

Practical Guide for DU CSR

ENES 8

21 May 2015

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European Chemicals Agency



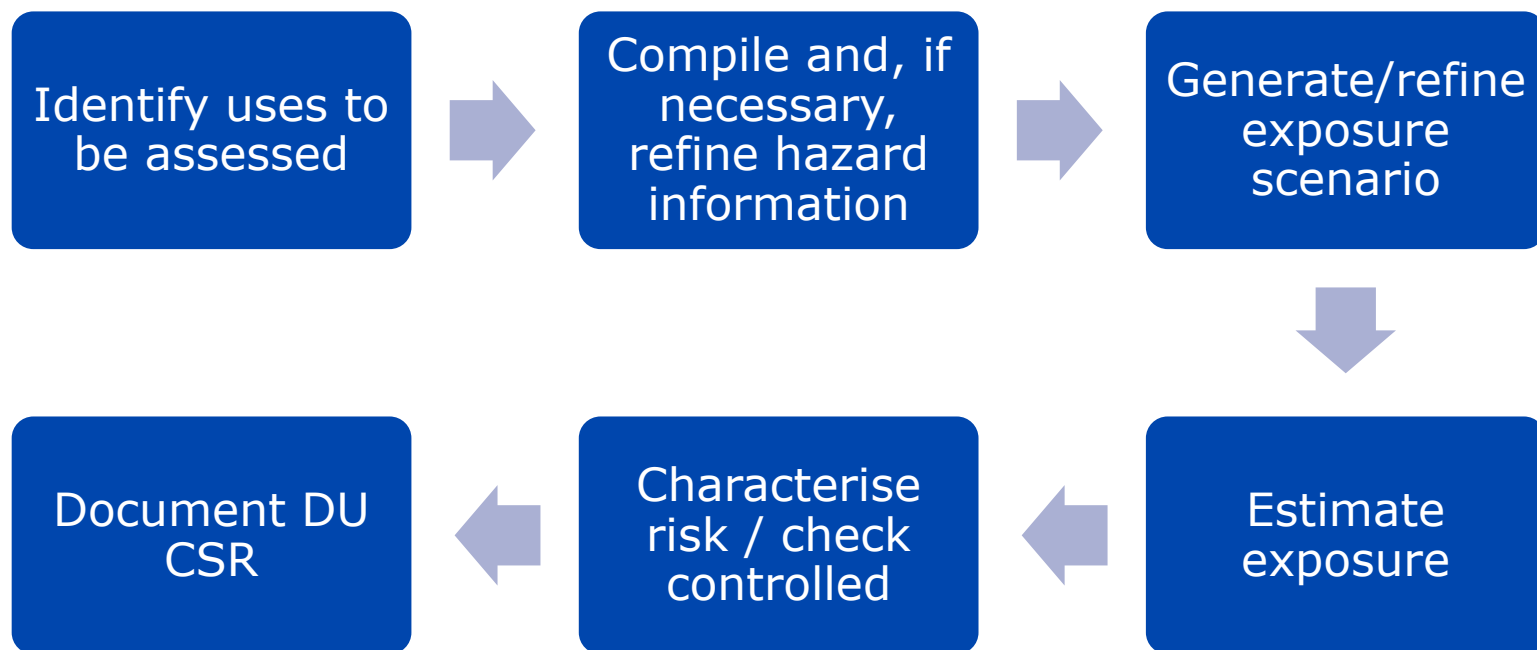
Practical Guide on DU Chemical Safety Report

- Aims to support Downstream users who choose to prepare DU CSR
- Does NOT aim to promote DU CSR as the first option when use is not covered
- Developed with input from DU CSR task force / Roadmap Action Area 4.5 (DUCC lead)
- Expected publication Q3 2015
- DU CSR/ES Roadmap Action 4.5

Three possible bases for DU CSR

- A: Supplier Exposure Scenario
 - ES/CS received for the use but conditions of use differ
- B: Sector Exposure Scenario
 - A sector ES/CS is available, with exposure estimates and your substance properties and conditions of use are within the boundaries of that scenario
- C: Own Exposure Scenario
 - Suitable for all situations, especially when approaches above are not feasible

Common framework for all approaches



A: Supplier Exposure Scenario

Generate/refine
exposure
scenario

- Base it on supplier ES/CS
- Similar to checking ES

Estimate
exposure

- Recalculation tool *or*
- Same exposure estimate tool as supplier

Document DU
CSR

- Usually can be simple
- Cut/paste from recalculation tool

First choice if feasible. Low complexity

B: Sector Exposure Scenario

Generate/refine
exposure
scenario

- Base it on sector ES/CS
- Substance and conditions of use must meet the boundary conditions

Estimate
exposure

- Take exposure estimate from sector information provided

Document DU
CSR

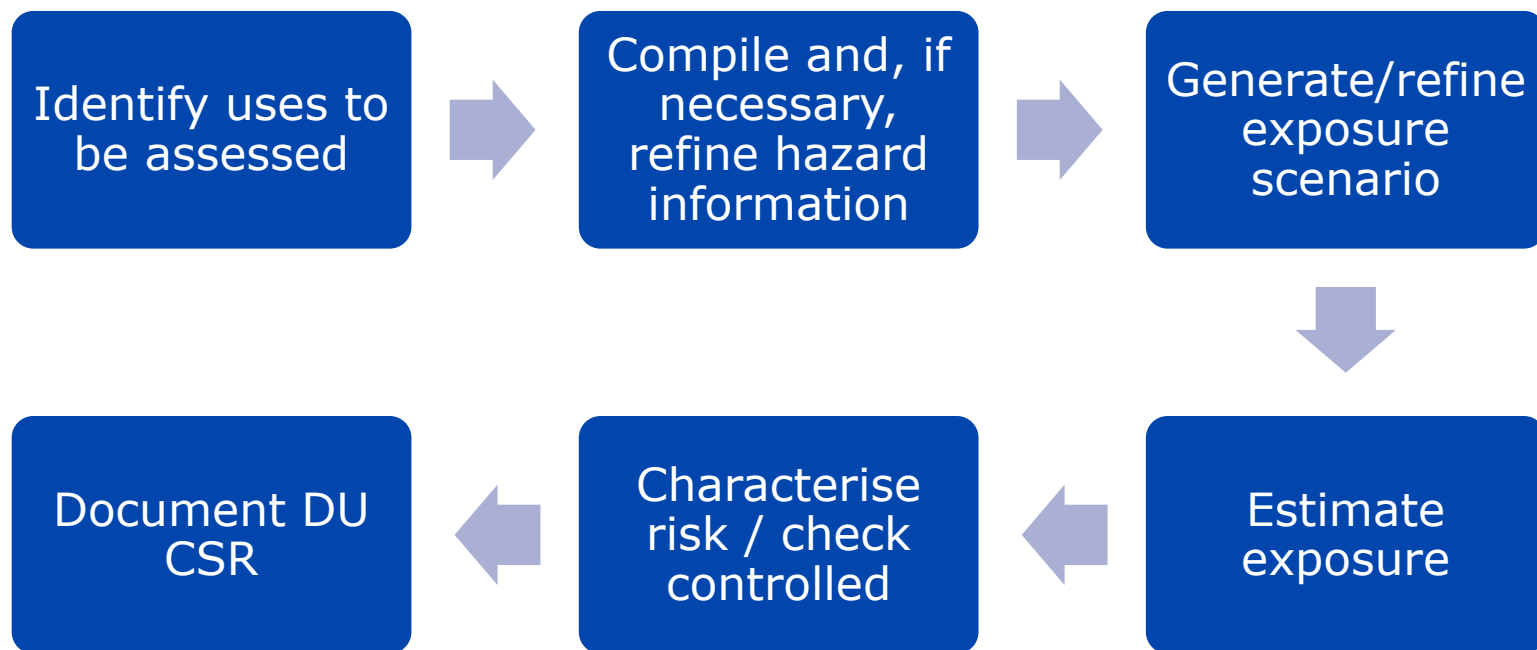
- Report framework could be provided by sector

To be developed by sector organisations

C: Own Exposure Scenario

- Assessment from “first principles”
- This approach is taken when:
 - other approaches not feasible *or*
 - hazard refinement necessary *or*
 - measured data available *or*
 - complexity arises *or*
 - DU familiar with CSR preparation for registration *or*
 -
- Complexity of assessment and documentation varies with situation

C: Own Exposure Scenario

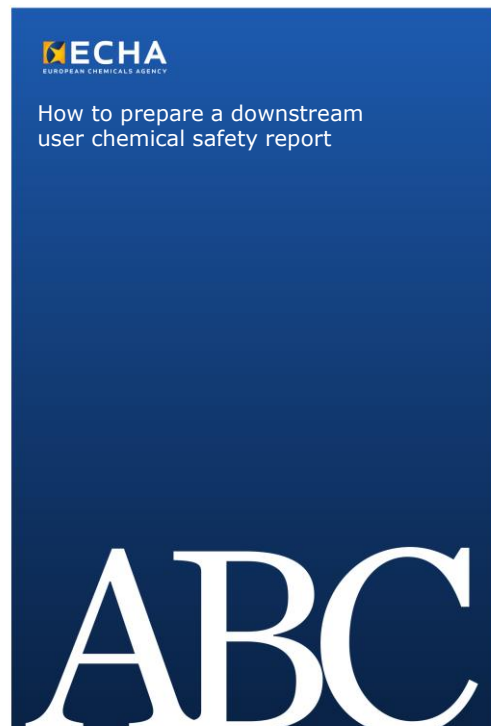


Likely to require greater competence than the other approaches

Worked Examples

- A: Supplier Exposure Scenario Approach
- C: Own Exposure Scenario Approach
 - Using modelled data
 - Using measured data
- Likely that links to templates will be provided

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 - DU CSR and communication downstream
8. Report to ECHA
 - Examples in appendix

Current status: third external review June

Follow on activities

DU CSR/ES Roadmap Action 4.5

lead: DUCC DU CSR TF

- Identify unresolved issues and consider how to address them (Q4/2015)
- Promotion of DU CSR Practical Guide (Q3/2015)

DU CSR/ES Roadmap Action 4.6

lead: ECHA

- Report on the amount and nature of downstream user reports submitted to ECHA in Q3/2015.
- Identification of changes to reporting by Q4/2015 (reporting streamlined ca. 2017)

Thank you!

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