

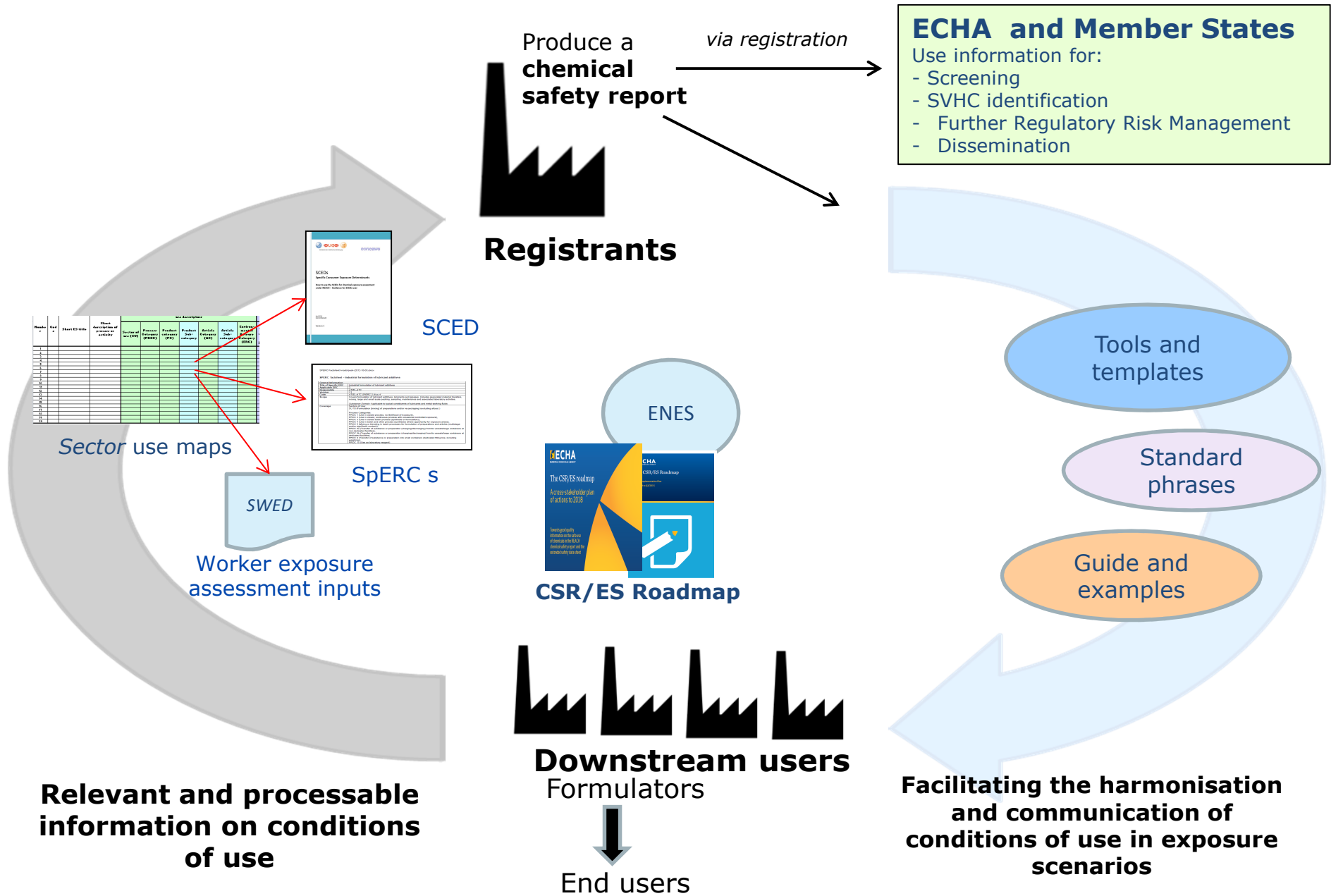
Conclusions and next steps

Exchange Network on Exposure Scenarios (ENES8)

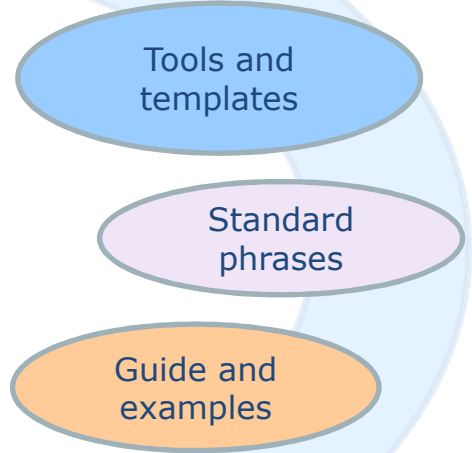
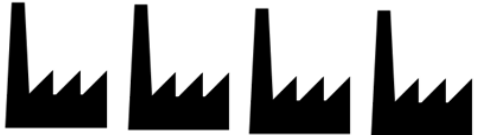
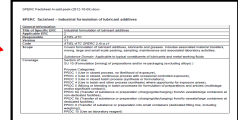
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21 May 2015



Improving the quality of information available



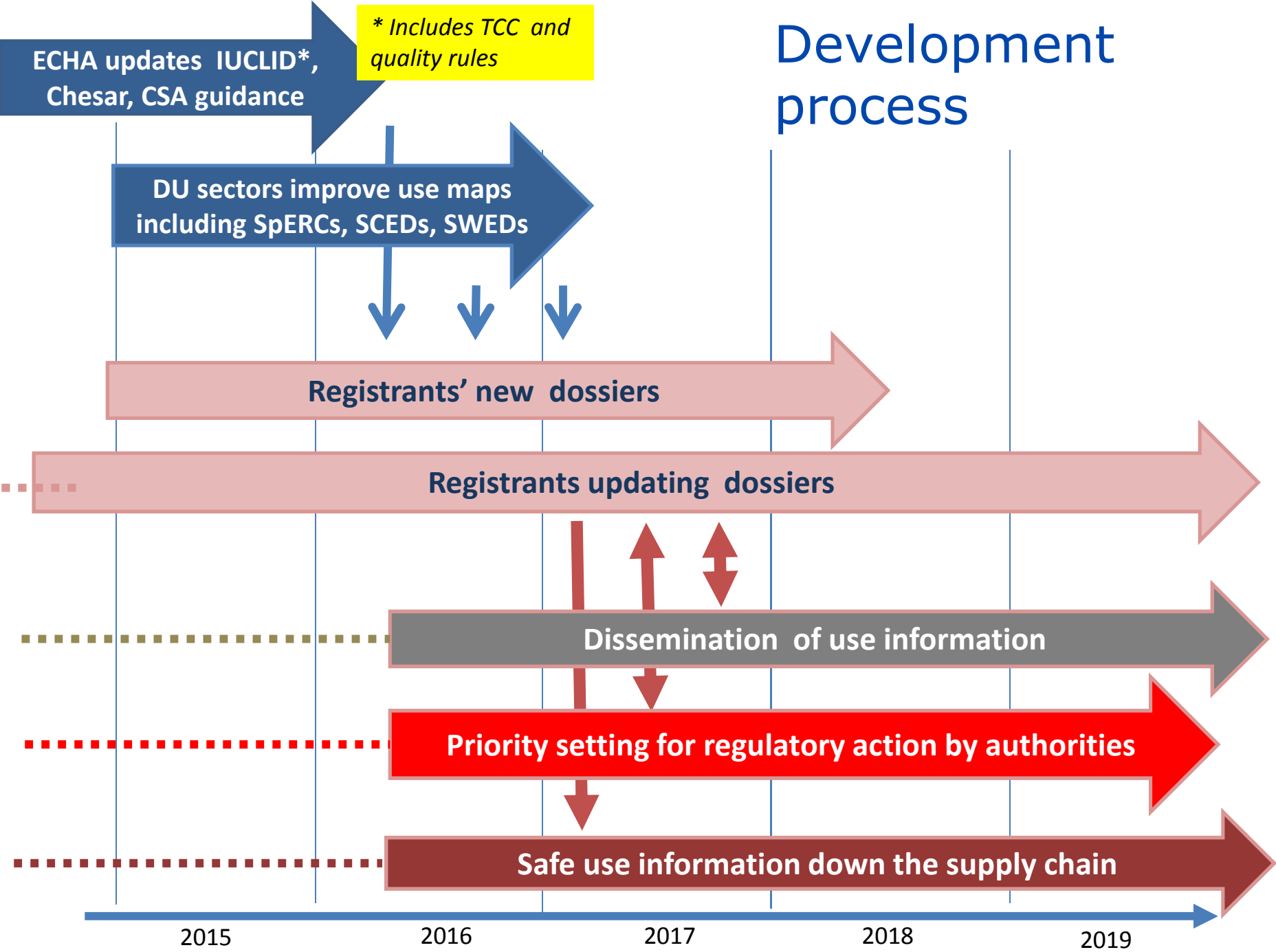
Rank	Ref	Short ES title	Short description of previous activity	Process use map (PUM)	Process exposure (PE)	Product use map (PUM)	Product exposure (PE)	Activity use map (AUM)	Activity exposure (AE)	Exposure scenario (ES)	Exposure scenario (ES)
1											
2											
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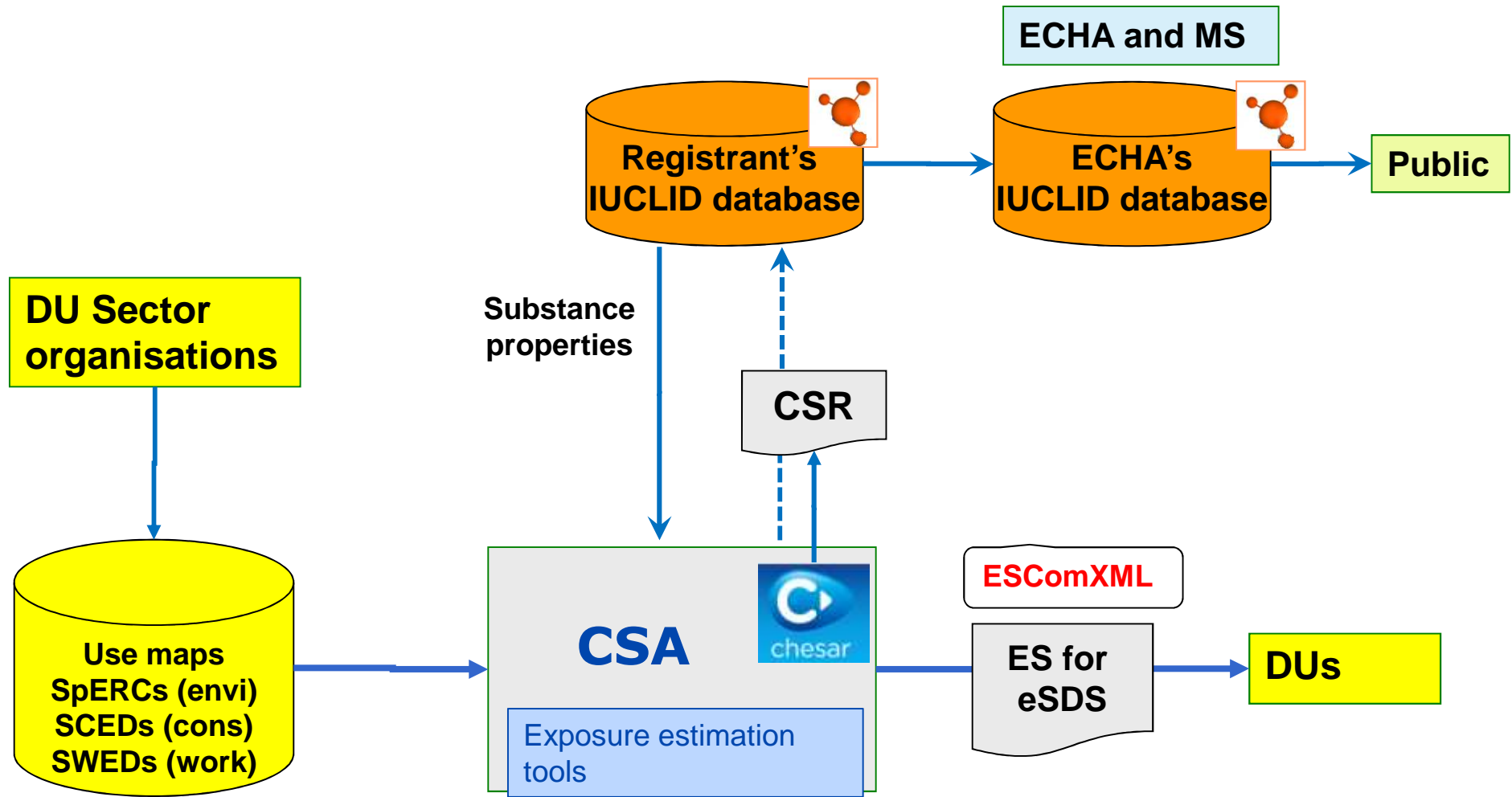
Conclusions (1)

- 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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