Communication on safe use of chemicals in the supply chain – basic principles and next steps

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Basic pillars of chemicals legislation

Safe use of chemicals

Knowledge

Regulatory action
“10%” of substances

Communication in supply chain
Information on uses
Hazards
Use restrictions
Safe use advice

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**REACH paradigm: The basic principles**

- Registrants’ chemical safety assessment:
  - Generates advice on safe use for whole supply chain (worker, consumer, environment).
  - Informs authorities about uses.
- Extended safety data sheets:
  - Provide concrete, task-specific advice on safe use for hazardous substances and mixtures instead of
    - "ensure appropriate ventilation where needed"
    - "avoid contact with skin"
  - Provide DNELs/PNECs complementary to classification (in particular, relevant where no OEL exists).
  - Trigger obligations on the recipient’s side: Follow recommendations received or carry out own assessment.
The Challenge

- **Assessor at the top of the supply chain** expected to:
  - **Differentiate** the safe use advice according to:
    - The identified uses in the life cycle of the substance.
    - The variety of the operational conditions existing.
    - The risk management measures appropriate to the use and sector of use.
  - **Communicate** relevant and targeted advice in a terminology understandable to recipients.
- **Single formulator**, transforming substance level incoming exposure scenarios into safety instructions for his products. May be up to:
  - Several 1000 exposure scenarios from 100s of suppliers;
  - To SDS for 10,000 and more products.

The Challenge (cont.)

- **REACH added exposure scenarios** from chemical safety assessment to the front end of companies’ existing safety data sheet authoring systems without setting:
  - Integration rules.
  - Minimum requirements in terms of content and structure.

All this, based on use information to be obtained from a complex, diversified and competitive market.
How to move ahead / What to do?

- Develop **minimum requirements for exposure scenarios** (COM to make them binding) supporting one holistic [coherent] system for all actors in the supply chain => Synchronise the system.
- Support development of **methods** and corresponding **tools** where gaps still exist (in particular for formulators)
- Prepare the ground for **digitalisation** of safety data => Make system efficient.
- Demonstrate concretely how REACH can satisfy **end user information needs** and “sell” REACH exposure scenarios to OSH and IED communities => Make system effective.

By this, ensure that REACH reaches out to safe use of **all chemicals** (and not just those where authorities had initiated regulatory action).
Unit B4 – Exposure & Supply Chain