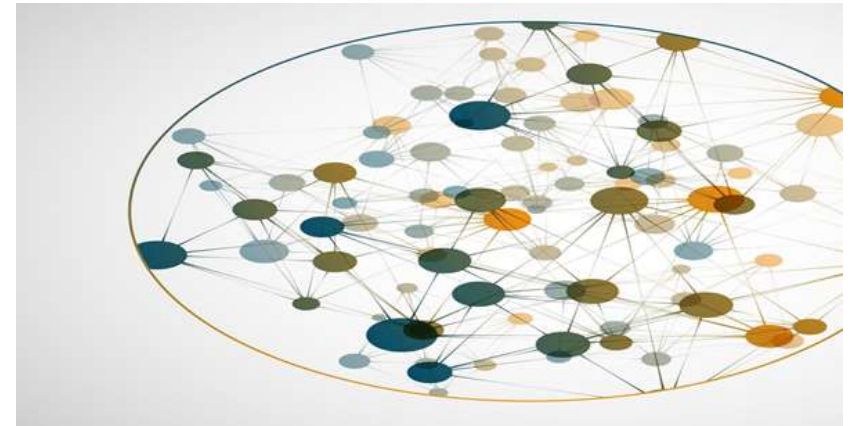


Fecc Guidance



MANAGEMENT OF ES INFORMATION IN SDS - DISTRIBUTORS' CONSOLIDATION METHODOLOGY

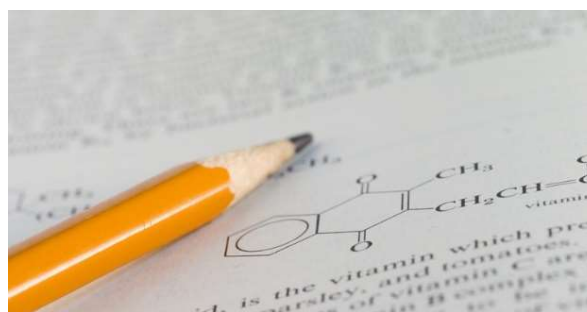
Giovanna Cozzupoli
14 November 2018

INTRODUCTION

Chemical distributor in the supply chain of communication

Main Responsibility

TO PASS ON RELEVANT SAFETY DATA SHEET (SDS) AN EXPOSURE SCENARIO (ES)!



MANAGEMENT OF ES INFORMATION IN SDS



Problem: Distributors frequently observe significant inconsistencies in the information on safe use they receive for the same registered substances from different suppliers.

Need: In case for ESs the increases of information received from suppliers should be communicated in a consolidated way.

Solution: So a tool was needed to forward the next level in the supply chain communication that consistently information and no increment.

MANAGEMENT OF ES INFORMATION IN SDS

The Fecc considers in the Distributors' Consolidation Methodology

The consolidation methodology is in line with the principles describes in the ECHA Guidance for Downstream User (DU) principle in terms of:

- Collating the information received from suppliers
- Identifying the information that is relevant to communication downstream and
- Communicating the information effectively

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Working with consolidation methodology

1. Exposure Scenario compliance check

- Outline the groundwork
- Identify the relevant ES
- Check compliance for the environment
- Check compliance for workers

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Working with consolidation methodology

A. Outline the groundwork

Create an overview

- Have I identified all my relevant uses?
- Have I described the OC and identified the RMM for each use?
- What training will be necessary for the staff?

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Working with consolidation methodology

B. Identify the relevant ES**Section 1 Title of Exposure scenario: ES/use name**

- Are all my uses and foreseeable uses of my product by my customers identified in the title section of one or more of the exposure scenarios?
- Is the use title applicable to these uses?

Section 1 Title of Exposure scenario: scope

Do the contributing exposure scenarios based on the Use Descriptors cover all tasks or processes relevant for my uses in the contributing scenarios? (matching PROCs/ERCs)

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Working with consolidation methodology

C. Check compliance for the environment

Section 2: Operational conditions and Technical measures

- Do the product/substance characteristics (such as form [liquid/powder/-granular/pellet], volatility and viscosity, concentration of substance in mixture) match those specified in the exposure scenario?
- Are the processes, technologies and the conditions which control the release of the substance into the working environment (such as amount used, transfer system, containment, frequency and duration of use,) in line with the recommendations in the exposure scenario?

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Working with consolidation methodology

D. Check compliance for workers

Section 2: Operational conditions and Risk management measures

- Are general ventilation conditions (air change rate, room volume, indoor/outdoor) met?
- Are the risk management measures indicated in the exposure scenarios used?
- Is the effectiveness / type of RMM in line with exposure scenario requirements?

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Working with consolidation methodology



Outcomes of the checking

If the check demonstrate compliance with received ES
No further action is needed.

If the check does not immediately demonstrate compliance with received ES you can do the following :

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Working with consolidation methodology

- ✓ Scale to check/demonstrate that the conditions of use are within the boundaries of the ES, even though they appear to be slightly different from the description in the ES. Information on scaling should be provided as part of the ES.
- ✓ The PROC hierarchy may in some cases be applied to cover a PROC that is not mentioned explicitly in the ES. Some PROCs may encompass others.²
- ✓ Amend your own process/conditions of use to make them comply with the ES.
- ✓ Make a downstream user chemical safety report for the missing use / the deviating operational conditions and risk management measures.
- ✓ Check for alternative manufacturer whose ES covers your use.
- ✓ Substitute to another substance.

²Cefic, Ducc, Concawe, Fecc "Messages to communicate in the supply chain on extended SDS for substances II", Final version 13 July 2011. Annex II.

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Recommendations for communication of extended safety data sheets (eSDS) in the supply chain and to customers, when for example the same substance is sourced from multiple manufacturers.

Management of the eSDS database

Your eSDS must cover the uses of all your suppliers for a given substance and contain the appropriate ESs.

- When there is a single supplier, supplier's ESs are introduced directly into the eSDS database management IT system.
- When there are multiple suppliers for the same substance, a consistency check and a consolidation process need to be run.

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Consistency check

If all the ESs are the same, a consolidation process is run and suppliers' ESs are introduced into the eSDS database management IT system.

If the suppliers' ESs cover different uses that cannot be consolidated, these ESs may be introduced into the eSDS database management IT system as well. However, in these cases the model used for communicating downstream will be different.

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Communication models

- The communication flow from the suppliers via your company to your customers can be performed in according to these models:

MODEL 1 :A copy of the supplier's eSDS is forwarded downstream in the supply chain.

MODEL 2:The information in the supplier's eSDS is transferred to your own IT-system. The supplier's information is communicated downstream in the supply chain, now in your own eSDS format.

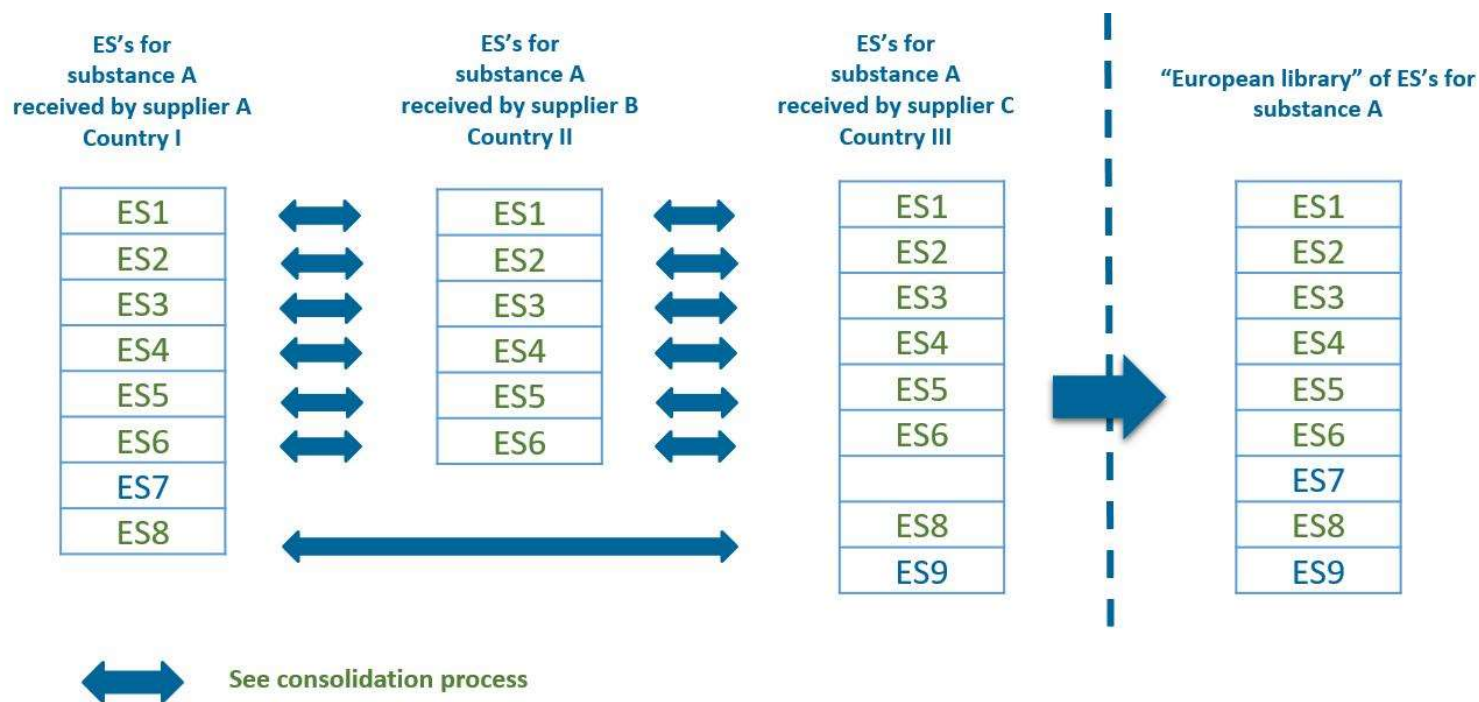
MODEL 3:The substance is purchased from multiple sources (from multiple suppliers = REACH-registrants). You choose to convert the information from the suppliers' eSDS into a consolidated version in your IT-system. The consolidated version is now communicated downstream in the supply chain.

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Communication models

Figure 1. Information input to the eSDS database

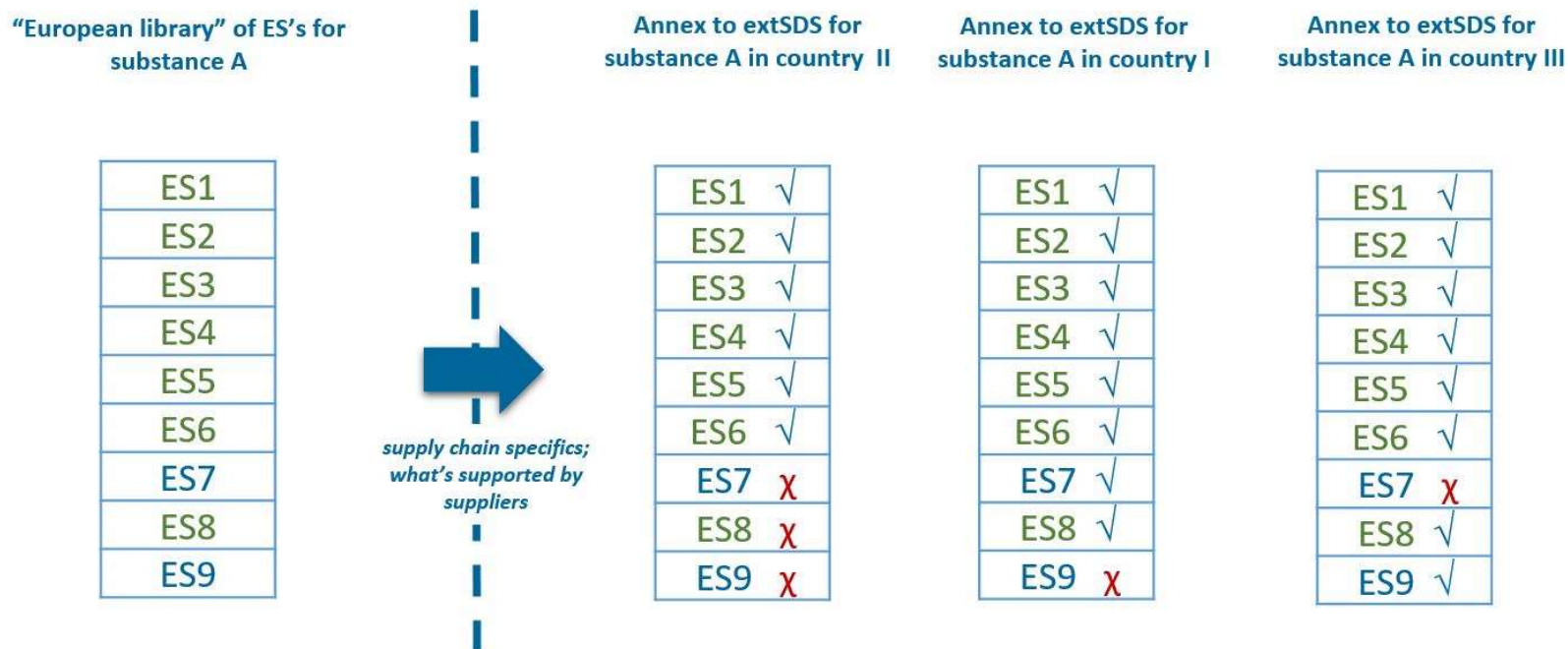


MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Communication models

Figure 2. Information input to the eSDS database



MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Alignment of Exposure Scenarios into consolidated versions

The consolidation of one ES means comparing and grouping data from different suppliers into your consolidated ES.

- I. Consolidation of the Use name (Numbers of ES; Shorttitle)
- II. Consolidation of Use Descriptors (ERC, PROC ect.)
- III. Consolidation of conditions of use: Operational Conditions (OC) and Risk Management Measures (RMM)

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Communication of the consolidated Exposure Scenarios

When communicating your own consolidated ES you are advised to consider the following points ECHA Guidance Part D Framework for exposure assessment³:

- The same way that you have received from your suppliers, you should build a separate ES for each identified use.
- Not all the ES received may be relevant to be communicated downstream in the supply chain.
- Harmonization should be sought in terms of both the structure and content of the ESs.

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Communication of the consolidated Exposure Scenarios

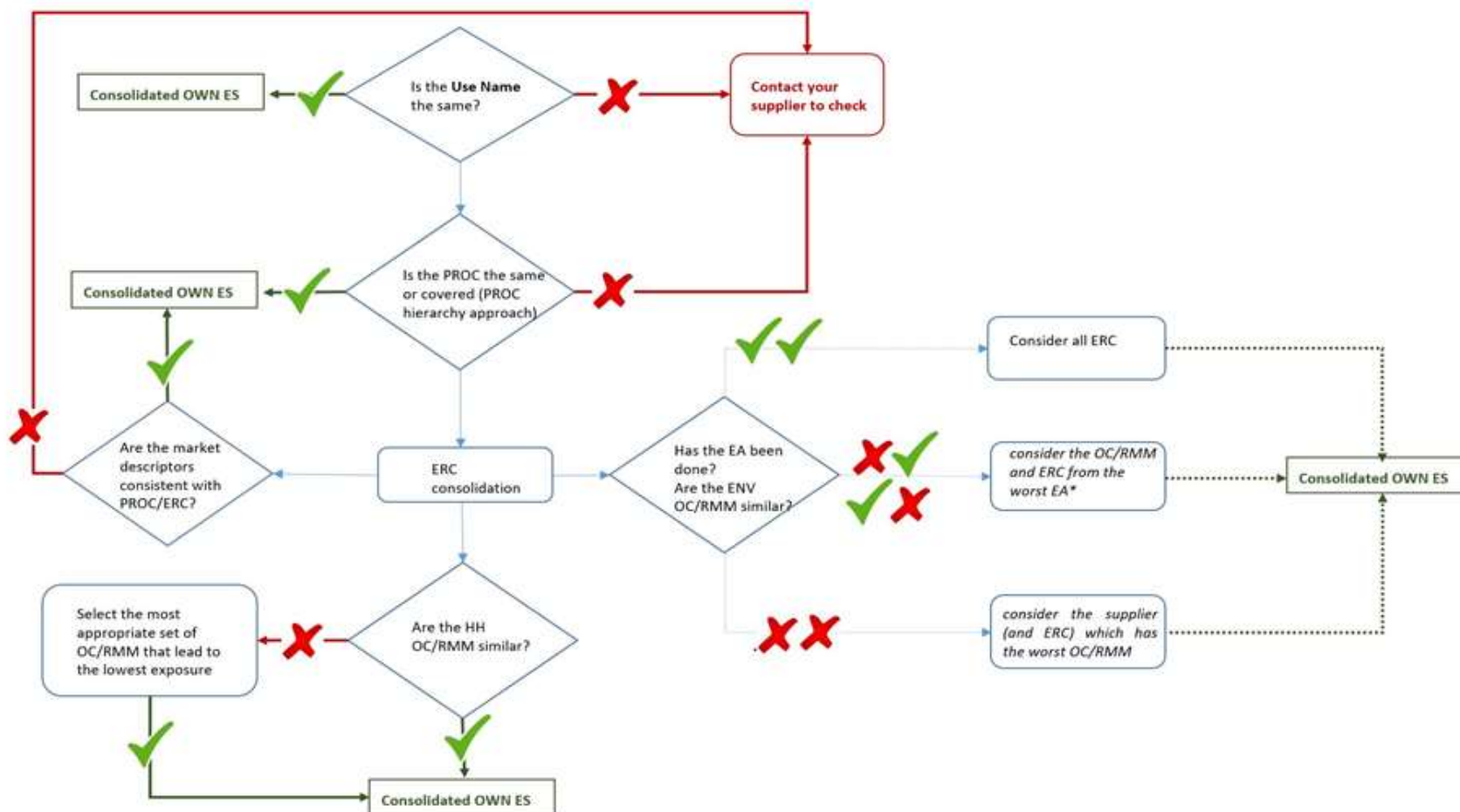
When communicating your own consolidated ES you are advised to consider the following points ECHA Guidance Part D Framework for exposure assessment³:

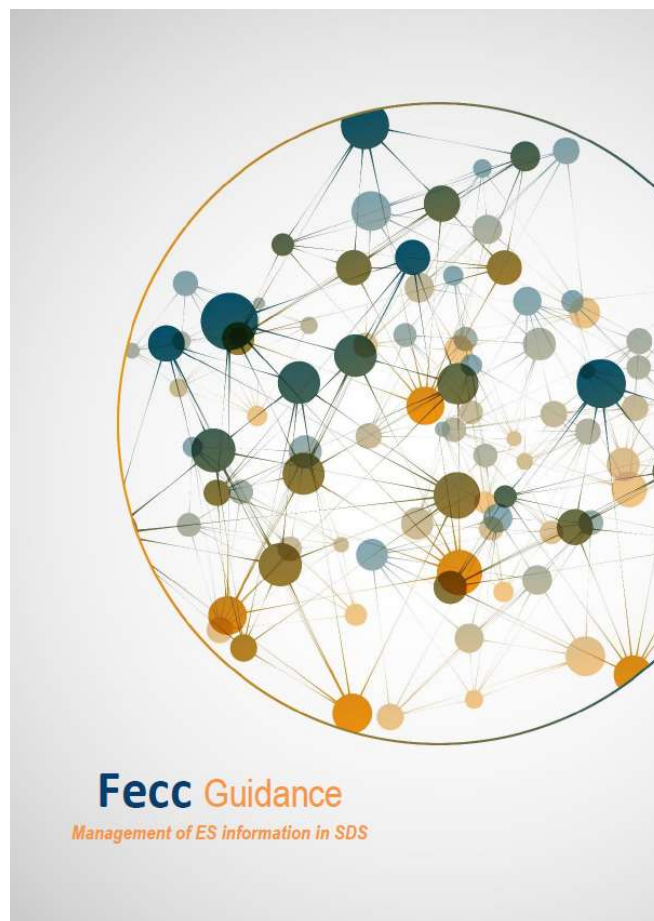
- the structure, the harmonized template published by ECHA⁴ is recommended.
- ESs are part of the SDSs and therefore they have to be translated into the language(s) of the recipient's country.
- The ESCom⁵ project has developed a catalogue of standard phrases for ESs which is available to be used by all interested parties and facilitates translations.
- The ESCom project has also developed an XML format to convey the ES information electronically in addition to the normal document format to be able to generate and receive ES in this way in order to avoid manual typing of the information into various systems.

MANAGEMENT OF ES INFORMATION IN SDS

Distributors' Consolidation Methodology

Exposure Scenario consolidation flowchart





Thank you for your attention 😊