

Webinar on “Getting meaningful exposure scenarios: how sector use maps help” of 30 March 2017

Summary of question and answer panel

During the events, the participants to the webinar had the opportunity to ask questions on the topic to ECHA experts. The questions and answers are summarised below. Whenever appropriate, similar questions were merged and the answers were expanded and clarified. Questions not directly relevant to the topic of the webinar were excluded.

The webinar can be seen at <https://echa.europa.eu/-/getting-meaningful-exposure-scenarios-how-sector-use-maps-help>.

For additional questions on use maps or supply chain communication, please contact the ECHA helpdesk at <https://www.echa.europa.eu/contact>.

1	<p>Where can I find the use map files?</p> <p>The use maps are published on the use map library on ECHA website at http://echa.europa.eu/csr-es-roadmap/use-maps/use-maps-library. The files can be downloaded directly from the section called "Files".</p>
2	<p>Will the use map files be provided in Chesar 3 format? How about files available in previous versions?</p> <p>It is the sectors responsibility to provide their use maps (and related SPERC/SCED/SWED) in Chesar format. Files provided in Chesar 2 format can be migrated in Chesar 3 format but at present sectors focus on updating the content of their use maps.</p> <p>ECHA provides support to sectors to generate their Chesar files.</p>
3	<p>Is there a way to find out which sector organisations are currently preparing use maps?</p> <p>ECHA encourages sectors to indicate, via the use maps library, their intention to develop or update use maps (or certain elements of it). However, sectors working on use maps have not yet used this opportunity.</p> <p>To know more, you can contact DUCC (the Downstream Users of Chemicals Co-ordination Group) which coordinates the initiatives from the downstream users side.</p>
4	<p>If use maps are not developed by downstream users sectors, can registrants take the initiative to develop sector use maps and check their correctness with downstream users sectors? Are there examples of this way of working?</p> <p>Sector use maps should preferably be developed by downstream user sectors as the conditions of use should reflect current good practice in place at downstream user sites. Downstream user sectors are better placed to collect and consolidate representative information that can be then used by all registrants supplying into the sectors.</p> <p>For markets where no sector organisations exist to take initiative, registrants may take that role instead. However, experience so far shows that use maps generated upstream</p>

	tend to be too generic and do not sufficiently support the communication of safe use advice down the supply chain.
5	As a downstream user, are we legally obliged to inform our suppliers regarding our uses? Is it sufficient to communicate the uses to the sector organisation via the sector use maps?
	It is important to note that downstream users have the right to make a use known to their suppliers. This is not an obligation (REACH Article 37(2)). When making a use known, certain elements of information need to be provided. For the supplier it is much easier to take this information into account in his assessment, if the sector organisation has collected and consolidated the information from the single members.
6	As a downstream users, do I have a legal obligation to check why my supplier didn't send an extended SDS for a hazardous substance that has been registered under REACH?
	There is no legal obligation as such but it is advised to contact your supplier if you think that an exposure scenario should have been provided. See Q&A no 476 at https://echa.europa.eu/support/qas-support/qas .
7	If the library of sector use maps mentions our specific use, do we still need to communicate with our suppliers? How can we be sure that our suppliers will incorporate our use?
	If you want to be sure that your suppliers incorporate your use, you may contact them to ask for confirmation that the registrant will based his assessment on the information in the use map. We would advise in this case to provide the reference of the relevant sector uses maps. This way, you increase the chance to get your use described in a harmonised way by your different suppliers in the ESs you will receive.
8	How does manufacturer/registrant conduct CSA for a solvent? Should they take information from all downstream users (e.g. AISE -cleaning with many variants of uses) or a generic ES produced by ESIG ESVOC (use in cleaning - industrial, professional)?
	The CSA needs to cover all the uses of the solvent. If the solvent is used for cleaning, and the cleaning operation is carried out under a variety of different conditions, more than one generic ES (GES) may be needed. In ECHA's view, the granularity of GESs and downstream sector use maps (e.g. AISE for cleaning products) should be aligned. A dialogue between upstream sector organisation and downstream sector organisation may be useful for that.
9	Use maps are prepared and used by formulators. They are not useful for article producers, which might work with high number of materials (covered by use maps from various sector organisations). Is there any support for article producers to deal with ES?
	Article producers are downstream (end) users, and therefore need to make sure they use the substances/mixtures safely. Explanation on how to deal with exposure scenarios are available in the guidance for downstream users http://echa.europa.eu/documents/10162/23036412/du_en.pdf and in the practical

	<p>guide 13 http://echa.europa.eu/documents/10162/13655/du_practical_guide_13_en.pdf.</p> <p>Use maps and article producers: formulators of mixtures meant to be incorporated into or onto articles (e.g. coatings, adhesives, plastic compounds/master-batches, inks, textile and paper finishing chemicals) are expected to cover the article service life in their use maps. If necessary, we recommend that sector organisations representing article producers co-operate with formulating sectors to develop the necessary use map elements for service life.</p>
10	<p>How are the types of uses defined? Can generic terms be used for example: Industrial Use?</p> <p>It is up to each sector to decide how to describe its typical uses. Nevertheless, the description should be informative enough for registrants, authorities and downstream uses companies receiving ESs. Therefore it is not advisable to define uses in a very generic manner.</p> <p>ECHA R12 guidance on use description describe the different elements forming the 'use description'. It include information on the sectors of end uses and the type of products covered. This information is structured as part of the use maps templates: http://echa.europa.eu/documents/10162/13632/information_requirements_r12_en.pdf</p>
11	<p>If the Product Category (PC) code in the extended SDS corresponds to our type of end use and final product, is it sufficient to confirm that our use is covered by our supplier? For example PC39 for use in cosmetic product.</p> <p>Verifying that a use is covered by the supplier requires more than the check of the PC code. The actual use and conditions of use described in the exposure scenario need to match with the activities on site. Please refer to the practical guide 13 for more information http://echa.europa.eu/documents/10162/13655/du_practical_guide_13_en.pdf</p>
12	<p>Are there ECHA guides available for use maps?</p> <p>Yes guidance is available.</p> <p>Templates and related guidance: https://echa.europa.eu/csr-es-roadmap/use-maps/templates-and-submission.</p> <p>Specific Chesar manual for downstream user sectors to support the creation of use map files in Chesar format: http://chesar.echa.europa.eu/documents/2326902/22862530/ChesarManSectorAssociations_en.pdf</p> <p>General information on use maps: http://echa.europa.eu/csr-es-roadmap/use-maps/concept</p>
13	<p>Is there guidance available on how formulators should compile the exposure scenario information of ingredient substances into a consolidated safe use information for a mixture?</p> <p>REACH does not prescribe how the exposure scenario information is to be included into the safety data sheet for a mixture. Exposure scenario information for substances becoming part of a mixture can be processed and forwarded in different ways.</p>

	<p>Formulators need to take into account the ES of all hazardous ingredients of the mixture. Scaling may be useful to adapt ES information to the actual concentration of the ingredient in the mixture but other types of scaling may be rather complex at mixture level.</p> <p>The information is to be consolidated into advice covering the whole mixture for the industrial or professional uses of the mixture.</p> <p>Two methods are being developed by industry: SUMI and LCID method. More information on these can be accessed via https://echa.europa.eu/communication-in-the-supply-chain-infographic</p>
<p>14</p>	<p>As a formulator we receive extended SDS with DNEL and PNEC. What do we have to do with these data? Why don't the suppliers restrict the data with what we really need?</p> <p>Communication of DNEL and PNEC is a legal requirement according to REACH Annex II. The information needs to be provided in Section 8.1.4 and can be used by downstream users who need to conduct their own assessment (DU CSR). DNELs can also be useful when carrying out a workplace risk assessments for occupational health and safety purpose.</p>