

ECHA Stakeholders' Day 2017

Session: Using Chemicals Safer in Europe

„Tips & Tools for Chemical Safety Reports (CSRs)“

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Agenda

- (1) The Company: *at a glance*
- (2) REACH Deadlines and their consequences
- (3) Tips and Tools
- (4) Feedback and Outlook

(1) At a glance: the company

Bruno Bock Thiochemicals & Evans Chemetics

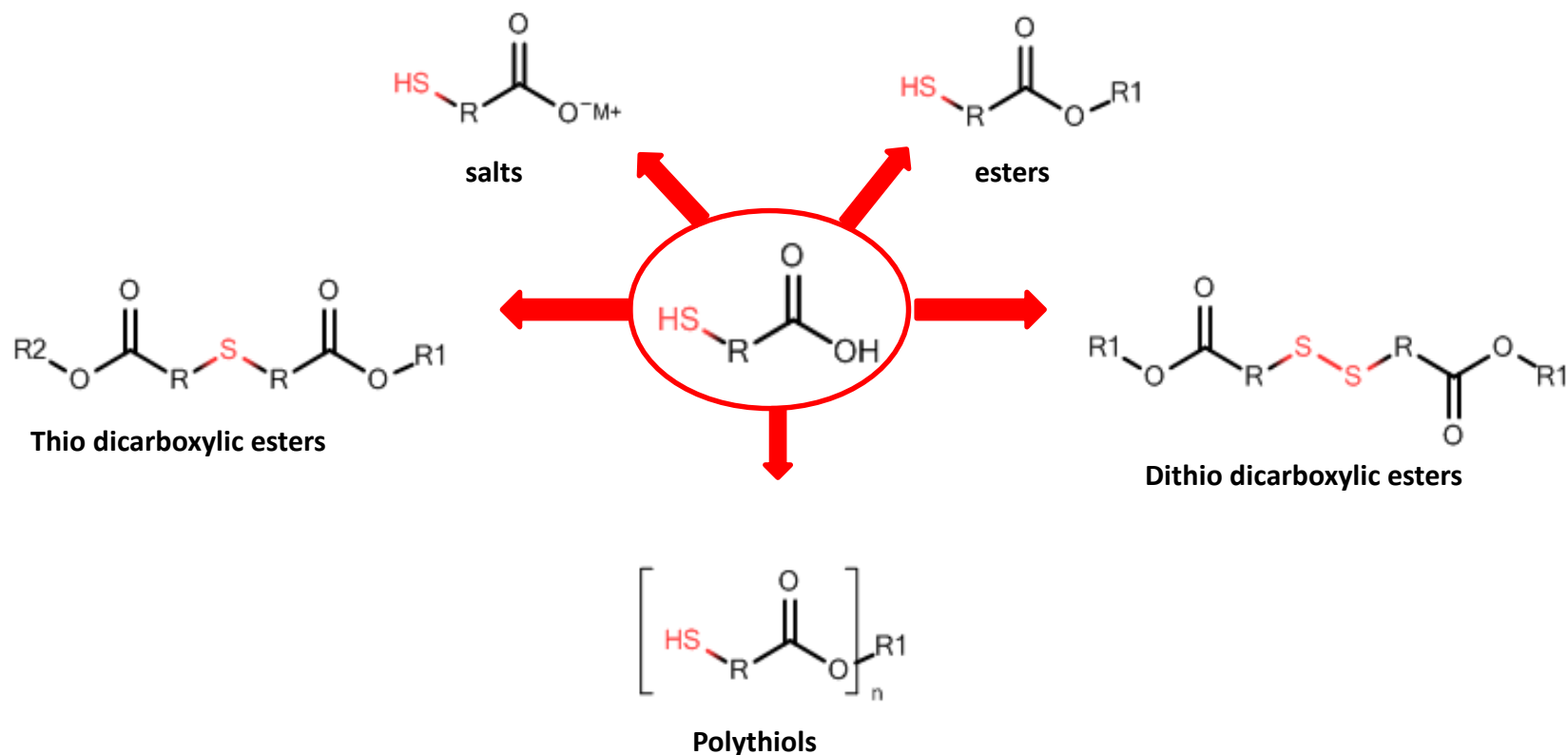
- Preeminent suppliers of organic sulfur specialty chemicals
- 2 production sites (3 locations) in Germany and the USA with >170 employees
 - not micro (< 10), not small (< 50), but mid-sized < 250
- Worldwide network of agents and distributors to serve customers in >45 countries



(1) At a glance: Our Products

Organic sulfur specialty chemicals:

- Mercaptocarboxylic acids and derivatives



(1) At a glance: Applications

Personal & Home Care

(Hair Cosmetics, Cleaners, Leather)



Plastics

(Antioxidants, PVC stabilizers)



**Organic Sulfur
Specialty Chemicals**

Polymer Synthesis

(Chain Transfer Agents)



Coatings, Adhesives, Sealants

(Hardeners, Binders, Crosslinkers)

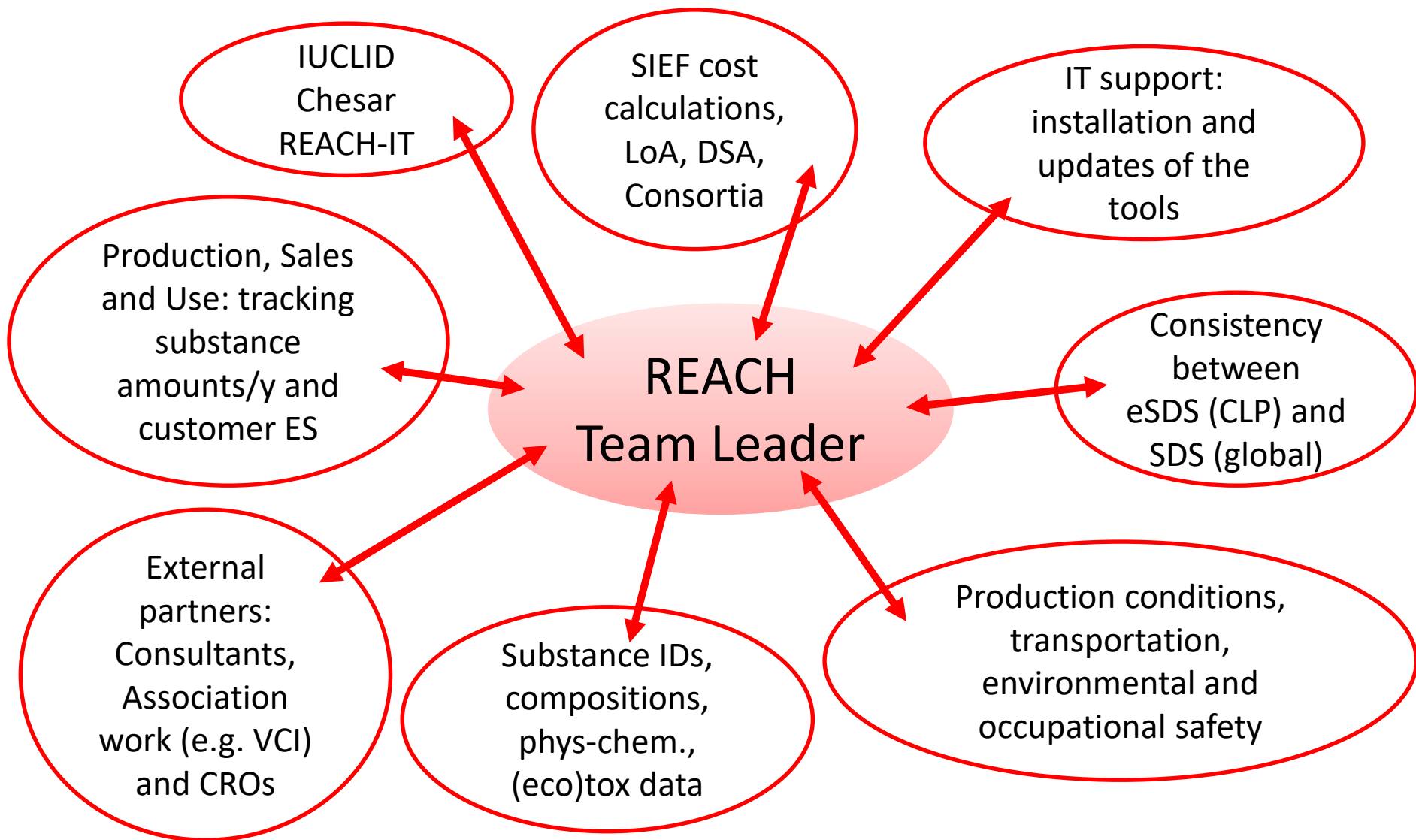


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(1) At a glance: The REACH Team

Coordination of Projects and Mgmt of Communication



(1) *At a glance:* Our Role under Reach

- SME, Lead Registrant and OR
- Manufacturer and importeur
- Pure substances, no complex formulations
- No CMRs
- No PBTs

(2) REACH Deadlines and their consequences

2010 Company Target:

- Collect experience with REACH and be on the safe site.
- only one consultant company doing the main work (communicate within the supply chain/customers, monitor experimental studies, submit the dossiers)
 - 1 Co-registration
 - 4 as transported isolated Intermediate under SCC
 - 3 full registrations >1000 t/y

2013 Company Target:

- Under REACH an SME should be able to submit a complete dossier
- only marginal consultant work, main work by the internal REACH team
 - 0 Co-registration
 - 2 as transported isolated Intermediate under SCC
 - 8 full registrations >100 t/y

(2) REACH Deadlines and their consequences

SME: Summary of the Deadlines 2010 and 2013

- A submission is not an easy job especially for SMEs
- Specific expertise not always in-house available
- The real exposure situation related to occupational health and the environment at Bruno Bock which is historically controlled by national laws is not well reflected under REACH
- The downstream use of our products are in some cases not realistic described by our customers. Risks were therefore overestimated under REACH (conditions of use and risk management measures)
- External support seems to be strongly recommended, but depends on the situation of the SME and their obligations under REACH

2018 Company Target:

- Avoid animal experiments, close data gaps by using data from 2010 / 2013 registrations.
- Many consultants involved: QSAR, Read-across, Weight-of-Evidence approaches
 - 4 Co-registration
 - 2 as transported isolated Intermediate under SCC
 - 4 full registrations >1 t/y (no CSR)
 - 10 full registrations >10 t/y

(3) Use Maps

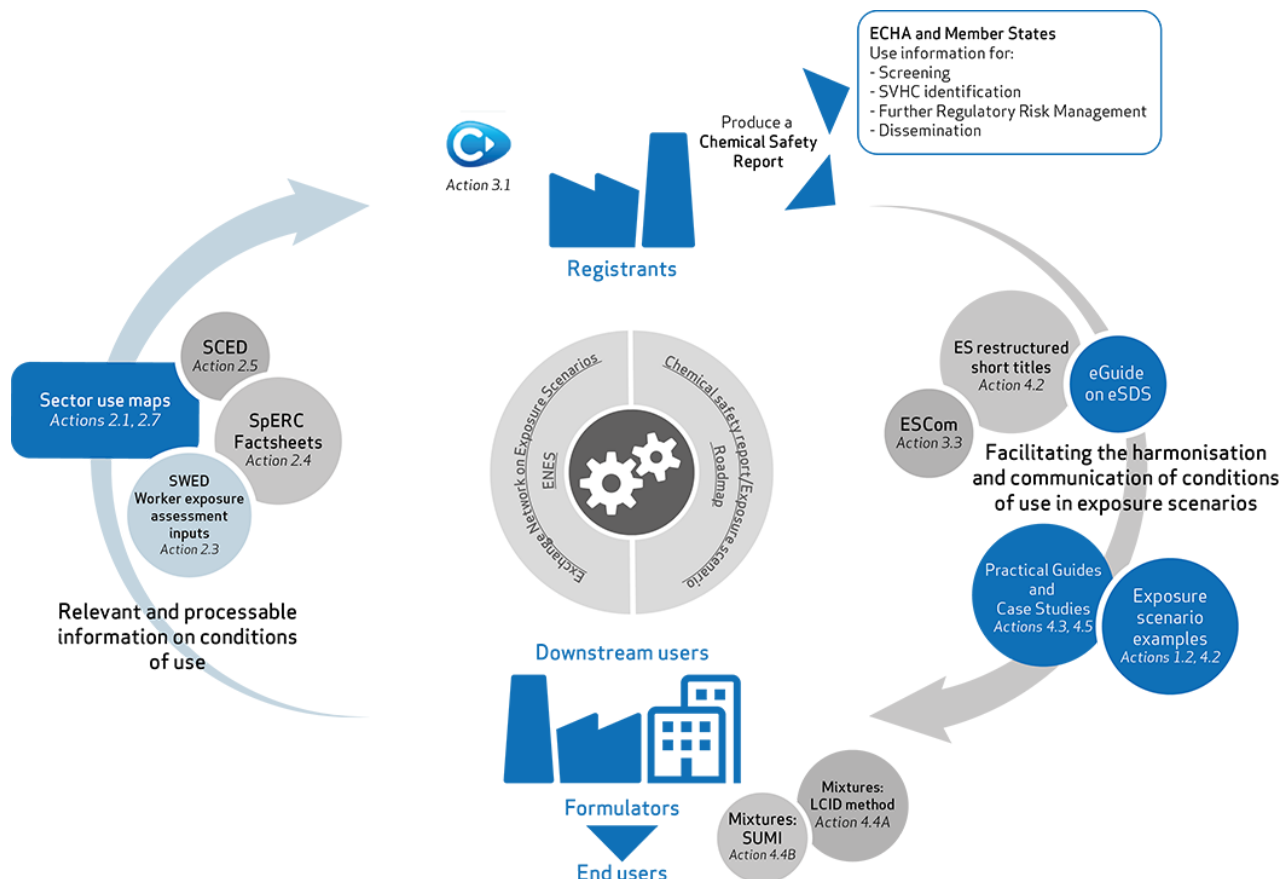
On-site: Manufacture and Fillings:

Documentation of the real exposure situations for the environment and for the workers, which can be used under REACH (via Chesar) as well as under national law.

Customer-site (Use of our products):

REACH–SECTOR USE MAPS: ECHA and Industry Collaboration

Sector use maps describe the uses of the chemical and also have links to the information needed to carry out exposure assessments.



(3) IUCLID 6: Hazard Tool

The screenshot displays the IUCLID 6 software interface. The main window title is "IUCLID 6" and the menu bar includes "File", "Edit", "Users", "Admin", and "Help". A search bar at the top right is labeled "(Search by UUID)". The navigation panel on the left shows a tree structure under "REACH Complete table of contents", with "3.5 Use and exposure information" expanded to "3.5.1 Manufacture", and "Manufacture of ATG" selected. The main content area shows the "Manufacture" section with the following fields:

- Registration/ Notification status for the use: [Dropdown menu]
- Manufacture number: 1
- Manufacture name: Manufacture of ATG
- Further description of manufacturing process: Neutralization under cooling of mercaptoacetic acid 99% with aqueous ammonia solution 31% under strictly controlled conditions.

The information panel at the bottom contains the following details:

- Type: Flexible Record
- UUID: 0a34670e-8b94-3f04-abb2-3ebc66f4bd02
- Dossier UUID: [Empty field]

Additional features in the information panel include "Clipboard manager", "Attachments", "Modification history", "Annotations", and "References".

(3) Chesar: Exposure Tool

chesar

Selected Substance: **ECHA substance** Selected CSA: **CSR example**

Substance Management
 CSA Management
 Substance Identity
 Phys-Chem Prop / Fate
 Phys-Chem Hazard
 Environmental Hazard
 Human Health Hazard
 Scope of assessment

Environment

		Risk characterisation type
Water	Freshwater	Quantitative
	Sediment (freshwater)	Quantitative
	Marine water	Quantitative
	Sediment (marine water)	Quantitative
	Predator (freshwater)	Not needed
	Predator (marine water)	Not needed
	Top predator (marine water)	Not needed
	Sewage treatment plant	Quantitative
Air		Not needed
Soil	Agricultural soil	Quantitative
	Predator (terrestrial)	Not needed

Workers

		Risk characterisation type
Inhalation	Systemic, long-term	Quantitative
	Systemic, acute	Not needed
	Local, long-term	Qualitative
	Local, acute	Qualitative

(3) Chesar: Exposure Tool

chesar Logged in as: schv

Selected Substance: ECHA substance Selected CSA: CSR example

Information on calculation

	Exposure	RCR
<input checked="" type="checkbox"/> Inhalation, systemic, long-term	0.125 mg/m ³	0.005
<input type="checkbox"/> Inhalation, systemic, acute	0.5 mg/m ³	
<input type="checkbox"/> Inhalation, local, long-term	0.125 mg/m ³	
<input type="checkbox"/> Inhalation, local, acute	0.5 mg/m ³	
<input checked="" type="checkbox"/> Dermal, systemic, long-term	0.034 mg/kg bw/day	0.005
<input type="checkbox"/> Dermal, local, long-term	0.01 mg/cm ²	

Conditions of Use

W-1	Product (article) characteristics	Concentration of substance in mixture	Substance as such
W-2	Amount used (or contained in articles), frequency and duration of use/exposure	Duration of activity	< 8 hours
W-3	Technical and organisational conditions and measures	General ventilation	Basic general ventilation (1-3 air changes per hour)

(3) Outcome: CSR and the „e“ of the eSDS

CHEMICAL SAFETY REPORT -
CHESAR
CHEMICAL SAFETY REPORT - CHESAR

Interaction with IUCLID

1

ES-FOR-COMMUNICATION,
ES-FOR-COMMUNICATION,

Substance Name: ECHA-substance{

EC Number: {

CAS Number: 11111-11-1{

Registration Number: {

Date of Generation/Revision: 10/09/2013{

Author: { Abschnittswechsel (Nächste Seite)

Only the extension of the SDS
SDS Chapters 1-16 still missing

(4) SME Feedback 2014

Interview given for
ECHA Newsletter 2/2014:
Get wise – use Chesar

Main advantages:

- Tool from ECHA itself
- CSR- and eSDS preparation by one klick
- Inhouse database
- Data exchange format with partners and consultants



#2 April 2015
Issue 2

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Article related to: reach

Get wise – use Chesar

Dr Dirk Schwartz from Bruno Bock Thiochemicals has experience from both REACH registration deadlines. Ahead of the second deadline in 2013, his small and medium-sized (SME) company decided to manage their registrations in-house. For the chemical safety assessment included in the registrations, his company uses ECHA's Chemical Safety Assessment and Reporting tool, Chesar. "For me, Chesar is a key tool for managing the safety and exposure of our chemicals," he says.

For the first registration deadline in 2010, Bruno Bock registered eight substances with the help of an external consultant. In 2013, 10 more substances were registered. "We decided in 2011 that we would use the IUCLID and Chesar tools and do everything on our own. We really felt confident that an SME could manage its own registrations," Dr Schwartz mentions.

A clear advantage was that the company has detailed knowledge of the chemicals it produces. "Our substances have a very clear chemistry; we know the uses, the toxicology and we have everything very well documented. We don't have any CMRs (carcinogenic, mutagenic or toxic to reproduction) or PBTs (persistent, bioaccumulative and toxic) in our portfolio – the hazard we have to care for is sensitisation and toxicity in general. We thought that with this knowledge it must be possible to submit a registration."

Increased independence through Chesar

Dr Schwartz was not familiar with Chesar and needed training before he could start using the tool. "I attended a two-day webinar on the use of Chesar. This reassured me that I could start with the tool."



Dr Dirk Schwartz.

He is now convinced that Chesar is the best tool for chemical safety assessments.

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(4) How can SMEs be supported?

1. Memorandum for shortlistings and compliance checks until 1 June 2018

SMEs do not have the power to cope with all other REACH tasks during registration work and consultants are fully booked until June 2018

2. More support from national authorities for the ECHA tool Chesar

In the past 3 years, Chesar was not even mentioned at national workshops and conferences.

3. Report-Generation in IUCLID of chapters 1 to 16 of the SDS

- Full legal document from authorized (ECHA) software
- Complete eSDS based on submitted data
- Only one system no transfer work between different IT systems
- No exchange formats needed
- Safe of time and money
- UN and OECD supported

Thank you for your attention



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