



Description of uses in the context of applications for authorisation

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Definitions

- **Use**: means any processing, formulation, consumption, storage, keeping, treatment, filling into containers, transfer from one container to another, mixing, production of an article or any other utilisation - Art. 3(24)
- **Identified use**:
 - as defined in Article 3(26) and referred in section 3.5 of Annex VI
 - described in the Registration dossiers
- **Use applied for**:
 - the use for which an authorisation is sought/(not) granted (Articles 62(4)(c)/ 60(9)(c))

Use description – Scope and level of details

A use description can be characterised by:

- its scope = the area of use covering a number of:
 - market sectors (textile, mining, agriculture...)
 - processes/activities (mixing, spraying, calendering...)
 - chemical products/articles categories (adhesives, furniture...)
 - life-cycle stages
- its level of detail = the precision of the information contained:
 - in the **name** of the uses applied for (including elements that highlight certain conditions of use)
 - in the **exposure scenarios** (conditions determining exposure + technical explanations/specifications)

Use descriptor system

- Practical advantages:
 - harmonisation/standardisation
 - wording blocks to build up a **use name**
 - ensure linking between the use name and the ES, EE, RC
 - TIER1 input parameters to exposure estimation tools (Ecetoc TRA, ConsExpo, EUSES...)
 - compatible with the CSA software (CHESAR)
- ECHA recommends it for the description of uses applied for

Use descriptor system, (just) a starting point...

- Might not be adapted to certain specific processes or substances
- Level of detail of descriptors not always sufficient for a comprehensive description of a “use applied for”
 - applicants can include as free text (in the use name and ES) more precise information
 - subcategories can be helpful
- A set of descriptors (e.g. built for registration purposes) may cover more than one use

Examples

- For descriptors set [SU 3; PROC 7; ERC 5; AC 11], a use name can be:
 - « *Industrial use as a pigment in paints to be applied by spraying techniques onto wood articles* » from descriptors' wording only;
or
 - « *Use as a UV-resistant pigment in water-borne paints to be applied manually by industrial workers with High Volume Low Pressure spray systems onto wood furniture* »
- [SU 3; PROC 7, 10; ERC 5; AC 11]:
 - PROC 7 = industrial spraying
 - PROC 10 = roller application or brushing

Description of uses – Messages to applicants

- The Use Descriptor System is, in most cases, a good basis to start building a use name/description, but it may also be insufficient to provide the necessary level of detail
- In the use description, the function of the Annex XIV substance is a key
- Coherence/Consistency between the use applied for and the different parts of an application should be ensured (concept of « use-oriented data set »)

ECHA technical advice on how to describe uses

- Published on 14 June 2011 on ECHA web site
- It is technical advice, based on examples, but not a guidance document
- Follows the principles listed in previous slides
- Will be updated when necessary, on the basis of experience/feedback

Broad information on uses

- Objective: to collect, for uses applied for, information on possible alternatives, from interested third parties (art. 64(2))
- What comes after the public consultation:
 - SEAC has the right to require/request further information on possible alternatives to the applicant/interested third parties
 - information will be taken into account in ECHA Committees' opinions (decision criteria/conditions and review period)
- Constraints:
 - tight deadlines: for ECHA to develop, for third parties to comment and for Committees to assess and formulate opinions
 - information may be sensitive (Confidential Business Information)

Broad information on uses

The consultation process

Objective: a meaningful and efficient consultation

