SUMIs – Safe Use of Mixtures Information for end-users

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DUCC Mixtures TF
Workshop on Use Maps package
12 May 2016

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Reminder on the “Bottom-Up” approach

The concept

- Define relevant uses of mixture
  - Pre-defined “packages” with UD + OC/RMM, per relevant sector use
  - Harmonised templates (improved use maps + SWEDs)
- Define applicability domain
  - Substance free!
- Check incoming substance SDS vs. SWED
  - “Validation”
- Select and send output i.e. the SUMI
  - Simple advice to industrial and professional end-users

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.

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

Reminder on the “Bottom-Up” approach

The elements

SWED
Sector-specific Worker Exposure Description

- 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

Sector association

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 not 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 use or contributing activity level

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

- Will ideally be **translated**

### SUMI: agreed format

<table>
<thead>
<tr>
<th>Mandatory SUMI content</th>
<th>Optional SUMI content</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SUMI</strong>: Safe Use of Mixtures Information for end-users</td>
<td><strong>Good practice advice</strong></td>
</tr>
<tr>
<td><em>Sector_SUMI_code</em>: Title of SUMI</td>
<td>If relevant, applicable (sector-specific) good practice advice</td>
</tr>
<tr>
<td>General description of process covered</td>
<td><strong>Use of pictograms when available</strong></td>
</tr>
<tr>
<td>May include use descriptor codes or reference to SWED</td>
<td>To include references to other relevant sections of SDS or product label</td>
</tr>
<tr>
<td><strong>Operational Conditions</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Maximum duration:</strong> xx min.</td>
<td></td>
</tr>
<tr>
<td><strong>Other:</strong> xxx</td>
<td></td>
</tr>
<tr>
<td><strong>Risk Management Measures</strong></td>
<td></td>
</tr>
<tr>
<td>Required RMMs, use of pictograms</td>
<td></td>
</tr>
<tr>
<td>Reference to Section 8 of SDS for RMM specifications</td>
<td></td>
</tr>
<tr>
<td>If applicable: any environmental measures</td>
<td></td>
</tr>
<tr>
<td><strong>Disclaimer</strong></td>
<td></td>
</tr>
<tr>
<td>Disclaimer on boundaries of SUMI use</td>
<td></td>
</tr>
</tbody>
</table>

**NOTE**: This format is still subject to (minor) editorial changes.
SUMI Adaptation by Sector Associations

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

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
Thank you for your attention!

Questions?

Downstream Users of Chemicals Co-ordination group

www.ducc.eu