

Points for the working session on use maps: Group 1 report

ENES8
21 May 2015

ECHA



Participants: distributors, ECHA, R/DU metal sector (no use maps), DUCC, MSCA, consultant working for R (part of testers last year)

TIMING:

- **OK to publish the template now**
- **Having the use maps populated only once the different elements are available. Sectors don't want to work twice.**
 - **Question asked:** would it be worth to start populating the template now, even if not all elements are available, i.e. just the use description part? Maybe sectors could start so that they understand e.g. the gaps in information? Maybe sectors could prioritise: work first on the uses for which they know there are substances of more concern?

NEED FOR FURTHER TESTING?

SMALL SCALE TESTING?

- **Possible to do some small scale testing with sectors that have already SCEDs and spERCs available, even if using the old use codes**
- **Looks easy to pick one use, re-run the assessment with the new elements and then compare the outcome**

ECHA and Improved Use Maps WG ready to coordinate this testing – volunteers are welcome

- **PROPOSED TEMPLATE**

- **Does it help R to select the right use, e.g. with new optional column for indication of generic composition?**
 - **Past registrations / Experience from consultant: need to go back to R. Sometimes R may need to go back to his DUs. If not possible: will go to worst case.**
 - **Common practice seems to be that some Manufacturers select some key costumers to try to ensure representativeness of the uses they will cover**
 - **Authorities would like to have better information on uses. The additional information is always helpful.**

Conclusion: this is an important question to ask to R in the small scale resting: what would you like to receive from DU for targeting your assessments, to cover only the relevant uses?

Possibility: DU sectors to work on harmonised description of uses

for e.g. formulation stage, transfer operations, ...

- **Seems desirable.**
- **DU/formulator would receive only one ES corresponding to this life cycle stage**
- **Seems feasible, but 'control banding approach' would be needed, i.e. to have different bands depending on DNELs**
- **Maybe these kind of harmonised use descriptions are more relevant for distributors?**
- **Need to explore further between involved sectors**

Is it important to try to include ESCOM phrases?

- **Yes, it seems very desirable.**
- **But important to include the ESCOM code already at the use map level.**

Other comments:

- **Authorities like use maps to see information on what the sectors are doing. Good source of information. Clarification.**
- **Concerns that old codes should be maintained, keep correlation with 'old' use maps**

Points for the working session on use maps: Group 2 report

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- **What could be a realistic timing for development and use?**
 - Transfer of old to new use maps expected to be different according to sector in difficulty, with respect to workload, complexity etc.
- **Is the template perceived as complex?**
 - Considered to be fit for purpose, and propose to use/test as currently is
- **Is the information available at DU association level?**
 - Overall there are two, not completely matched approaches - that of DU/sector who is product focussed and the registrant who is substance focussed with a cross sector point of view. Ideal if two interact / cooperate but this is more difficult than would be expected.
 - There is commonality/duplication in use maps across sectors-the same use and contributing tasks but with different names. There is potential for harmonisation/consolidation but it was difficult to see a viable way to do this.

- **Alignment with other initiatives under development:**
 - It is not essential that SWED template, SPERCs, SCEDs, be finalised before testing, but that their core content be agreed
 - R12 updates not likely to have big impact on verification stage and expect to be stable when filling templates
- **What can we learn from previous experiences?**
 - Since implementation ca 2010, some have been active with revisions, updates, consolidations and other have been static. It would be interesting to understand what elements make the difference.
 - Codes were not always understood by DU's – informed registrants of uses that were not the « right » ones after all

- Discussed whether registrant would pick and choose use maps, or simply run all. Advantage with running all is simplicity (no decision making) and comprehensiveness. Drawback is large number and duplication. It is also linked to earlier point about harmonisation of cross sector common tasks
- SST is not considered an informative name – can be simply a jumble and difference between titles can be very subtle, and hard to see.
- Question of dealing with different concentrations that would give rise to different CoU was raised. SUMI based approach leads to providing the CoU, then the assessment give the maximum concentration at which it can be used (analagous to Msafe logic)
- Dealing with same tasks but with substances of different hazard levels likely to be dealt with as separate use, but would need to be checked.

Improvement of the assessment:

Chesar is considered to be a useful tool that can lead to greater harmonisation, both in how CSR/ES are structured and in ES for Communication

Points for the working session on use maps: Group 3 report

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How to ensure use maps are developed and used?

- Use maps serve Use reporting by DU to M/I
- Use maps are for common uses, specific or confidential uses continue to be 1:1 communication
- Both DU organisations and individual DU can use it
- Use maps correspond to mixtures: level of granularity depends if different assessments are needed, link to substance cannot be systematically provided
- Use maps will improve communication in ES
- No plan to merge all use maps from all sectors
- Use maps useful for any CSR update but do not trigger the update per se
- **IDEA**: existence of use maps flagged in IUCLID (e.g. pop ups)?
- **IDEA**: Integrate use of use maps in the 2018 Registration Roadmap (inform LR/SIEF)

Elements to verify

- Use description part: more cross-references between R12 and use maps guidelines or examples (e.g. explain service life, e.g. carbon black for tyres)
- Correspondance: e.g. PROC vs SWED, ERC vs SpERC, PC vs SCED.
- Additional information: optional, DU can add more columns to avoid overpopulating column S with a lot of free text (e.g. physical form)
- Generic composition by TF: in use map? In SWED? In SpERC?

NEXT

- **Identify systematic flows via testing a couple of cases, a couple of lines only, make sure we cover the extremes**
- **Different sectors so that sector-specificity is assessed**

Points for the working session on use maps: Group 4 report

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- ***A lot of ongoing activities which are linked to each other.***
 - *Guidance R.12*
 - *use map format*
 - *SWED template*
- *As long as there is no stable situation based on approved formats the sectors are not motivated to update their use maps.*
- *After approving the basic documents they should be “frozen” for a certain period of time to collect experiences for an update after a meaningful period*

Use Maps – Practical implementation

- *Centralised database (at ECHA?) required*
 - *relevant documents basis for the use map building*
 - *possibility to upload sector-specific use maps.*
 - *This website should be maintained independent of the different sector associations. Managing of changes*

- ***In some sectors the motivation is missing***
 - *work on use maps is not always a priority issue in certain sector (associations).*
 - *It is not easy to motivate the experts needed for the detailed work.*
 - *Some sectors are not convinced about the benefit of use maps*
- ***Clear Message from ENES needed***
 - *Benefit of sector use maps for M/I **and DU***

Thank you

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