

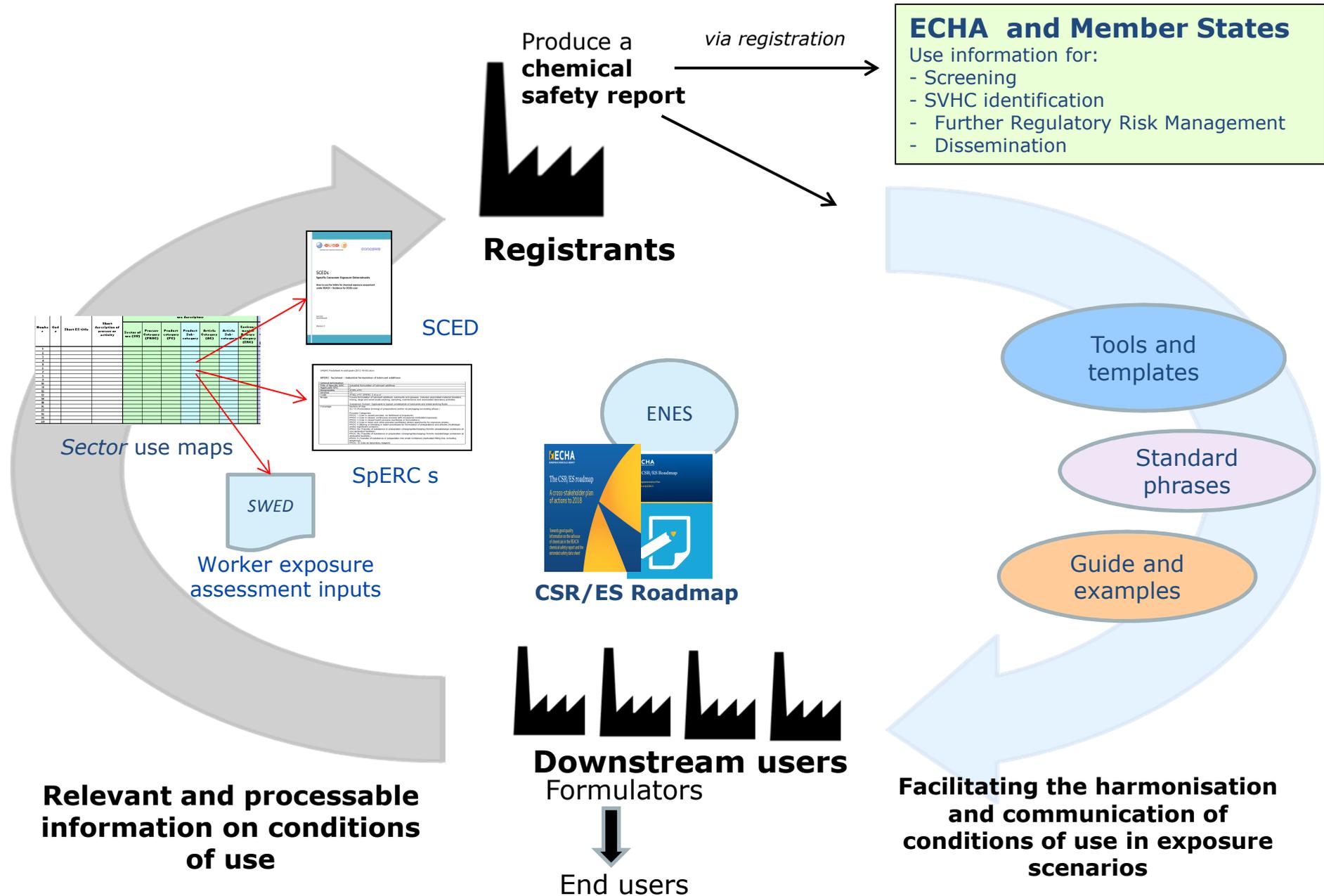
Conclusions and next steps

Exchange Network on Exposure Scenarios (ENES8)

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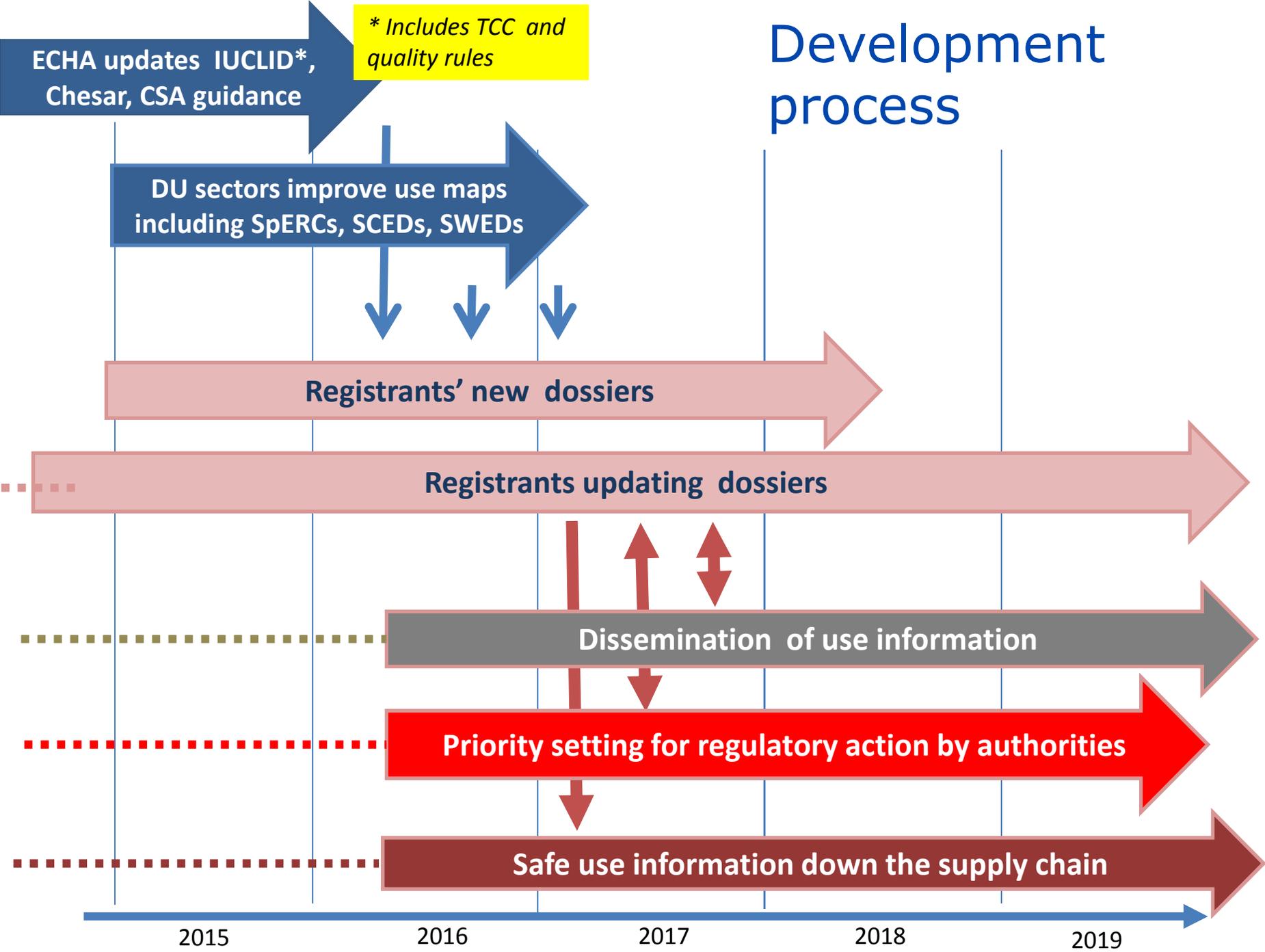
Improving the quality of information available



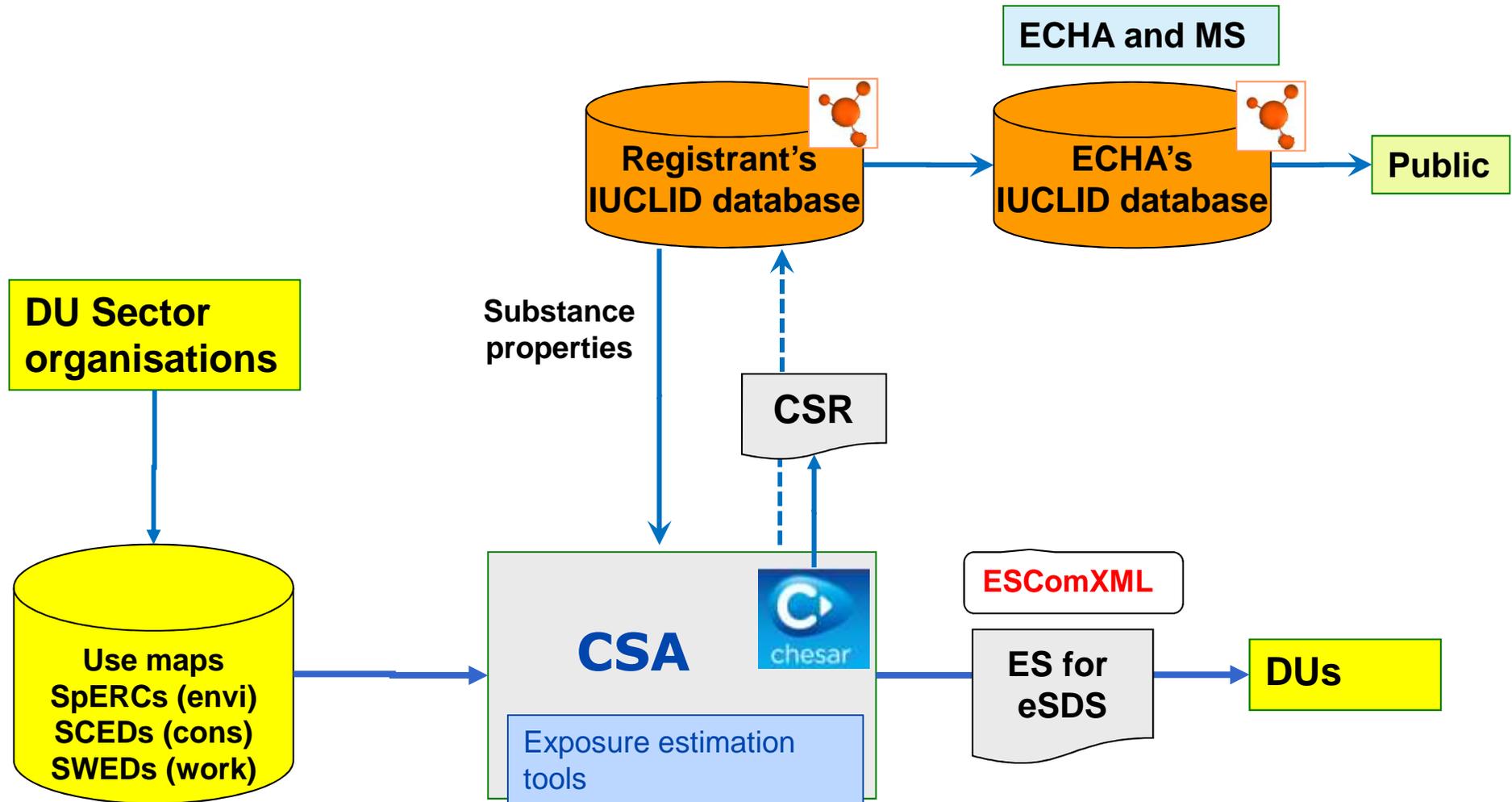
Conclusions (1)

- Many presentations used similar visualisation of the “system” (communication cycles); understanding converges;
- Much progress made on key elements since 2013 (concepts, methods, “formats”, tools, EScom 2.0 package)
- Spread the word beyond the ENES community
- including (updated) **contents** still to follow (2016)
- Lot of work –
 - price to pay for risk based system
 - be realistic in ambition level and managing the changes
 - need of signals/examples that the investment will pay
 - Timing for managing the changes is key for success (long term process)
- Connect to Chesar and other CSA tools
- Connect to SDS generation systems

Development process



Information flows around the CSA



Conclusions (2)

- Depending on where a substance stands post-registration process, update of use/exposure information may be needed.
 - From just “cleaning” of use description to re-write of CSR based on site assessments (improving working practice)
 - Already at screening stage authorities rely on information in the registration dossier
 - With more transparent screening criteria it is predictable for registrants where to set priorities in updating existing dossiers.
 - Keeping the dossier up-to date is in companies interest. Build into the business strategy.

Conclusions (3)

- Information on the extent of different uses (in terms of tonnage) is seen by authorities as essential for good quality priority setting
 - Collecting appropriate tonnage information is a major challenge to industry
- Information on tonnage also needed to determine releases for the environmental assessment

Conclusions (4)

- Examples of benefits of REACH information for implementation of other legislation
 - PNECs and REACH safety assessment methodology
 - REACH adds the upstream communication
- Development needs for ES from enforcement perspective (ENES contributes to solutions)
 - Still not many extended SDS at end-use level
 - Content quality issues observed: too general; inconsistent with CSR; inconsistent across registrants; over-stringent (very low RCR); scaling input information missing;
 - Guidance needed to better address the interface between REACH and other legislation, more examples would be helpful
 - Harmonised, human readable format of ES desirable
 - Extraction of ES from CSA to SDS systems (consistency, selection of info, phrasing of info)

Conclusions (5)

- Feedback to LCID
 - Very useful and broad feedback
 - Clarification: LCID provides some rules; still assessor needed to check the outcome
 - Improvement of product envisaged
 - Exemplify output in SDS
- Round robin testing of LCID; volunteers

Conclusions (6)

- Updating sector use maps (including SWEDs, SCEDs, SpERcs and links to communication forms) - various potential benefits for registrants and DUs; also useful for authorities.
 - Typical conditions (not all use situations);
 - Open question: What to do in areas of the market where no (active) sector organisations exist. How to identify, prioritise and reach them?

Conclusions (6)

- EScom 2.0 Standard phrases and xml available
 - Phrase catalogue is dynamic; xml frozen for 2 years
- Actions needed for implementation
 - at company level and at IT providers level
 - gathering feedback from customers
 - sectors to support companies and phrase development
 - assessment tool owners
 - phrase group to be maintained

Conclusions (7)

- Distributors have started to take on board new services (training and advice) for their customers to make REACH information reach the customers in appropriate form. Model for other sectors ?
- Bottom up approach (SUMIS and SWEDs):
 - SUMIS driven by information needs at end-use (worker instruction card format; complementing the SDS); readable version of the SWED and potentially SpERC;
 - Formulator can validate received ES against SWEDs

Steps towards ENES 9

- SWED and SUMI template ready; SpERC a bit later
- Further develop and verify/test formats for use-maps?
- Build more common understanding on needs and means for appropriate tonnage information and focus work on methodologies for deriving appropriate tonnage information
- Update LCID guidance and carry out round robin testing (volunteers needed)
- Prepare publication of use description guidance R.12
- IT providers prepare delivery of ESCOM package
- Share lessons learned from authorisations and its relevance for ENES
- Publish practical guide of DU CSR
- Reach consensus on role and boundaries of scaling

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