

Supply chain communication: how use maps help

Webinar: Getting meaningful exposure scenarios: how sector use maps help

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### In this presentation

- Supply chain communication under REACH
- Challenges in exposure scenarios
- Overcoming challenges with sector use maps

## **Supply chain communication under REACH**















# Supply chain communication: why is it needed?

#### Manufacturer



Knows substance properties

- Physico-chemical
- Toxicological
- Ecotoxicological

#### Downstream user





Knows how the substance is used

- Operational conditions
- Applied risk management measures
- Foreseen products
- Concentrations...

Substance properties + conditions of use = assessment of safe use



## Supply chain communication: a key feature in REACH

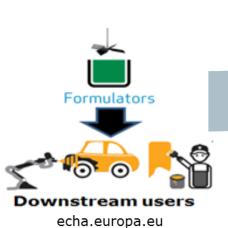
Access non-confidential data

Assess potential risks for all known uses



Further regulatory action

Information on uses of chemicals up the supply chain



Registrants

Helpful information on safe use down the supply chain



## Exposure scenarios: a new item introduced by REACH

- Generated by registrants
- Reflect result of exposure assessment carried out under REACH = conditions of safe use
- Available to authorities as part of chemical safety report in the registration dossier
- Communicated down the supply chain as annex to safety data sheets (SDSs)
- For environmental health and safety managers on-site and product safety managers



#### Safety data sheet

## Substance-specific information

- Properties and classification
- Regulatory information (e.g. registration number)
- Overview of registered Uses
- Format: 16 sections harmonised at global level (globally harmonised system (GHS))

#### **Exposure scenarios**

#### **Use-specific information**

- Operational conditions
- Risk management measures
- Exposure estimations (if relevant for recipient)
- Format: four sections format recommended (templates and examples on ECHA website)

Safety data sheet + exposure scenario = extended safety data sheet



#### Downstream user obligations

- Check that uses are covered in received exposure scenarios
- Implement appropriate risk management measures as provided by the suppliers
- Formulators: consolidate received information to derive safe use information for mixtures

## Challenges in exposure scenarios





### Experience so far - registrants

- Bi-lateral exchanges with multiple downstream users
- Unstructured information, not harmonised (multiple formats, multiple description for the same use)
- Key information missing (e.g. input to assessment tools)
- No specific information available
- Registrants may take decisions in areas where they do not have direct expertise
- Decisions might not be the same for all registrants



#### Experience so far – downstream users

- Exposure scenarios received difficult to use/process:
  - Extended safety data sheets are often 'too extended'
  - Lack of format for received exposure scenarios
  - Exposure scenario too generic or too unrealistic to be helpful
- Further work often required:
  - Contact suppliers to adapt exposure scenarios
  - Apply scaling
  - Carry out a downstream user chemical safety assessment



#### Potential consequence for business

- Customer dissatisfaction (wrong/unhelpful safety data sheets)
- Burdensome/costly process e.g.:
  - Maintaining and updating exposure scenarios for registrants and formulators
  - Carrying out own assessment for end-users
- Risk that authorities pick substance for further regulatory action for the "wrong reasons" (data in registration dossier does not reflect reality)

#### Solutions available to reduce these business risks

echa.europa.eu

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Overcoming challenges with sector use maps

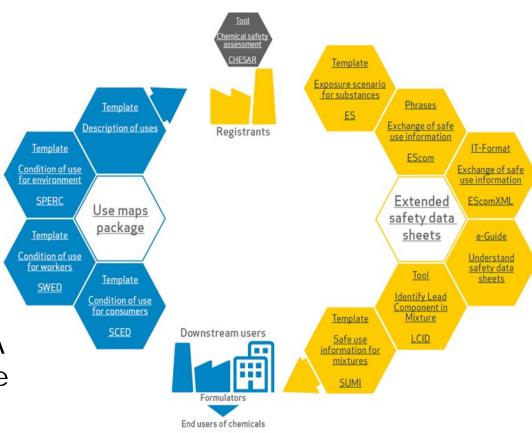






#### Working together on solutions

- CSR/ES Roadmap: joint action plan towards 2018
  - Suite of tools for improving communication in the supply chain
  - Key actors involved.
    See DUCC/Cefic/ECHA joint statement on use maps







#### Use map concept

A process and a format to facilitate communication of information up the supply chain

- FORMAT: harmonised templates for describing typical uses and conditions of uses in a sector
  - -> Same format for all

#### PROCESS:

- Use maps preferably developed by downstream user sectors in collaboration with their members and made available to registrants
- -> One use map per sector, covering the most typical uses
- -> One central repository for all sector use maps





# Use map process: downstream user sector organisations

- Map common uses among their membership and document in harmonised format
- Describe existing conditions of use so that they can be fed into registrant's exposure assessment for workers, consumers and environment
- Phrase the conditions so downstream users able to understand when they receive the information with the exposure scenarios
- Make their use map publicly available in the use maps library on ECHA's website





### Use map process: registrants

- Consult use maps library and select the uses relevant for they substances
- Upload the information package into their assessment
- Derive exposure estimate and risk characterisation:
  - Substance fits into existing conditions of use: document and communicate in exposure scenario
  - Control of risk cannot be demonstrated: refine assessment





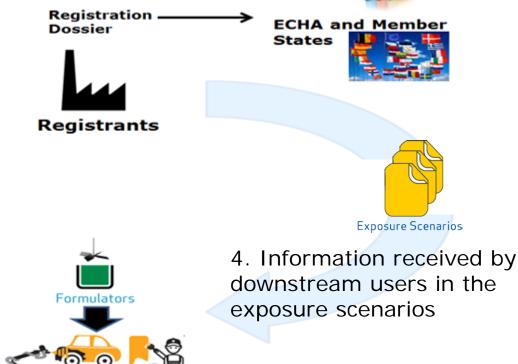
#### Use map process

2. Information used by registrants as input for chemical safety assessment

3. Information made available to authorities (support decision making) and to general public

1. **Realistic** information on uses and conditions of uses in sector use maps





**Public** 





#### Use map format

- One template for description of uses (use map format)
- Three templates to report inputs to chemical safety assessment for:
  - workers
  - consumers
  - environment
- <u>Templates</u> support the collection of input information for the most common exposure assessment tools
- <u>Template</u> content aligned with other IT tools (Chesar, IUCLID, ESCom xml); automatic transfer supported



#### Main benefits of use maps

- Effective way to collect representative information on uses
- Provides structured comprehensive information allowing registrants to carry out a chemical safety assessment in an efficient way
- Helps downstream users make sure their typical uses are covered in the registration dossier of a substance



### Main benefits of use maps

- Helps registrants prepare more realistic chemical safety assessments for their REACH registrations
  - More helpful for customers
  - More helpful for authorities
- Increases consistency across assessments
- Avoids unnecessary (one-to-one) supply chain communication

Use maps can help promote good practice and realistic advice on safe use



### Thank you

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