understanding of the different SWEDs available at a glance we have included an overview in the Use Maps:

Overview A.I.S.E. SWEDs covered in these use maps, Version October 2016

Relevant use descriptors			Exposure assessment inputs				
SWED	LCS	PROC	Duration per day (min)	Outdoor	LEV?	Respiratory Protection	Protection of hands (gloves)
AISE_SWED_PW_8a_1	PW	PROC8a	60	No	No	No	Yes
AISE_SWED_PW_8a_2	PW	PROC8a	60	No	No	No	No
AISE_SWED_PW_1_1	PW	PROC1	480	No	No	No	No
AISE_SWED_PW_3_1	PW	PROC3	480	No	No	No	No
AISE_SWED_PW_4_1	PW	PROC4	480	No	No	No	No
AISE_SWED_PW_11_1	PW	PROC11	60	No	No	No	No
AISE_SWED_PW_11_2	PW	PROC11	60	No	No	No	Yes
AISE_SWED_PW_11_3	PW	PROC11	480	No	No	No	Yes



Practical use of the template – (5/6)

Descriptions and naming

Main principle: Keep it simple!

Populating the more descriptive fields and assign detailed names can clarify applicability of Uses/SWEDs, but with the previous use maps we had the feedback from A.I.S.E. members that they couldn't easily use them because they were too specific and adding details, even if as example, was perceived down the chain as an actual limitation to their applicability.

Downside: when the PROC assigned are very generic, e.g. PROC 4, it can be difficult to understand what it is done with the product.

→ Users' experience and ESCom Phrases development should help us to improve and close communication gaps!



Practical use of the template – (6/6)

Providing use names and CA names and role of ESCom Phrases

- Difficulty to decide *at which stage to include the details on the process description*: in the 'Further description of use', in the CA name, in the optional fields or just leave them to the SWEDs? It depends also on *uncertainty on where the registrant will look in the use maps for the information needed*
- Difficulty in **aligning** naming, level of details in the different tables (use maps, SWED...) **without repeating** ...
- **Level RMM** : Difficulty to *indicate (and how) that the activity is the same, but it can be carried out at different level of RMMs*, e.g. application by spraying, in one case the facility has an LEV system, while in other cases only PPE available → how should this be reflected in the use maps? Via CA name? Via SWED name?
- **ESCom Phrases**: the smart template provides a very good starting point for ESCom phrase assignment (also SWED one!). However, not all phrases available, especially for names. Beyond this:
 - *If a new ESCom phrase is developed, will its code inclusion in the use map be considered as an update?*
 - *Stability in ESCom already existing phrases is essential*