Overview

• Communication of safe use advice to Downstream Users (DUs)

• Challenges faced by registrants
  • On going administrative updates / IT tools.
  • Variety of IT tools for eSDS authoring
  • “The Mixture” eSDS issue
  • Provision of safe and healthy workplace and conditions of work
Safe Use communication

Registrants

CHESAR output
SDS authoring / Ext-SDS

CHESAR input
SwED/Use Map

GES

Registrants
Formulators

Downstream users

Workplace risk Assessment

OCs / RMMs

Sector Use Maps

Uses

OCs / RMMs

Supply Chain communications

Formulators

CHESAR input

SwED/Use Map

GES

Challenge 1 –Ongoing Administrative Updates (IT tools)

- ES and CSR produced in CHESAR based on GES or Sector Use Maps
- Format (ES template)
  - Table of Content linked to; Short titles/ES naming convention
  - Some sector use maps have long titles to describe variations in the conditions of use
  - Repetition of operational conditions for different activities

If registrant use “full” Use maps as default

Identify which Uses/ tasks might apply

If information is not available from marketing etc.

All use map information uploaded

Concentration / Duration reviews for x00s for workers, consumers and environment

Data collection where no use maps exist

Tool: Chesar

Registrant selects and uploads the relevant use maps

Tool: Chesar

Registrant

Remove uses, contributing activities, substance forms not relevant (company knowledge)

Tool: Chesar
Challenge 1 – Ongoing Administrative Updates (IT tools)

- Content → ESCOM Standard Phrase Catalogue
- Missing phrases (e.g. non-std RMMs)
- Management of Change (MOC) process
- Translation within IT tools / registrant

(ESCOM has few languages at the moment)

- The complex map on a previous slide shows the tremendous level of administrative updates and communications that must be managed by the current expectations, and the need for a robust MOC

Challenge 2 – IT tools for eSDS authoring

- Various (third-party) SDS authoring systems used
- No direct electronic import of ES
  - Requires copy-paste
    - Not efficient
    - Not consistent
    - Prone to manual errors
    - Needs QA check
- ESCOM XML standard as a potential solution
  - ES filled 100% with standard phrases
Challenge 3 – eSDS for mixtures

- Who knows the Downstream uses best
  - Registrant or formulator?
- Formulator needs to understand and convey substance information to DU
  - Registrant needs to know Uses and existing RMMs and OC in place in the supply chain
  - Registrant completes substance CSR and shares safe use via ES in eSDS

- Formulator provides safe use for a mixture
  - Formulator can provide ESs from all substances in a mixture
    - Different registrants, possibly different formats
  - Communication format depends on the mixture (i.e. classification, uses)
    - Lead Component Identification (LCID)
    - SUMI selection method
    - Different type of end user
    - Flexibility is a key
  - Safe use of hazardous mixtures at DU level requires
    - Alignment with
      - Safe use information as part of REACH process, Workplace risk assessment, Industrial emissions permitting
Stakeholders proposals / considerations

- Considerations for discussion
  - Should the RCR <1 for chemical safety assessment be clearer defined (0.9, 0.5 etc)

- How can the Maximum concentration for use of a substance in a mixture be used to drive efficiency

- Identify if mapping between Generic Exposure Scenarios (GES) and sector use maps can be improved

- ESCom XML standard as a potential solution with ES filled 100% with standard phrases

- Is there a need for a Management of change process to be put in place (inc IUCLID/Chesar link)

- How can the distribution of electronic eSDS be facilitated, and is it needed
  - Identify solutions for provision of Electronic / interactive SDS

- Tools for IT solutions to communicate e.g CHESAR to SDS authoring or equivalent XML

Questions?
Additional text slides

Management of change

Change Management Process

1. Request for Change
2. Impact Analysis
3. Approve / Deny
4. Implement Change
5. Review / Reporting
Management of change

Phase 1 – Preparing for Change
- Define your change management strategy
- Prepare your change management team
- Develop your sponsorship model

In Phase 1 – Preparing for change
Identify anticipated points of resistance and special tactics based on readiness assessments

Phase 2 – Managing Change
- Develop change management plans
- Take action and implement plans

In Phase 2 – Managing change
“Resistance management plan” is one of the five plans created as a deliverable

Phase 3 – Reinforcing Change
- Collect and analyze feedback
- Diagnose gaps and manage resistance
- Implement corrective actions and celebrate successes

In Phase 3 – Reinforcing change
Collect feedback, audit compliance, diagnose and address gaps, look for pockets of resistance
Safe use information to the DU

- How to ensure the health and safety of DU is maintained when working with mixtures
  - Information to support the workplace risk assessment from REACH
  - Information instead of the workplace risk assessment from REACH
  - Ambiguous information from REACH and OSH processes

- Formulator to DU communication for mixtures
  - Forward OC/RMMs and annex from substance SDS
  - Formulator to share safe use information
    - DU CSR/ SUMI/ ???

- Up supply chain communication of uses via Sector use maps, SWEDs