Workshop on REACH Review Action 3 *Improving the workability and quality of extended safety data sheets*

Solution elements to be carried forward (session 2.5) Conclusions

Helsinki

23-24 September 2019

Unit B4 Exposure and Supply Chain

1. Slido poll on core guiding principles (see separate document)
2. Flash report from break-out sessions
3. Impact on proposed building blocks
4. Conclusions/next steps

Flash report on break out sessions

Note: This flash report summarises key points from the workshop.

A workshop report will be prepared and published shortly on the REACH Review page at:

https://echa.europa.eu/reach-review-action-3

The report will include a more in-depth overview on the outcomes of the breakout groups.

Safety data for chemicals - user needs

- Broad support for the three user audience categories*.
- Need to further characterise user audience 2 (e.g. Is it a sub-compartment of 1? A niche scenario or mainstream?) and user audience 3.
- Codes (PROC/SWED/SUMI) not needed for end-users; descriptions needed. Codes needed for formulator's processing tasks.
- Need for more visual representation of RMMs e.g. pictograms or even video material.
- Work needed on 'steps per role' and terminology.

- See pre-reading document on user needs (https://echa.europa.eu/-/workshop-on-the-workability-and-quality-of-safety-data-sheets); (1/2) Companies with full capacity to carry out quantitative workplace risk assessment (audience 2 with more emphasis on qualitative methods so far); (3) Companies with no capacity to carry out own workplace risk assessment, and therefore in particular may benefit from exposure scenarios based on supplier's risk assessment.

Methods for generating SDS for mixtures

- Importance of use map availability and registrants' updates.
- More emphasis needed on approach to take when no tools exist (e.g. how to deal with absence of use maps).
- Tools will need to be maintained in an holistic manner (e.g. use maps, phrase libraries).
- Communication and raining are essential; further material needed to communicate workflow schema to wider audience.

- Need to reflect more on change management (e.g. variations in use and in 'recipes' over time)
- Need to reflect further on distributor's role, and mixtures in mixtures.
- Rationale/decision tree required for selecting appropriate method e.g. SUMI/LCID/Generic ES.

Minimum requirements for ES

- YES they are needed: identifiers for uses and tasks/activities; exposure determinants to be addressed; values/phrases to express the safe use advice;
- Discussion/debate how to implement/maintain and whether this is for legislation or guidance.
- How to deal with mandatory information that is not applicable/relevant for a certain case?
- Format/XML – clear alignment needed for automatable processing (i.e. for the system to work). Discussion needed on SME users working on paper and MSCAs who require paper format (solutions needed).
- Reflect further on minimum requirements per supply chain recipient (formulator, end user group, ES for substances vs SUMI for mixtures).

SDS authoring short/long term

- Clarify the big picture for everyone (acceptance by authorities, stability needed, awareness and training).
- Suite of tools working together, exchange, SDS providers also working together.
- Focus for tool development different from different breakout groups:
  - Some want downstream user tools developed.
  - Some want Chesar for mixtures (other authoring tool)
  - Some to focus on ESCom/XML.
  - Logical to start top-down. Approach needed.
- Unblocking factor = minimum requirements for ES.

Building blocks towards solution

Impact on system building blocks

- Sector Use maps
  - DU sector maps; SUMI libraries [Broaden availability across the market]
  - Registrant's use maps (GES type) [Consider Adaptation]
- Chesar for registrants; [adapt Chesar for downstream users]
- ESCom [Consider better resourcing]
  - Phrase catalogue; [consider harmonised translations]
  - Xml exchange standard
  - Consider integration with SDScom
- Formulator's tools [workflow, guidance, rules, develop tools, integrate into a tool box]
  - SUMI selection (based on sector use maps)
  - Lead Component Identification (LCID) + "Consolidation" rules for end-use mixtures possible?
  - Exposure estimation and risk characterisation (CSA)
  - Check what is needed in addition for mixture in mixture

Impact on system building blocks

- Make available extended SDS authoring and processing tools (substance SDS and mixture SDS)
- DU conformity check principles at different supply chain levels (e.g. equivalence assessment ES/OSH risk management); feed into tools.

Conclusions

Conclusion/next steps

Conclusion

- **Broad consensus on guiding principles and building blocks.**
- **Need to clarify (stable) vision for future/ideal state (safe use advice, role of each actor to get there).**
- **Business case for investment (securing resource).**

- Further work on terminology, missing elements identified.

Conclusion/next steps

Next steps

- **Feedback questionnaire.**
- **Report from the workshop:**
  - More comprehensive summary/analysis.
  - Outcome of workshop in terms of guiding principles and next steps (building blocks).
  - Your feedback and further ideas will be needed!
- **CARACAL paper**
  - Overall outcome of the two workshops: March, September
  - Areas of consensus where development/investment is needed, vision for future state, ”business case” for investing.
  - (*draft*/*indicative*) work programme?

Thanks!