



DUCC



Downstream Users of Chemicals Co-ordination group



DUCC/CEFIC pilot on Exposure Scenarios and Supply Chain Communication

(ENES actions 2.4 and 4.1)

2nd Scoping Workshop on REACH Review Action 3
23-24 September 2019
ECHA, Helsinki

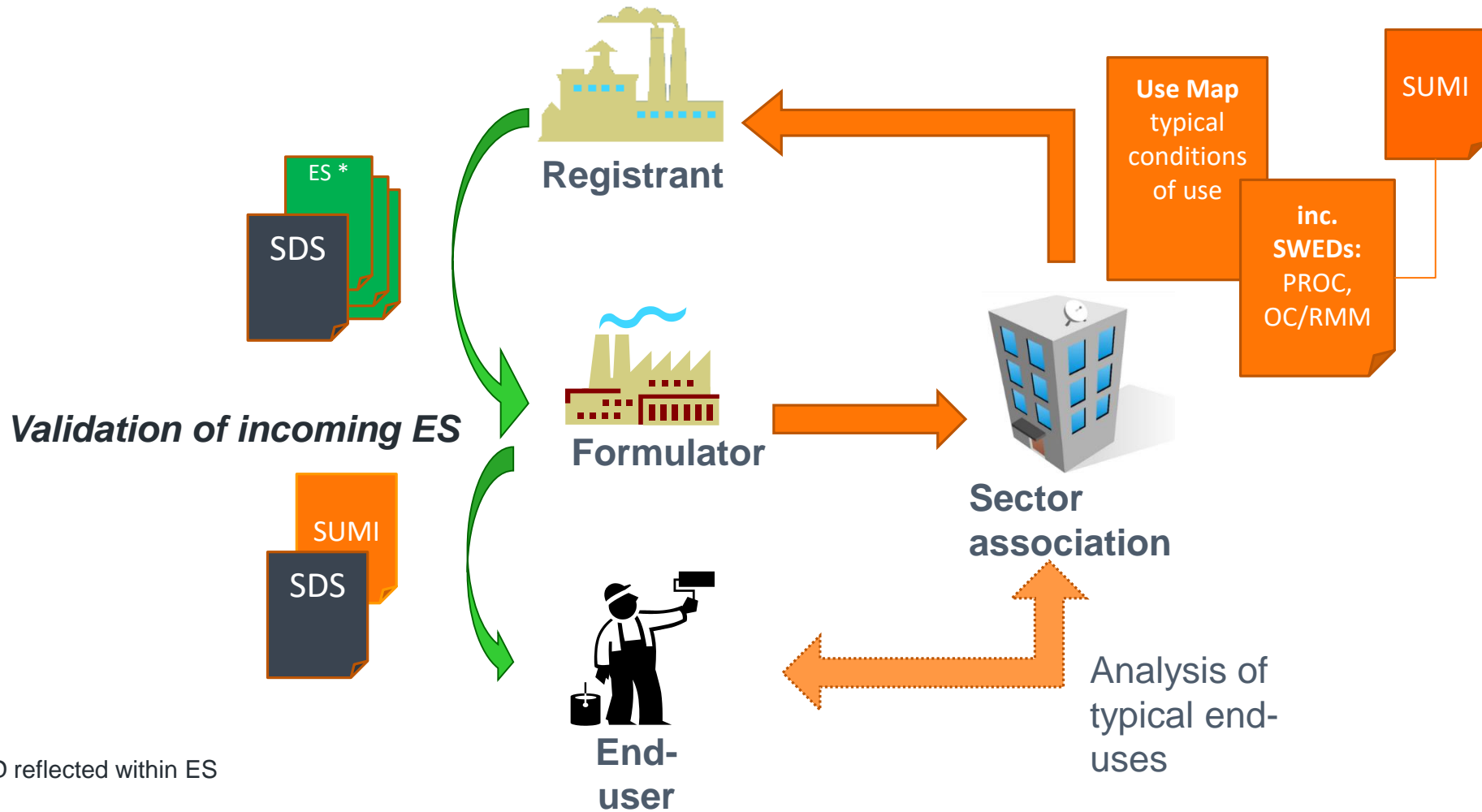
Pilot for registrants & formulators



- **Registrants' phase** (ENES action 2.4) – Oct-Nov 2018
 - Objective: to test the use of downstream sector use maps and Generic Exposure Scenarios (GES) by registrants to carry out exposure assessments and **generate exposure scenarios** (ESs) for communication

- **Formulators' phase** (ENES action 4.1) – March-April 2019
 - Objective: to collect experience of formulators on processing ESs generated based on use maps and GES, in order to **generate safe use information for a mixture** by selecting the appropriate SUMIs (Safe Use of Mixtures Information)

Communication in the supply chain with SWED/SUMI approach



*: SWED reflected within ES

SUMI approach

- Formulators' **tool for communicating** safe use advice to end-users
- Provides a common and consistent **framework** for all the formulating companies within a sector
- **One** piece of information for the entire mixture
- Safe-use advice based on **risk assessment** + Good practice advice (optional)
- Safe-use advice can be differentiated per contributing activity
- Technical **language** plus **pictograms** understood by recipients
- Facilitates the determination and creation of **workplace safety instructions**

MAIN OBSERVATIONS AND FINDINGS

Registrants' perspective

- CSA based on sector use maps works easily in practice at tier 1 level (Chesar, ECETOC TRA)
 - Consistent outcome
 - Efficient work-flow
- Nevertheless, deviations from use maps input and differences among registrants; possible causes:
 - measures added to cover qualitative hazards
 - input modified where not possible to demonstrate safe use with TRA
 - diversity in target setting for demonstrating safe use (e.g. differences in target RCR across registrants)
- Further room for improvement to reduce repetition of identical assessments

Formulators' perspective

- Use Maps and SWED / SUMI approach is easy to use, provided you are familiar with the concept
- Application of Chesar to generate ESs is very helpful
 - Harmonised/uniform ES format
 - Easy to navigate via Table of Contents (ToC) and ES title section
- Benefits materialise when all ES are based on a sector use map
 - Heterogeneous case (i.e. GES-based ESs) more burdensome (uses/CAs not matching sector use maps; OC/RMM not matching sector SUMIs)
- Issues also occur in homogeneous cases when registrant deviates from use maps input
 - Selection of SUMI not supported anymore
 - Nevertheless, formulators still supported in checking uses/CAs' + SUMI template can still be used for communication

CONCLUSIONS ON POSSIBLE IMPROVEMENTS

Suggested improvements - 1



- Harmonise and improve **format** and **layout** of ES
 - Generalise harmonised format for exposure scenarios (beyond Chesar)
 - Improve Table of Contents (ToC) to support formulators in navigating to relevant uses
 - Improve Title section of the ES to support quick identification of highest safe concentration under defined use maps conditions
- Development/implementation of more **intelligent systems** to transfer information
(e.g. xml exchange format should be achieved)

Suggested improvements - 2



- Include parameters for **higher tier** assessment within sector use maps (if relevant for the sector)
 - Most current use maps contain input for Tier 1 assessments only, which may limit the number substances for which safe use can be proven
 - Results of ENES action 3.2 “Harmonisation of workers CoU” may serve as a basis for inclusion of inputs for higher tier assessment tools into sector use maps

Suggested improvements – 3



- Elaboration of common rules on how **qualitative hazards** should be considered in use maps, registrants' ESs and SUMIs
 - Measures related to physicochemical and aspiration hazards
 - Measures related to eye protection
 - Measures related to skin protection

Suggested improvements - 4



- Normalise assessment:

- 1. Input for the assessment**

Assessor takes fixed packages of OC/RMM (SWEDs) from sector use map

- 2. Regular benchmark**

Assessment against RCR = 1

- 3. Output of the assessment**

Highest safe concentration for the substance assessed

Therefore, sector use maps need to

- integrate the “hierarchy of control” logic
- ensure that the set duration of activities takes into account aggregated exposure of worker due to different activities during the shift

Suggested improvements - 5



- Increase support to deal with **heterogeneous cases**
 - Check if mapping between Generic Exposure Scenarios (GES) and sector use maps can be improved

Suggested improvements - 6



- Elaborate further **Guidance** for registrants and formulators

To address common issues identified during the testing e.g.

- What to do if safe use can not be demonstrated based on use maps input?
- What to do if SWED/SUMI link is broken?
- How to address measures for qualitative hazards at level of use map, registrants' ES and SUMIs?