Tonnage Estimation per Use

CSR/ES Roadmap Action 2.6

Joint Task Force Cefic/VCI
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**Tonnage per Use** *(Roadmap action 2.6)*

**Relevant action(s):**
- Analysis of current situation.
- Identification of interaction with IUCLID update.
- Clarification of needs of authorities.
- Balancing availability of data / authorities needs.
- Providing available tools/methods.

**Purpose of the work:**
- Impact on IUCLID, options/limitations to support prioritization process of authorities.
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1. Analysis of current situation
   • Tonnage per use information in registration dossiers: manufacture/imported tonnage and available exposure scenario input data
   • Registrants‘ strategies and needs for CSA
     • Tiered approach to retrieve save use conditions including tonnage applied.
     • DU flexibility via „broader scenario“ – communication of Msafe.

⇒ Substance specific dossier data is not intended for comparison i.e. prioritisation among substances.
2. Review of ECHA‘s and proposed screening for substance:

- Where is tonnage per use information to come into mass screening?
- Is tonnage per use useful in a prioritization process?
- Is there added value to justify a huge effort to report CSR information in IUCLID?

⇒ TF saw the need for introducing new fields (IUCLID) on substance level, cumulated tonnage in life cycle stages and focus on regional relevance.
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New IUCLID fields:
Cumulated tonnage data field for end uses
- At industrial sites.
- Widespread uses by professionals.
- Consumer uses.
- Service life.
Each with additional data and options for further explanations:
- EU-wide value or registrant specific?
- Source, Method of acquisition etc.
Additional refinements required by ECHA e.g. distinguish:
- SCC and non-SCC uses.
- Widespread and wide dispersive uses.
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The proposal applying cumulated tonnage values is developed and discussed with ECHA.

Options for cumulation of tonnages with same fate maintains flexibility in individual uses / exposure scenarios within a dossier and allows comparison among substances at the same time.
3. List of Methods

Methodologies for estimating substance tonnage per use:

• Collection of methods:
  Industry sector databases, Commercial market survey, Authority databases etc.

• All stakeholders are invited to contribute to the method acquisition.

• For evaluation of the methodologies a questionnaire/template will be issued.
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Current draft of method evaluation questions

- What kind of “Tonnage per use” is reported: real, strategic, based on any method? including statistics, calculations, assumptions.
- Strengths and weaknesses, limits, advantages.
- Domain of applicability.
- Documents available, source of information.
Thank You