



Tonnage Estimation per Use

CSR/ES Roadmap Action 2.6

Joint Task Force Cefic/VCI
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Holger Leidreiter

The logo for the CSR/ES Roadmap, consisting of a yellow rectangular background with the text "CSR/ES Roadmap" in blue, and a blue and yellow abstract shape on the right side.

CSR/ES Roadmap

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.**

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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.

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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