

ENES implementation plan 2018

April 2018

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1. INTRODUCTION

The ENES Work Programme to 2020 is a cross-stakeholder plan of actions.¹ The main lines of activity and the priorities are to:

- Determine the information needs of the different actors (content and form of information).
- Connect practices under REACH with practices under other legislation (OSH, environment, consumer safety).
- Develop and maintain the methods and tools to collect, process and communicate this information.
- Adapt the exposure assessment methods and tools to support the REACH safety assessment framework.
- Convince companies (and authorities) that it is worth the effort (demonstrate usefulness and feasibility).

This Implementation Plan translates the main action areas identified in that Work Programme into concrete activities for 2018. These activities form part of rolling programme to 2020 through which good practice examples, the illustration of methods applied in practice, guidance, and the adaptation and extension of tools to meet the needs of different user groups in the supply chain will become available.

It is also crucial to pay attention to the communication of the developed solutions, tools, and support material to **promote** their use. If the ENES outputs are not known or not used in the supply chain, the common objective of ensuring that actual risks are managed will not be achieved.

2. ACTION DESCRIPTIONS

Fifteen of the total 24 ENES Work Programme's actions are actively underway. A description of each of these actions is provided in the following pages. The descriptions follow a template that sets out:

- **Participants:** The lead organisation, the responsible person and the participants for the action.
- **Motivation:** A description of why the action is necessary and the problem(s)/issue(s) that the action will address.
- **Objectives:** A description of the objective(s) that will have been reached by year end.
- **Overview on expected activities:** A description of the activities e.g. workshop, survey, document, written in as much detail as possible for the activity in question, to reach the objective(s).

Readers who want to learn more about an action, or indeed contribute to the action's outputs, are invited to contact the responsible person given.

The ENES Coordination Group will assess achievement at the end of 2018 and steer the work accordingly for the following year.

The figure beneath illustrates (by colour) the six areas of action and the corresponding actors described in this Implementation Plan. Action descriptions can be found in the next section grouped beneath the same coloured headings.

¹ ENES Work Programme to 2020, https://echa.europa.eu/documents/10162/23915781/enes_work_programme_to_2020_en.pdf/7862a4b5-0e5b-e4ea-c47c-6caf72cee847

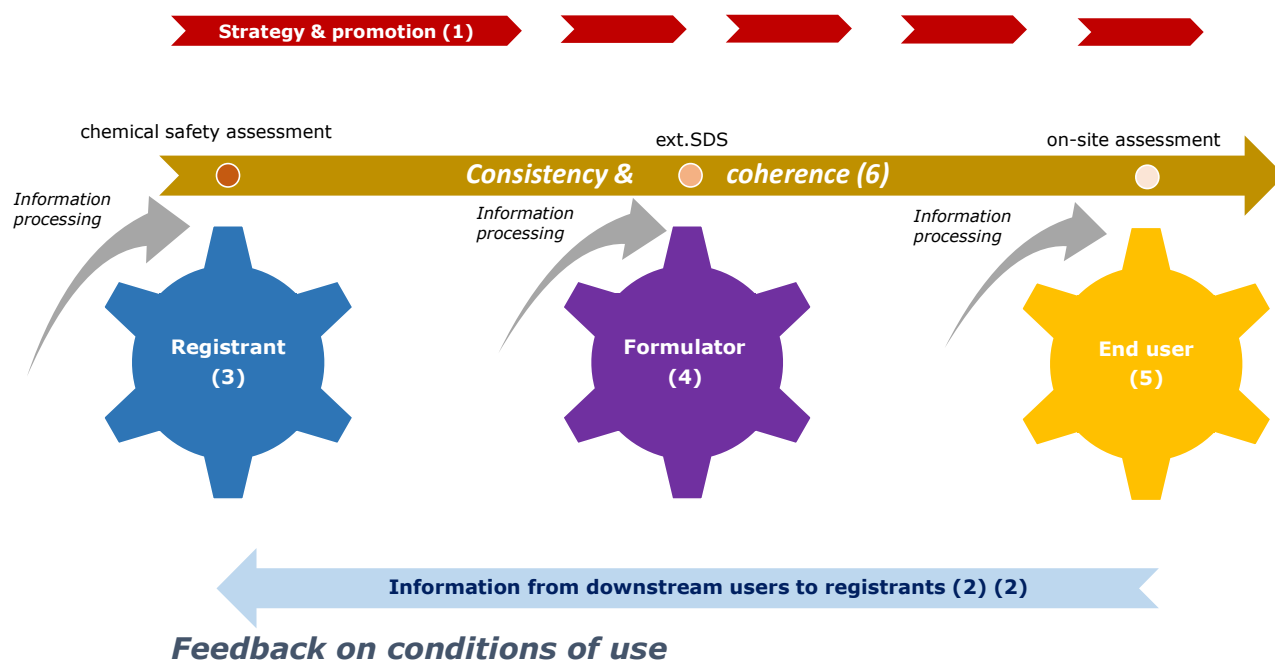


Figure 1: Areas for action in the supply chain communication system.

2.1 Catalogue of action descriptions

All 24 actions in the ENES Work Programme to 2020 are listed beneath. Descriptions for 15 of them are detailed on the page indicated.

For those actions that are greyed out, no description is provided. Descriptions are either in preparation or are not scheduled to commence until 2019, as they require the outputs of other actions. For some, resources or an available lead organisation are required before the task can be initiated.

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² This action title differs from the title given in the ENES Work Programme to 2020 - *Promote cooperation among registrants of the same substance to increase the consistency among the safe-use information communicated down the chain by each of them* – in order to describe the first step of a 3 year action, which aims to find solutions.

³ No action description. Sectors will develop and publish use maps overtime. Contact points for available use maps can be found in the Use maps library at <https://echa.europa.eu/csr-es-roadmap/use-maps/concept>

	based on exposure scenarios coming down the supply chain (LCID).	
4.3	Explore existing approaches for generating safe use information for mixtures for use in mixtures.	-
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6.1	Analyse current communication practice on risk and risk management through the supply chain (Research project REACH2SDS).	28

ENES Action 1.4

Analyse the consistency of safe-use information for the same substance across the different registrants.

Lead: Fecc (contact: Irantzu Garmendia, iga@FECC.org).

Participants: Fecc, Univar, Brenntag Holding, Brenntag Nordic, Caldic Benelux.

DUCC, Cefic.

1. Motivation

To make sure that the relevant information of substances is provided in the supply chain and guarantee the safe use of them, efficient communication is paramount.

Title IV of REACH sets the legal requirements for the transfer of the information in the supply chain. However, how these requirements can be effectively implemented is still a challenge for industry.

Distributors frequently observe significant inconsistencies in the information on safe use they receive for the same substance from different suppliers. This creates extra burdens on distributors (and also on formulators) being obliged to forward this information to next level in the supply chain, and thus a solution is sought.

2. Objectives for 2018

The objective for 2018 is to identify the nature and the extent of inconsistencies on the safe use information coming from different joint registrants for the same substance.

3. Overview on expected activities

In order to achieve the above mentioned objectives the following activities should be undertaken in 2018:

1. Description of how distributors handle and consolidate information from different suppliers of the same substance.
2. Identify main challenges and inconsistencies that create obstacles for the consolidation.
3. Carry out a representative analysis on these inconsistencies.

This analysis will be the basis to start the identification of root causes and potential solutions in 2019.

4. Outputs and anticipated timelines

Output/Deliverable	Responsible	Timeline
Report on the consolidation process applied at distributor's level.	All	End May
Face to face meeting.	All	June
Report on the most frequent/most challenging inconsistencies occurring across suppliers.	All	Mid October
Final report of the action and conclusions.	All	End 2018

ENES Action 2.2

Support to sectors developing/updating use maps

1. Participants

Lead: ECHA (contact: Laure-Anne.CARTONDETOURNAI@echa.europa.eu)

Participants⁴: AISE, ATIEL, Cefic, CEPE, Concawe, Cosmetics Europe, ECHA, ECMA, ECPA, EFCC, ESIG, EuPC/EuMBC, FEICA, Fertilizers Europe, I&P.

2. Motivation

In the past year a network of use maps developers has been set in place to facilitate exchanges among use maps developers and with ECHA on technical issues, to agree and disseminate good practice between sectors, to identify further developments needs and to discuss ways to promote effective uptake of the use maps by registrants.

The benefits of the Network has been widely recognised by its members and it is suggested to continue the activity in the coming year.

Indeed, a number of sectors are currently still developing elements of their use map package. ECHA can continue providing ad-hoc support to sectors and will maintain its technical review prior to publication of the use maps in the library. The aim is to ensure proper application of the use map concept and good utilisation of the templates/Chesar tool by all.

A first piloting phase of the use map undertaken in 2017 had highlighted some areas for improvements. It is expected that more feedback from users will become available in the coming months. The network of use maps developers provides the right forum to discuss on the feedback received and consider possible follow up actions.

The network of use-map developers can also serve as a platform to/for exchange on the ways to achieve the buy in of use maps by registrants (promotion activities, specific projects by supply chains).

3. Objectives for 2018

The main objectives for 2018 are listed below. Details on the related activities are provided in section 4.

- Objective 1: Support industry sector associations developing use maps
- Objective 2: Facilitate cross-sectors exchanges
- Objective 3: Streamline the sectors input to ESCom
- Objective 4: Collect and streamline the sectors input to Chesar

4. Overview on expected activities

1. Support sectors developing use maps:

- Provide ad-hoc support to sectors developing/updating uses maps via bilateral exchanges with ECHA;
- Carry out a technical review of the use maps files prior to publication on the use maps library to ensure proper application of the use map concept and consistency in the way the templates have been used;
- Develop a good practice manual for sectors publishing use maps together with advice on common issues.

2. Facilitate cross-sector exchanges

- Contribute to the further piloting of the use maps implementation (link to ENES actions

⁴ New sectors are welcome to join at any point.

- 2.4/4.1). Collect topics that could be covered in further testing such as:
- How to link uses to individual substances
 - How to support the use of Tier 2 assessments via use maps (SWEDs in particular)
 - How should registrants use the typical concentration of functional components (substances) in a mixture
 - Improvement of rules for the short titles
 - How to use use codes
- Exchange on current practice to look for possibilities for harmonisation/streamlining:
 - Overlaps of use maps between sectors
 - Pro and cons of the approaches taken by each sector for describing uses
 - Exchange on possible modifications of the use map package templates (e.g. considering input for ENES actions 2.3/2.4/3.2/4.2), agree on appropriate timing for introducing changes when needed (2018 and/or beyond), and coordinate with other correlated ENES tools (input to ENES action 2.6);
 - Exchange on use maps promotion activities. Agree on possible modifications of the Use maps library (input to ENES action 2.5).

3. Streamline the sectors input to ECom

- Facilitate exchanges between the downstream users sectors and the ECom task force to increase the common understanding on the role of standard phrases and ECom xml. If deemed relevant, support the submission of a consolidated request for standard phrases from sectors to ECom.

4. Collect and streamline the sectors input to Chesar

- Review the standard phrases associated to built-in-conditions of use in Chesar and submit a proposal to ECom (links with ENES actions 2.3/3.2);
- Identify /confirm the user requirements for Chesar 3.4 in relation to use maps (input to ENES action 3.1).

Deliverable	Responsible	Timeline
Workshop with use maps developers	ECHA/Sectors	Q2/Q3-2018 Q4-2018 (possibly)
Good practice manual for sectors developing use maps ⁵	ECHA	Q2/Q3-2018
Requirements for phrases associated to built-in conditions of use in Chesar (for SCED, SWED, SPERCs)	ECHA/Sectors	Q4-2018
Review report from ECHA to each individual sector on their use map prior to publication	ECHA	Ad hoc
Input to ENES12	ECHA/Sectors	Q4-2018

⁵ To be seen whether developed as a standalone document or integrated to the Chesar manual for sector associations.

ENES Action 2.3

Set up review process on the use maps element(s): SPERC revision

1. Participants

Lead: Eurometaux (contact: Lorenzo Zullo (zullo@eurometaux.be); Frederik Verdonck (frederik.verdonck@arche-consulting.be)

Participants:

SPERCs Task Force composed by representatives from the following organisations: AISE, ATIEL, Cefic, CEPE, Cosmetics Europe, ECPA, EFCC, ESIG, ETRMA, Eurometaux, FEICA, Fertilizers Europe.

2. Motivation

SPERCs have been developed by different industry sectors. A lot of work has been done during the past years, also in cooperation with EU institutions and Member State authorities, to define common approaches and formats (i.e. Factsheets and Background Document); individual industry sectors are in the process of generating/updating factsheets and background documents accordingly (ongoing activity).

The establishment of a review mechanism was considered to be needed and was included in the ENES 2018 – 2020 work programme: internal review (2018) and third party review (2019 – 2020). This would increase quality, as well as buy-in by authorities and registrants.

In preparation to the review, in order to establish common quality standards, it was agreed to define a set of Quality Criteria to help both industry and external reviewers to assess the quality of the SPERCs and to help identifying whether/where further improvement is needed.

3. Objectives for 2018

- Finalisation of the Quality Criteria and use by industry for internal review.

4. Overview on expected activities

- *Jan/Febr 2018: Establishment of an "extended" SPERCs Task Force to involve in the discussion ECHA and Member States' representatives*
- *January 2018: Circulation of the draft Quality Criteria*
- *February 2018: Collection of comments from ECHA/MSs (1st round)*
- *March 2018: Circulation of the revised draft Quality Criteria*
- *April 2018: Collection of comments from ECHA/Member States (2nd round)*
- *May-June 2018: Meeting between ECHA and SPERCs Task Force with the objective to reach a common understanding on the role of SPERCs in passing information to be communicated along the supply chain.*
- *Q3 2018: Finalisation of the Quality Criteria*
- *Q3- Q4 2018: Use of the quality criteria by industry sectors to assess the quality of the SPERC.*

Deliverable	Responsible	Timeline
Quality Criteria	SPERCs Task Force	Q3 2018
Internal review	Industry	As soon as the quality criteria are finalised (*)

(*) The beginning of the internal review process might vary from sector to sector depending on the status of development of the respective SPERCs documentation.

ENES Action 2.4

Pilot trial for utilising use map information in the registrant's chemical safety assessment and communicating exposure scenarios down the supply chain.

1. Participants

Lead: Cefic (contact: Alejandro Garabatos, AGA@cefic.be)

Participants: Cefic, FEICA, EFCC, ECHA, ESIG, Concawe.⁶

2. Motivation

REACH placed the responsibility on the safe use of chemicals on industry and introduced a new framework for the assessment of chemicals and their uses. The information from this assessment is summarised in the Chemical Safety Report (CSR), and a key component of the CSR are the exposure scenarios (ES) included in the extended safety data sheets (eSDS). This information is essential to many actors in the chemical supply chain.

The CSR/ES Roadmap recognizes that the mechanisms for producing the exposure scenario as part of the CSR and the communication of the relevant information on safe use up and down the supply chain have to be improved, fully understood and adequately implemented.

It is crucial to increase awareness and acceptance of these tools (i.e. harmonised templates for communication up/downstream such as Use Map packages, exposure scenario and Safe Use of Mixtures Information (SUMIs) respectively, and IT-tools such as Chesar and ESCom), but also to demonstrate that the concept works in practice and that in combination they provide added value across the supply chain, as demonstrated in previous phase of piloting.

3. Objectives for 2018

The main objectives for 2018 are focused on exemplifying the practicality of the use-map machinery tools, as well as its helpfulness in improving the supply chain communication. To that aim, it is proposed to extend the pilot:

- To cover more complex situations (e.g. including environmental assessments and work towards linking it to higher tier assessments or other assessments tools beyond ECETOC TRA).
- To include the "GES" developed by the solvent sector (ESIG) as a source of information on uses for registrants, and compare the results with applying DU sectors' use maps.
- To cover additional downstream sectors use maps.
- To explore further how the recipient of the exposure scenario can process them (also linked to the developed methodologies for generating safe use information of mixtures (SUMI selection method – SUMI, and Lead Component Identification Method – LCID). (*Connection with Actions 4.1 and 4.2*).

The outcome of the pilot will serve as input to develop a supporting guidance to assist both,

- o **use maps' developers**, to create more consistency in the description of uses and conditions of use (connection Action 2.2, development of support material).
- o **registrants**, to help them in the correct application of the use maps approach and implementation in their dossiers (connection Action 2.2, development of support material)

⁶ Participants reflect the commitments from sectors at the time of publication and may be adapted once the pilot is concretely set up.

4. Overview of expected activities

Deliverable	Responsible	Timeline
Pilot project plan – Phase II (with objective, participants, actions steps and expected outcome)	Cefic’s pilot project members	Q2 2018 (June)
Outcome of pilot in Q4: Report including the list of observations from the pilot. This list will be shared with the use map developers’ network (to serve as basis to develop further guidance or to identify need for changes in existing tools).	Cefic’s pilot project members	Q4 2018

ENES Action 2.5

Maintain and further develop the Use maps library

1. Participants

Lead: ECHA (contact: Laure-Anne.CARTONDETOURNAI@echa.europa.eu)

Participants: ECHA, collaboration with the use maps developers' network (ENES Action 2.2)

2. Motivation

Under REACH downstream users are invited to make their uses known to registrants and registrants need to assess the uses made known to them.

The communication of information from downstream users to registrants has shown to be challenging, among other because of the multiplicity of actors.

The use map library has been developed as a solution to streamline the communication. It consists of one central repository where DU sectors are invited to publish their use maps information so that it becomes easily accessible to registrants.

The use maps library is hosted on ECHA's website and is already widely consulted (>12 000 files downloaded between October 2016 and November 2017). However more can be done to increase its use by the different actors (registrants and sectors).

3. Objectives for 2018

The main objectives for 2018 are the following:

1. Increase awareness among registrants on the use-maps library; Monitor the level of consultation;
2. Improve transparency towards registrants on new information made available by sectors and on further developments planned;
3. Encourage feedback on use maps (feedback from registrants, feedback from DU companies).

4. Overview on expected activities

- **Increase awareness on use maps library via**
 - o Participation at events targeted to registrants (Seminar, Webinar, Conferences);
 - o Increased referencing to the Use maps library from other websites (e.g. Cefic, DU Sectors, national Helpdesk, Chemical Watch);
 - o Publication of news, articles, ...
- **Monitor the level of consultation of the use maps library via**
 - o Bi-annual extraction of number of use maps files downloaded from the library.
- **Increase transparency towards registrants on new information made available by sectors and on further developments planned:**
 - o Inform registrants about new publication via snippets in the ECHA Weekly, posts in LinkedIn and Tweeter, notifications via Chesar, ...;
 - o Actively encourage DU sectors in indicating their further development plans and associated indicative timeline in their section of the use maps library;
 - o Explore what could be done in the perspective of a more global strategy for regular dossier updates by registrants.
- **Encourage feedback on use maps:**

- Organise exchanges within the use-maps developers' network on possible ways to collect feedback on use-maps, including on possibility to develop a specific functionality for that on the Use-maps library website.

Deliverable	Responsible	Timeline
Updates of the use maps library based on improvements identified	ECHA	Q2 2018 and Q4 2018
Report on the use maps library consultation level (statistics on number of files downloaded)	ECHA	Q2 2018 and Q4 2018

ENES Action 2.6

Maintain and adapt the use-maps machinery as a whole.

1. Participants

Co-Leads: ECHA (contact: Laure-Anne.CARTONDETOURNAI@echa.europa.eu), Eurometaux (frederik.verdonck@arche-consulting.be), Concawe (marilena.trantallidi@concawe.eu), Cefic.

Participants: No specific working group created under this action. Input via the network of use map developers (Action 2.2), the Industry SpERC working group (Action 2.3) and the 'workers' working group (Action 3.2). Use maps developers network to serve as platform to exchange on the proposal for changes. Co-leads responsible for the actual implementation of the agreed changes in the single tools.

2. Motivation

The ENES tools need to be maintained and adapted based on the learnings (e.g. via piloting activities and other experience in various ENES action areas) to ensure that they support in the more efficient way the exposure assessment by registrants and the communication of safe use information in the supply chain.

The single tools - together forming the use-map machinery - are strongly interconnected to each other, thus modifications/development of one tool has implications for the others. The current action therefore provides a mechanism to collect needs for changes and discuss solutions to ensure consistent implementation across tools (e.g. Chesar and use maps templates, Chesar and ECom xml, standard phrases etc). The responsible person for each tool will ensure implementation of the agreed changes in the single tools or raise difficulties with regard to his tool so that alternative solutions can be found.

3. Objectives for 2018

The action has the three following objectives:

- The use maps templates and related tools are fully aligned (link to the update/releases of Chesar, ECom xml, ECom phrase catalogue).
- The SPERC/SWED template(s) better support the reporting of conditions of use (e.g. beyond TRA inputs for the SWEDs (to be developed in collaboration with Action 3.2));
- The key information to be communicated (interface to ECom) e.g. via SWEDs and SPERCs⁷ is clearly identified (interface with ENES Actions 3.2 and 2.3).

4. Overview on expected activities

The lead organisations will collect update/development requirements from the various actions under the ENES programme. This will result in an overview of required updates, to be collectively agreed across the work programme. The lead organisation will ensure the implementation of the agreed changes in the single tools or raise difficulties so that alternative solutions can be found jointly.

The lead organisations will represent the ENES tools (and ENES actions) as follow:

- ECHA: Chesar, the use maps and the SWED templates (ENES Actions 2.2, 3.1 and 3.2)
- Eurometaux: the SPERC template (ENES Action 2.3: industry SPERCs Task Force)
- Concawe: the SCED template

⁷ Note: no equivalent objective for SCEDs in 2018 (to be seen in 2019 depending on the outcome of the Action 4.5)

- Cefic: ECom standard phrase catalogue and ECom xml (ENES Action 3.3b)

The lead organisations will be represented at the meetings of the use maps developers network so that each of the use map package templates and IT tool is represented.

Examples of already identified alignment needs between tools:

- Alignment of the use map template generated by Chesar and default format published in the library (e.g. add rigorous containment field).
- Update SWED template (e.g. adaptation of the LEV values so that it fits the picklist values in TRA, adaptation of the default standard phrases associated to certain conditions of use)
- Update SCED template (if needed) based on agreed common decision on how to report frequency of uses.

Deliverables	Timelines
Compilation of proposed updates/modifications per tool	Q2-2018 Q4-2018
Agreed working plan for implementation of the changes in the different tools	Q3-2018 Q1-2019

ENES Action 3.1

Adapt Chesar to use map experience

1. Participants

Lead: ECHA (contact: helene.magaud@echa.europa.eu)

Participants: The work is ultimately carried out by ECHA Chesar team. Chesar users are regularly consulted including via the Cefic Chesar task force. Use maps developers' network to serve as platform to discuss the final proposal for changes.

2. Motivation

Chesar is now used more and more by registrant for preparing their chemical safety assessment (around 50% of the CSR submitted). Also more sectors are making their information available to registrants in Chesar format.

In order to facilitate the utilisation of use-maps as a starting point for the assessment it is important to ensure that the tool well supports the needs of the use map developers as well as the needs of the assessors utilising the use maps. In addition, the exposure scenario generated by Chesar should fit the needs of the recipients (DUs).

3. Objectives for 2018

Identify how to adapt Chesar to better support the needs of (i) use maps' developers, (ii) registrants using use maps for their assessment and (iii) formulators receiving exposure scenarios from registrants made with Chesar. Implement those needs in Chesar 3.4 or prepare for implementation in Chesar 3.5.

4. Overview on expected activities

Collect feedback from the various ENES Actions: via the network of use map developers (Action 2.2), the Industry SPERCs Task Force (Action 2.3), the 'workers' working group (Action 3.2), the requirements for the exposure scenario for communication (Actions 3.3) as well as from pilots when relevant (Actions 2.4, 4.1 and 4.2).

Make proposals on how to modify the tool and implement when appropriate for Chesar 3.4 planned to be released in Q4 2018. Collect additional needs for Chesar 3.5.

Update the Chesar manual for sector associations to develop their use maps.

Deliverable	Responsible	Timeline
Update Chesar manual for sector associations to develop their use maps	ECHA	Q2 2018
Chesar 3.4	ECHA	Q4 2018
User requirements for Chesar 3.5	ECHA	2019

ENES Action 3.2

Consolidate the different workers exposure tools into a common framework

1. Participants

Lead: ECHA (contact: Celia.TANARRO@echa.europa.eu)

Participants: BAuA/EMKG, DUCC, EBRC/Mease, ECETOC, Eurometaux, Fecc, RAC members, RIVM, Stoffenmanager, SECO/TREXMO, TNO /ART, Cefic.

2. Motivation

This action relates to workers' exposure assessment in the context of REACH processes where industry is required to i) prescribe (and communicate) condition of use suitable for controlling risks at workplaces and ii) to provide exposure estimates for such conditions (registration and authorisation).

Experience since the first REACH registration deadline shows that the current exposure assessment practice under REACH is facing a number of significant difficulties:

- For worker exposure assessment a variety of tools and methods are available, but there is a lack of common understanding/concept which method/tool is most suitable for which type of substance, exposure situation or assessment purpose. Also, many of the input parameters for the different tools are largely addressing the same core exposure determinants (conditions of use), but expressing them in different words and granularity. This creates significant challenges for an efficient communication on the conditions of safe use up and down the supply chain, in particular if different tools are used for the dermal route and the inhalation route within one assessment.
- Member state authorities have challenged the reliability and robustness of the exposure estimation tool (in general or for certain scenarios) having been used by industry in about 90% of all registrations (ECETOC TRA). This is partly based on a couple of scientific papers having been published over the past four years.

The action aims to start a process towards i) more common understanding among authorities, industry and tool owners on what the exposure assessment under REACH is meant to deliver, ii) a common framework/platform under which the various tools and methods could work together in a consistent and efficient manner, and iii) improving the available methods and tools themselves.

3. Objectives for 2018

Task 1.1: Comparing the scope of applicability of the tools

The objective for the work in 2018 is to clearly identify for the tools covered by the action (ECETOC TRA, MEASE, ART, Stoffenmanager, EMKG Expo tool, BEAT and RiskofDerm⁸):

- What is their applicability domain in terms of substance properties.
- What is their capacity to cover/differentiate certain conditions of use (CoU).
- How appropriate are they to assess exposure in a generic site (for top down assessment under REACH) or for assessment in specific sites (requiring specific knowledge to determine the input values for the tool) for which default assumptions may be difficult to set.

Task 1.2: Identification of similar CoUs in the different tools

Providing a harmonised core set of conditions of use which can be used as input in the various tools. This will also include a harmonised way of communicating those conditions of use. This set will then be integrated into the SWED template and Chesar (see also action 2.6). To develop such a set, a mapping of the conditions of use across the various tools will be carried out.

Task 2: Follow up on publications on tool reliability

⁸ No representative for BEAT or RiskofDerm has volunteered to participate in this action at the moment.

Reach a common understanding on the reliability of the various tools (taking into account the activity, conditions of use, substance properties).

4. Overview on expected activities

Task 1.1: Comparing the scope of applicability of the tools

- Prepare a template including the basic description of the tools and the applicability domain in terms of substance properties and CoU covered.
- Completion of the template pre-filled (by ECHA) by tool owners and revision by all participants
- Initial analysis of the results (gaps, overlaps etc.). Identification of needs and planning for work in 2019

Task 1.2: Identification of similar CoUs in the different tools

5. Proposal for mapping activities/conditions of use between tools based on the mapping made for TREXMO development
6. Review by all tool owners
7. Proposal for a common set of conditions of use (using Chesar format)
8. Workshop with the group to discuss the proposal

Task 2: Follow up on publications on tool reliability

- Identification of relevant publications
- Agree on which results indicate that the tool is not reliable for a certain situation (different publications assess the results differently)
- Development of a common template to report the conclusions from the analysis
- Testing of the template with a few publications
- Identify situations where the tool may lead to significantly wrong assessments
- Draw conclusions in terms of situations where some tools may lead to a high risk of wrong assessment. Identification of needs and plan workplan for 2019 if relevant.

Deliverable	Timeline
Task 1.1: Scope of applicability	
Template (incl. basic description of the tool) (1 st Draft)	End of March
Revision / completion by tool owners	(Webex April)
Comments on template by all	May (finalisation)
Workshop with all participants	June/ September
Final description and conclusions	End 2018
Task 1.2: Identification of similar CoUs	
Mapping of the CoU (1st draft)	End of March
Revision by tools owners	April/ May
Initial draft on harmonised set of conditions of use (including a version in Chesar format)	June/ September
Workshop with all participants	June/ September
Final set of CoU in Chesar format and input to SWED template	Q4
Task 2: Follow up on publications on tool reliability	
Identification of relevant publications	End of March
Template development	End of March
Development of criteria for non-reliability	
Testing of the template	April/May
Consultation with all participants	June
Identify situations where the tool may lead to significantly wrong assessments	September

ENES Action 3.3b

Maintain and further develop the ECom package

1. Participants

Lead: Cefic (Dow), Dook Noij, dook.noij@dow.com

Participants: ECom Standard Phrases Working Group (Cefic/DUCC), ECom IT providers Working Group.

2. Motivation

The use of standard phrases for communicating ES information to downstream users as well as mechanism for electronic ES data exchange will contribute to a more effective and efficient communication within the chemical supply chain. For more background, refer to the ENES Work Programme to 2020, chapter 2.

3. Objectives for 2018

- Release of two updated versions (version 4.0 (April) and 4.1 (November)) of the ECom Standard Phrase Catalogue. The version 4.1 will contain modified and additional standard phrases covering:
 - o Use map, SWED and SCED information, as far as relevant for the DU and as far as available and agreed on with ECom by sector organisations.
 - o Information for working outside the boundaries of the ES (section 4 information), provided agreement has been reached on tools, approach and scope.
 - o Information on conditions used in the most common exposure assessment tools that are relevant to communicate to the DU.
- Intensify the cooperation with sector organisations and DUCC to ensure inclusion of relevant use map, SWED and SCED information in the ECom Catalogue.
- Release of a version 2.1 of ECom XML that enables the transfer of information on additional elements such as scope phrases, use maps, SWEDs and SCEDs.
- Developing guidance on how to use the ECom Standard Phrase Catalogue.

4. Overview on expected activities

Deliverable	Responsible	Timeline
Updated ECom Standard Phrase Catalogue version 4.0	ECom Standard Phrase WG	April 2018
Updated ECom Standard Phrase Catalogue version 4.1	ECom Standard Phrase WG	November 2018
Modified ECom XML version 2.1	ECom IT provider WG	November 2018
Guidance document on use of the ECom Catalogue	ECom Standard Phrases WG	November 2018

ENES Action 3.4

Materials' flow analysis for metals supporting REACH assessment.

1. Participants

Lead: Eurometaux (contact: Violaine Verougstraete, verougstraete@eurometaux.be)

Participants: Exposure Scenarios Taskforce Eurometaux including metals consortia.

2. Motivation

Materials' flow analysis (mapping the uses of a substance along the supply chain, associated with a quantitative estimate) is an important element in the REACH registration dossier. The goal of such an analysis is to show where the "substance comes from" and "how it is used on the EU market" and/or exported, allocating percentage estimations (and tonnages when available) at the different steps of the lifecycle (industrial, professional, consumer uses, potential service life).

It provides important information both for registrants in order to i) assess properly the possible environmental risks posed by the substances they market and the ES that can be expected and ii) for authorities to identify efficiently through the common screening process those substances that deserve closer scrutiny for further regulatory action at European level (understand the extent of a use or a group of uses). Otherwise inappropriate regulatory action may be suggested and hence a lot of time is possibly wasted by regulators and industry alike.

The (European) metals' sector has gained valuable experience in practical methods for materials' flow analysis in its supply chains when preparing REACH's regulatory risk management processes.

This action will exemplify good/best practice for materials' flow analysis in the metals' sector.

This action will deliver a template to report the information in the registration dossier. In doing so, it will also explore the best link with IUCLID and use maps.

The approach, the draft template for data collection and the learnings will be shared with the other sectors working under the ENES umbrella.

3. Objectives for 2018

- Further develop how information on materials' flow analysis can support the registrant's chemical safety assessment (interface with sector use maps) and risk management activities, including authorities' processes for prioritisation of substances that matter. Exemplify for metals' cases and share learnings with others sectors involved in ENES.
- Understand better how information per use can be specified in sector use maps.

4. Overview on expected activities

1. **Metals industry** to further develop template by evaluating recent and best case examples on materials' flow analysis and the link to Risk Management Measures/Options.
2. Prepare explanatory note with clear recommendations on data collection-data reporting (2018).
3. Present template + worked out examples to **ENES** (2019).
4. Finalise template and make it available on relevant websites/webpages (2019-2020).

Deliverable	Responsible	Timeline
Review of materials' flow analysis case studies in metals' sector.	Eurometaux	March-September 2018
Template + explanatory note on good practice materials' flow data collection.	Eurometaux	December 2018

ENES Action 4.2

Exemplify the available methods to generate safe-use information for mixtures based on exposure scenarios coming down the supply chain (LCID).

1. Participants

Lead: Cefic/VCI (contact: Angelika Hanschmidt, hanschmidt@vci.de)

Participants: Joint VCI/Cefic Mixtures Task Force (involving volunteers from other associations), ECHA

2. Motivation

In February 2016 the Cefic/VCI Mixtures Task Force published the "Practical Guide on Safe Use Information for Mixtures under REACH, The Lead Component Identification (LCID) Methodology" In August 2016 a supplementary Excel based tool, embedded with LCID calculations, was published. The application of the LCID methodology has been explained in publications (e.g. ECHA newsletter, ChemicalWatch) and during workshops (Brussels May 2016, Frankfurt February 2017).

These deliverables were provided under the auspices of the Exchange Network on Exposure Scenarios (ENES) tasked with implementing actions identified under the joint CSR/ES Roadmap of authorities and industry. The development of the LCID methodology was a response to Action 4.4A of the Roadmap on mixtures: Support to formulators; Converting substance exposure scenarios into advice on the safe use of a mixture; Top-down approach.

Under the ENES Work Programme (2018-2020), as a follow-up to the CSR/ES Roadmap, contributors were asked to focus on raising awareness of the systems and programs they developed as part of the Roadmap. To this end, the Mixtures Task Force intends to provide explanation and examples how the results from the application of the LCID methodology might be communicated in a safety data sheet of a mixture.

As set forth under REACH, suppliers of hazardous mixtures must comply with safety data sheet requirements according to REACH Article 31. In doing so, they must include relevant information from exposure scenarios of the component safety data sheets when compiling mixture safety data sheets for their identified downstream users.

3. Objectives

Elaboration of examples that document how the output of the LCID methodology's application might be communicated via the safety data sheet of a mixture – thereby covering different options (incorporation of LCID output in the chapters of the SDS or in an annex).

4. Overview on expected activities

In 2018, the following activities will take place:

- Work out for a range of different mixture types examples on how the outcome of the LCID methodology could be communicated - ideally cases for which the LCID methodology has already been applied.
- Check the consistency of examples with relevant, current guidance documents, e.g. ECHA's guidance on use description (R.12) or recommendations from other relevant CSR/ES Roadmap and ENES deliverables.
- Work out best practices and/or rationales for options for companies to communicate the LCID output when drafting the safety data sheet(s) for their mixtures.

Deliverable	Responsible	Timeline
Elaboration of draft examples.	Task Force	Q1-Q4 2018
Final report.	Task Force	Q2 2019

ENES Action 4.5

Explore methods for formulators to check the safety of their consumer products against exposure scenarios received.

1. Participants

Lead: ECHA (contact: andreas.ahrens@echa.europa.eu)

Participants: sector organisations and single formulators involved via workshop, survey and testing of proposed solutions.

2. Motivation

So far the work on improving the communication on conditions of safe use in the supply has mainly concentrated on the occupational aspects, i.e. the traditional content of safety data sheets. Little is known on the extent to which the exposure scenarios generated and communicated under REACH sufficiently support formulators of consumer products in determining whether their products are safe to use for consumers. However from the exposure assessment tools in use at registrants' level it is obvious that the input parameters for the exposure estimate are not yet well converted into exposure scenarios for communication.

The action aims to better understand the information needs of formulators of consumer products, and from there to identify the potential scope for a future work process to improve the REACH chemical safety assessment for consumer uses of mixtures. Improvements may be needed regarding i) the consumer exposure tools used by registrants, ii) the communication of conditions of safe use down the supply chain or iii) communication of better information on condition of consumer uses up the supply chain.

3. Objectives for 2018

ECHA took the initiative to launch a consultant study (by RIVM/RPA) in December 2017 which is expected to deliver its results in November 2018. In addition ECHA will carry out some analytical work in the REACH registration data base. The objectives for 2018 are the following:

- Understand the information needs of formulators of consumer mixtures for them to ensure that their products are safe to use.
- Problem-Analysis with regard to the foreseen REACH mechanisms.
- Identify options for solutions tested with formulators.
- Get better understanding (based on REACH registration database) on:
 - The hazard profiles of the substances registered for consumer uses (and the corresponding assessment needs).
 - On tools used by registrants to carry out quantitative exposure assessment for consumer uses.

4. Overview on expected activities

- Survey among formulators on current practice of product safety assessment, their information needs and the experience with REACH so far (carried out by consultant).
- Stakeholder workshop on 9 March.
- Work out a problem analysis and possible solutions.
- Test the solutions with a number of formulators.
- Work out solution proposal and define scope of follow up work (if relevant).

Deliverable	Responsible	Timeline 2018
Survey report	RIVM/RPA	April
Workshop and workshop report	RIVM/RPA	April
Project report by consultants	RIVM/RPA	November
Proposal for follow up activity	ECHA	December

ENES Action 5.1

Set up monitoring system for progress at the bottom of supply chain.

1. Participants

Lead: ECHA (contact: Petteri Mäkelä, petteri.makela@echa.europa.eu)

Participants: ECHA and ENES Coordination Group, UEAPME, FIEC.

2. Motivation

The objective of the [ENES programme](#) is to improve communication in the supply chain so that the use of chemicals becomes increasingly safe in countries that have implemented REACH. The ENES Coordination Group regularly reviews state of the programme and decides on its reorientation. To support its work, the Group has identified a need for a monitoring system that will facilitate the assessment of how the actions in the work programme⁹ are delivering towards the end user related ENES objectives.

3. Objectives for 2018

The objective of this action is to set up a monitoring system¹⁰ and to identify the baseline data that could be easily collected. The information should help the understanding of how exposure scenarios and their communication with the safety data sheet are influencing the use of chemicals at end user level. As a secondary objective, the action aims to increase awareness on the fact that safe-use information generated through the registrants' CSA as exposure scenarios is meant to be communicated down the supply chain until it reaches the end-users (e.g. industries producing articles, companies involved in building and construction, other service companies, formulators of chemicals for consumer use).

4. Overview of expected activities

The action will identify i) indicators, in cooperation with relevant stakeholders, that can be easily measured and ii) who of the stakeholders could be partners in the data collection. Based on this information, monitoring system options will be proposed to the ENES Coordination Group who will decide on the approach to be taken. The selected option needs to be economic/realistic and allow the assessment of:

- Do end users receive *safe use* information consistent with the registrant's CSR (*in SDS, ES or SUMI*)?
- What do they do with this information?
- What changes have this information induced in companies' safety management practices, site processes or product (article) design?
- To which extent and how do end users feed back to their suppliers regarding the format and content of the safe-use information?

Deliverable	Responsible	Timeline
Indicators identified	ECHA	1 st half 2018
Information gathering options identified	ECHA	Summer 2018
Monitoring system proposal	ECHA	September 2018
Monitoring system adoption	ENES Coordination Group	October 2018
Monitoring system presentation	ECHA	ENES12

⁹ ENES Work Programme to 2020

¹⁰ Consists of indicators (easy to understand, measurable, analytically sound), the methods and frequency of gathering the information.

ENES Action 5.2

Carry out market research to identify exposure scenario information (content) useful for different groups of end users.

1. Participants

Lead: ECHA (contact: Andrew.MURRAY@echa.europa.eu)

Participants: ECHA, UEAPME, FIEC, Norwegian Environment Agency.

2. Motivation

(Downstream) End users of chemicals (e.g. industries producing articles, companies involved in construction and building, other service companies, formulators of chemicals for consumer use) are diverse businesses and make a significant contribution to the European economy and employment. End users utilise chemicals (either as substances or in mixtures) in their workplaces, either directly in a production process or ancillary to it. End users do not consider themselves in the “chemicals business” and many of them believe that they are not equipped with the on-site competencies of (eco)toxicology to carry out own assessments. Nevertheless end users need to be able to identify and utilise the new “safe use” information that has become available from REACH and CLP since 2010, to ensure safe management of chemicals in their business. To date, the information is:

1. Not available, or
2. It is difficult for the recipient to identify and understand the information relevant to his business (*The content does not help to use a chemical safely.*)
3. It is provided in variable layouts, bulky and difficult to handle within companys’ existing document management systems. (*The layout does not support good understanding.*)
4. Limited in its added value to existing safe use practices. (*For example, the content does not add any information the recipient had not considered already before.*)

3. Objectives for 2018

In 2018, the focus will be on the relationship with **workplace risk assessments**. The relationship to **control of industrial emissions** will be addressed in 2019/2020.

Overall, the objective is to ensure that the ENES community improves its knowledge on what kind of information end users need from suppliers, taking into account the different European legislative frameworks for preventing exposures / releases of hazardous substances at the workplace.

The objectives are the following:

- a. Understand what end users of chemicals (different types) can concretely do in terms of safety at the workplace with the safe-use information generated and communicated under REACH.
- b. Make available examples for demonstrating how it would work in practice.
- c. Identify where (ENES) tools require adaptation or extension, and set up a plan to improve them.

4. Overview on expected activities

The following outputs are required:

1. Surveys among different industry and Member States on their information needs for safe-use.
These will include interviews and on-line surveys with different groups and countries.
For example:

- To obtain numerical information on the availability of the REACH exposure scenario in different end user industries e.g. textiles, rubber, engineering (in Italy, Finland);
 - To understand how suppliers selling chemical products (e.g. coatings, metal part cleaners) to the engineering industries handle the communication on exposure scenarios for their products (in Finland);
 - How safe-use information helps end users meet obligations for occupational health and safety (in Italy, Finland).
2. Work out a gap analysis and possible solutions.
 3. Test the solutions with industry and Member State stakeholders e.g. a mapping of extended SDS elements that feed into a workplace risk assessment for a hazardous substance.
 4. Produce worked examples/solutions.
 5. Work out a plan to adapt/simplify/create tools + explanatory guidance to help end users.

Deliverable (activity)		Responsible	Timeline
1	Market research		
1.1	Survey report(s).	ECHA	04/18
1.2	Gap analysis and solution proposals.	ECHA	07/18
2	Agreement with stakeholders		
2.1	Workshop	ECHA	09/18
3	Tool update(s)/Guidance		
3.1	Worked example(s) published.	ECHA	11/12
3.2	Plan written for tool update(s)/simplification/creation.		12/18

ENES Action 6.1

Analyse current communication practice on risk and risk management through the supply chain (Research project REACH2SDS)

1. Participants

Lead: Federal Institute for Occupational Safety and Health (BAuA), Nicoletta Godas, reach2sds@baua.bund.de

Participants: BAuA, ECHA for support and Lead Registrants of the 100-1000 tpa band via questionnaire and workshop.

2. Motivation

The implementation of the REACH Regulation has confronted both industry and authorities with numerous challenges, including the practical implementation of the REACH exposure scenario requirements. To adequately cope with these challenges, industry, the Member States, and ECHA need to combine efforts to work on solutions.

To approach this matter, the German Federal Institute for Occupational Safety and Health (BAuA) has recently initiated the research project 'REACH2SDS', which has become Action 6.1 of the new ENES Work Programme.

With the REACH2SDS project, BAuA aims to obtain scientifically robust data on the current communication of risk and RMM throughout the supply chain of registered substances by analysing both REACH registration dossiers and extended SDSs. Furthermore, the project will investigate the suitability of the data given in extended SDSs to perform a reliable workplace risk assessment. The results will be used to develop approaches to improve the supply chain communication and to reduce still existing challenges concerning the interface between REACH and Occupational Safety and Health. <https://www.baua.de/reach2SDS-en>

3. Objectives for 2018

The objectives of this project running until the end of 2020 are:

In 2019 to:

- Assess the fulfilment of data requirements on occupational exposure and risk management measures in the chemical safety report (CSR) of REACH registration dossiers for substances between 100 and 1000 tpa.
- Investigate how registrants transferred the outcomes of the chemical safety assessment from the chemical safety report (CSR) into the corresponding extended safety data sheets. (*Links with action 1.4.*)

Followed by:

- Testing the suitability of the information presented in the extended SDS for an employer to perform an adequate workplace risk assessment using the BAuA-developed workplace control scheme for hazardous substances (EMKG¹¹).
- To ensure the outcomes of this project will be of relevance and practically helpful to all, the results will be used to develop a workshop addressing the project's stakeholders.

4. Overview on expected activities

In order to achieve the before mentioned objectives, the following activities are planned for 2018.

¹¹ The EMKG is a practical guideline for risk management involving activities with hazardous substances. It is intended (especially for SMEs) to help translate information from the eSDS and workplace into practical risk reducing measures.

In addition to the data analysis of the CSRs and extended SDSs a questionnaire is developed. The questionnaire is distributed to the lead registrants of the 100-1000 tpa band and aims at additional information on experiences with the development and application of extended SDSs. Therefore it addresses the following topics: 'Development / Compilation', 'Quality Management', and 'Communication', as well as personal view on the value of the extended SDS.

Deliverable	Responsible	Timeline
CSR analysis	BAuA	Q1-Q4/ 2018
Contact lead registrants of the 100-1000 tpa band and distribute questionnaire on current practice regarding extended SDS.	BAuA	Q1/ 2018
Collection of extended SDS	BAuA	Q1-Q4/ 2018
Evaluation of the questionnaire	BAuA	Q2/ 2018
Deliverable: Presentation of interim results at ENES12	BAuA, ENES Coordination Group	Q4/2018

5. More information

Contact andrew.murray@echa.europa.eu or echa_enes@echa.europa.eu

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