Communication in the supply chain – distributors‘ challenges

ECHA – ENES Meeting
24-25 November 2011, Brussels

Dr. Uta Jensen-Korte,
Director General, Fecc
Chemical Distribution

REACH & CLP affects the entire supply chain
Chemical Distributors play a key role in the use coverage

- MANUFACTURERS / IMPORTERS
  - Properties of substances and safe uses

- DISTRIBUTORS
  - Information on uses of substances
    - Top-down preferred

- DOWNSTREAM USERS
Chemical Distributors may have different roles

- Distribution, import, downstream use or even manufacturing
Distributors

Main obligations and challenges:

• Information flow up and down the supply chain
  - receive from manufacturer/importer information about properties of substances & safe uses and inform downwards
  - receive from downstream users (DU) information about the uses and inform up the supply chain, if needed
  - top-down information flow preferred for 2013 registrations

• Check that own uses are covered

• No legal requirement to check that DUs’ uses are covered

• Implementation of the measures resulting from ES

• Data management
Safety Data Sheets

- SDS main tool for communication in the supply chain
  - as such no new requirement
  - New Exposure Scenarios, if required
    experience needs to be gained

- Some figures on SDSs from distributors:
  - handle up to 60,000 substances or mixtures
  - distribute up to 350,000 SDSs per year, of which
    - up to 250,000 generated in house
    - approximately 100,000 directly forwarded as received from supplier
Experience so far

- Early figures on ext-SDSs from distributors:
  - expected ext-SDSs for approx. 1000 to 1500 substances
  - received until now approx. 1000 ext-SDSs for around 170 substances
  - average six ext-SDSs per substance

- Main challenge
  - to identify the differences between the various suppliers’ ESs for the same substance and compare with own operations (own uses, OCs, RMMs)
Any difference?

Source: Brenntag
Today’s challenges

- Challenges:
  - Different formats
  - Expert judgment needed, partly lengthy and complex ext-SDSs, not easy to digest!
  - Different ESs by different suppliers for the same substance, sometimes from the same supplier, but from different legal entities
  - Missing PROC 8a, 8b and 9 (Transfer)
  - Conservative/unrealistic safety levels
  - Missing formulation stage
Today’s challenges – examples (1)

- Butyl diglycol (supplier V)
  - ✓ All relevant SU, PROC, ERC covered
  - ✓ Covers up to 100%, 8 h/day
  - ❓ Covers only 4200 kg/day per site

- Formic acid 94% (supplier X)
  - ✓ All relevant SU, PROC, ERC covered
  - ✓ No limitation of covered quantities
  - ❓ LEV effectivenes > 90% (PROC 8b: > 97%)
Today’s challenges – examples (2)

- **Potassium permanganate (supplier Y)**
  - ? Missing PROC 8a, 8b and 9 (Transfer, Filling)
  - ? Covers only 3 kg/day (!)
  - ? Covers exposure < 1 h/day

- **A solvent (supplier Z)**
  - ? Covers 7800 kg/day, but truck delivers 12000-14000 l

- **Sodium chlorite (Supplier E)**
  - ✓ ES for “Manufacturing stage” and multiple “End uses” covered
  - ? “Formulation stage” missing
Improvements & the way forward

- More consistent formats are in use
- Use Descriptor system is widely used
- Use & develop further industry standards e.g. use mapping, ESCOM XML
- Gain expertise, but what about SME’s?
- Contact suppliers helped in most cases
- Adapt your OC and RMM measures,
  - PPE ok, to adapt technical installation takes time and needs investments
- Consolidate ES information, scale ES
- Prepare an own DU CSR
- Initiate trainings jointly by authorities & industry
Further thoughts

- Do not forget the body text of the SDS (16 sections)
  - ensure consistency between both SDS parts
  - Keep in mind that information about safe use is often easier to digest as describe e.g. in section 8
- Avoid to distribute ext-SDS to final industrial or professional end users, include the information about the safe use into the body text of the SDS
- Clustering of customers into groups

We still have to learn and to gain experience!

Could we think about a simpler system at least for substances with lower hazards?
Thank you for your attention!