



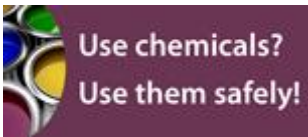
# Duties with regard to exposure scenarios

*Cefic/DUCC workshop on exposure  
scenarios*

*21 October 2011*

*Laura Walin*

*ECHA – Directorate of Registration*

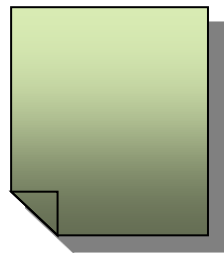


# Communication in the supply chain – key to the success of REACH

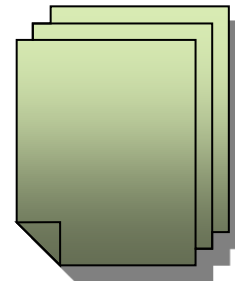


- Over 5000 substances registered – chemical safety information gathered by the registrants
- Next challenge: Pass the information down the supply chain if the substance is classified as hazardous or persistent/bioaccumulative/toxic or is on the candidate list

# Extended SDS - tool for communication

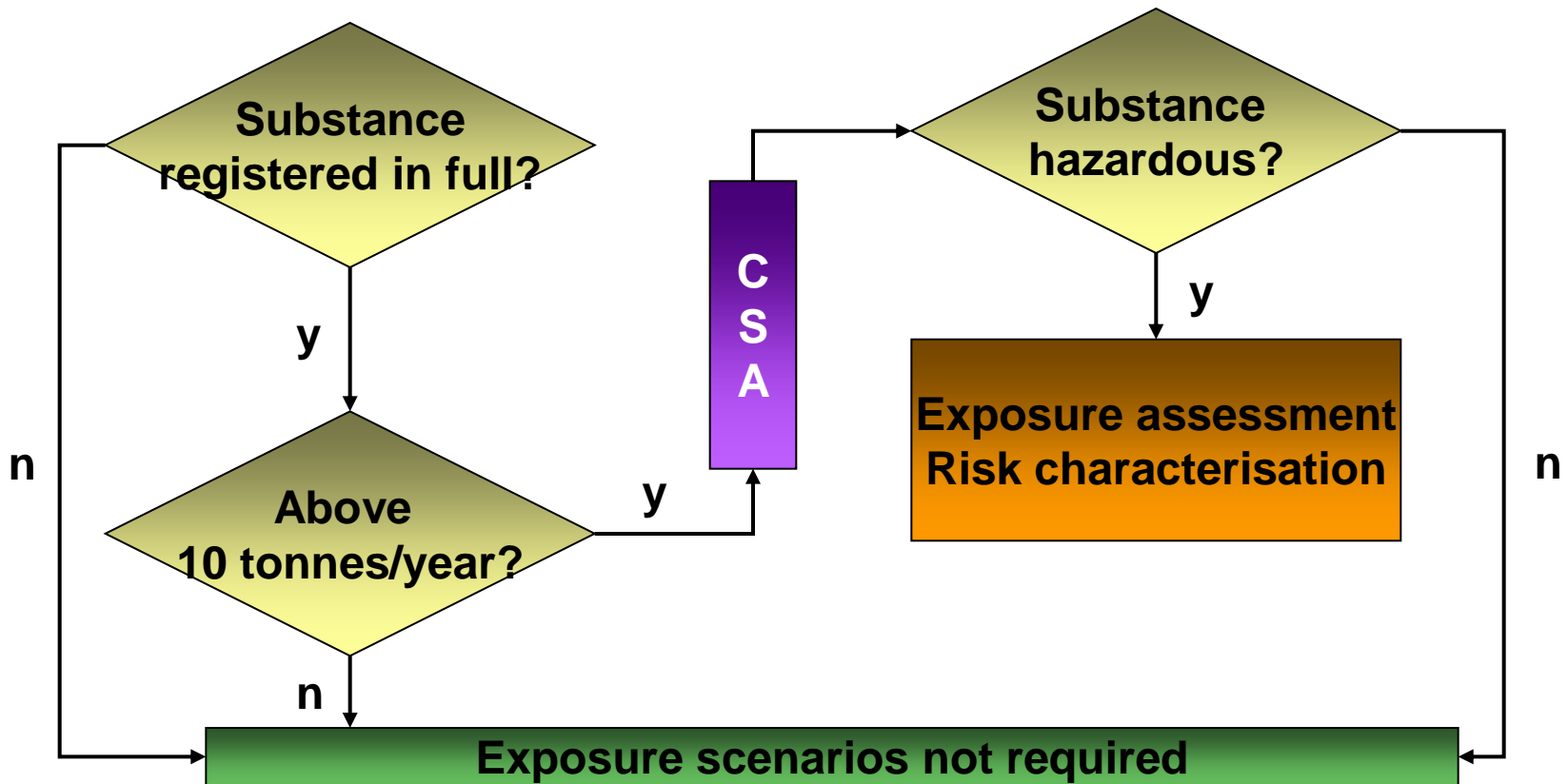


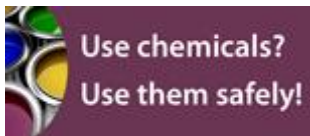
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- Main body
    - Classification and labelling
    - Threshold values for exposure
    - Physicochemical data
    - Toxicological and ecotoxicological data
    - General advice for safe handling
  - Exposure scenarios
    - Use specific operational conditions
    - Use specific risk management measures
-

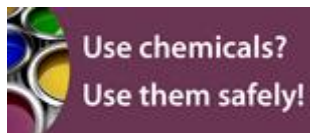
# When to expect an extended safety data sheet?





# Valid reasons for receiving SDS without exposure scenarios

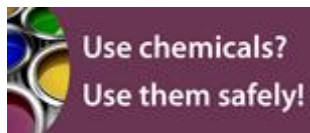
- Substance is exempted from registration
- Substance not registered yet
- Substance is not hazardous
- Substance registered as an intermediate
- Substance registered below 10 tonnes/year
- SDS provided on a voluntary basis



# M/I: Clarity & consistency

## 1. ES 1: Consumer end-use (SU 21); washing and cleaning product

1. Title of Exposure scenario	
PC 35: Washing and cleaning product	
<b>Environment:</b> Component released during end-use	ERC 8a
<b>Consumer</b>	
Use of laundry and dishwashing product	PC 35
Use of trigger spray cleaner products	PC 35
Use of liquid cleaning product for manual surface application	PC 35
Use of abrasive product for manual surface application	PC 35
Use of liquid cleaner for cleaning carpet	PC 35



# M/I: Conditions of safe use

## 2.4 Control of consumers exposure for Use of liquid cleaning product for manual surface application (PC 35)

### Product characteristics

Covers concentration of substance in product up to < 15 %

### Amount used, frequency and duration of use/exposure

For each use event, covers use amount up to 250 grams

Covers dilution in water greater then 20 times

Covers daily use

Covers duration of application up to 30 minutes

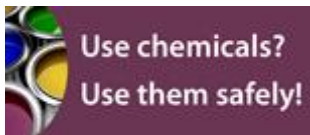
### Other operational conditions affecting consumers exposure

Covers hands and forearms exposed

Covers use in Living room under typical ventilation and residence time

Covers an application area up to 22 m<sup>2</sup>

Covers cleaning solution amount per event up to 880 grams

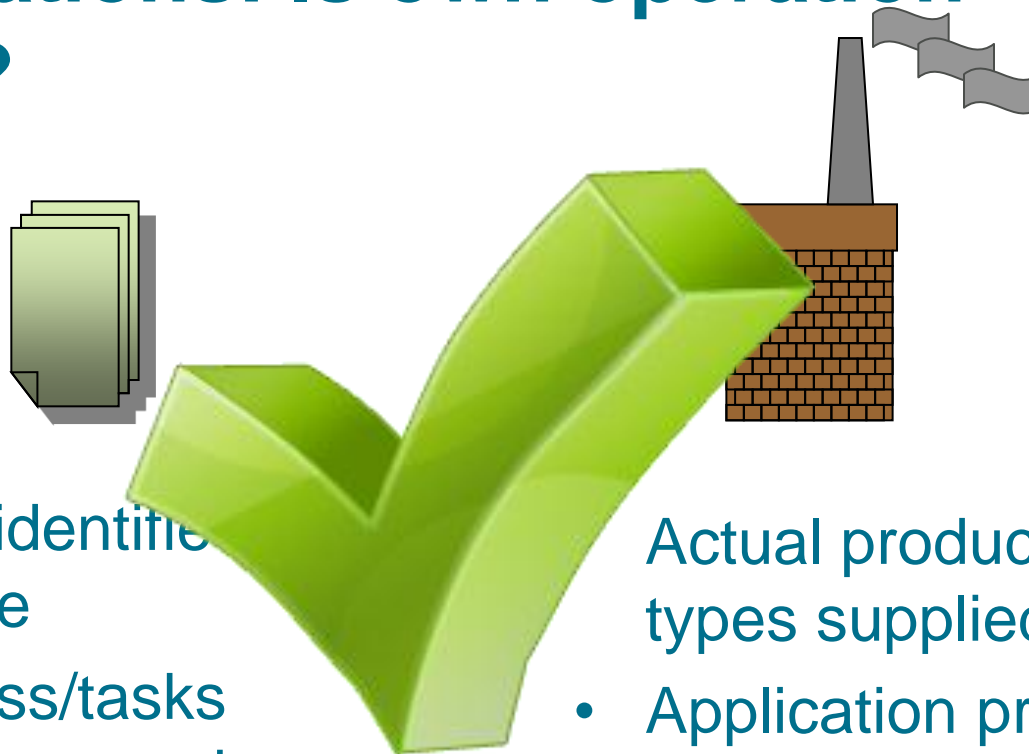


# M/I: Exposure estimates and RCRs

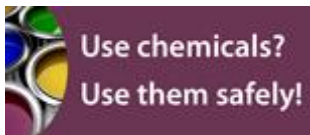
Consumer exposure					
Long-term, systemic					
Contributing scenario	Inhalation	Dermal	Oral	Combined routes	Exposure estimation Method
Use of laundry and dishwashing product (PC 35)	Exposure: 15.6 mg/m <sup>3</sup> RCR: 0.137	Exposure: 21.4 mg/kg bw/day RCR: 0.104	Exposure: 0 mg/kg bw/day RCR: 0	RCR: 0.241	Inhal: External exposure estimation tool - ECETOC TRA  Derm: External exposure estimation tool - ECETOC TRA  Oral: External exposure estimation tool - ECETOC TRA



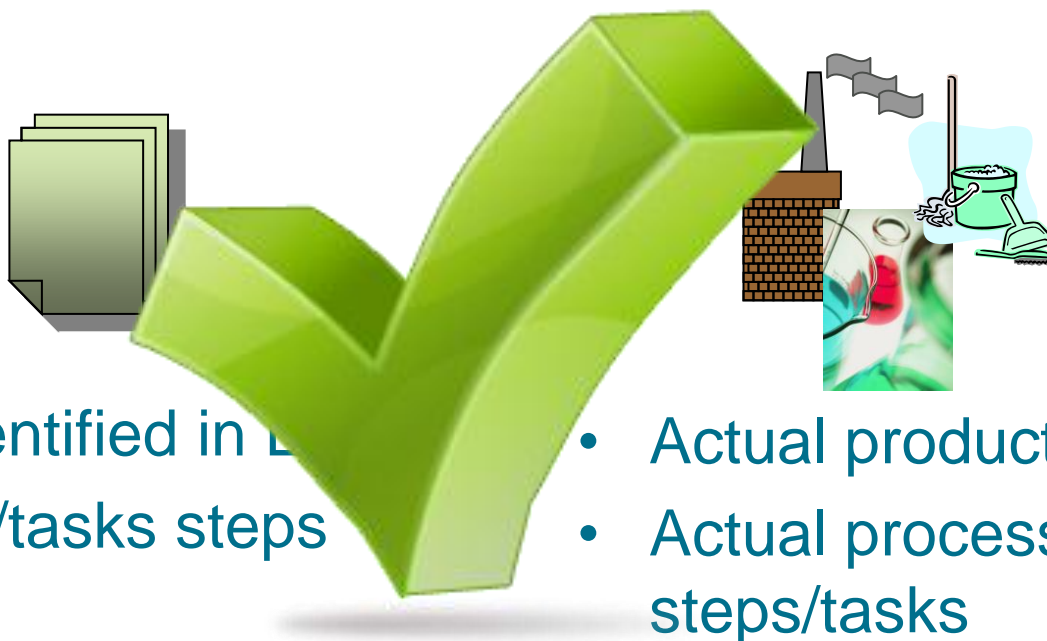
# DU obligations: Is own operation covered?



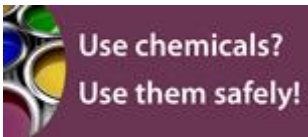
- Uses identified ES title
- Process/tasks steps covered
- Conditions of safe use described
- Actual product types supplied
- Application process foreseen
- Foreseeable conditions of use



# DU obligations: Are the foreseeable uses further down the supply chain covered ?

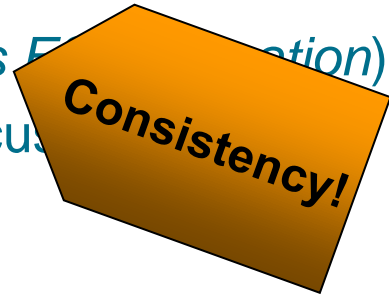


- Uses identified in L
- Process/tasks steps covered
- Conditions of safe use described
- Actual product category
- Actual process steps/tasks
- Actual conditions of use

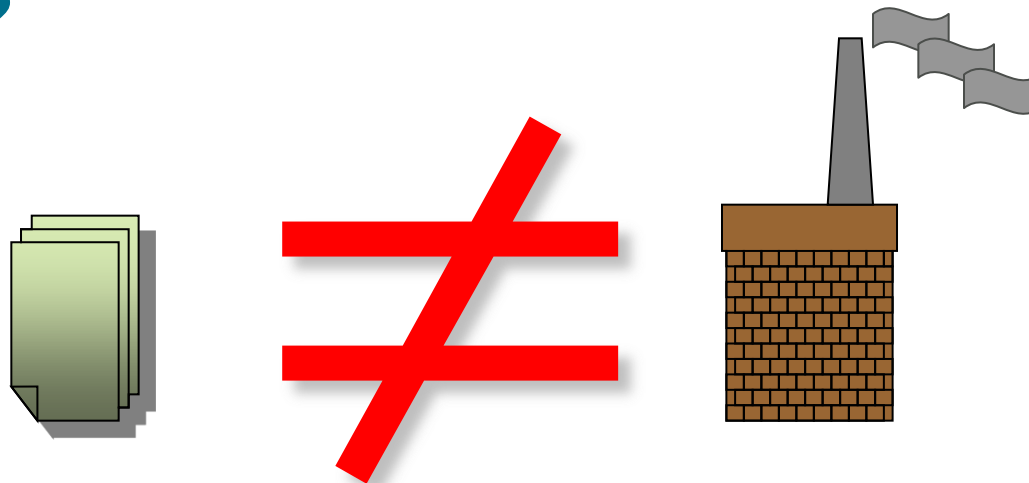


# DU obligations: Implementing and communicating safety information

- Implement the measures communicated in the extended safety data sheet in own operations
- Evaluate whether the own product design and foreseeable conditions of use are covered in the set of ES received
- Forward safety information in the ESs to own customers
  - Include in the main body of the SDS; (*flag as F*...*ation*)
  - Include in the ES generated by DU for own customers
  - Forward ES as received by DU

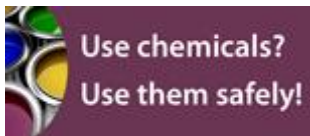


# DU obligations: Is own operation covered?



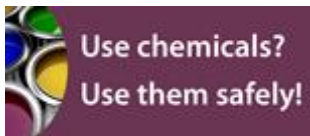
- Uses assessed
- Process steps assessed
- Conditions of safe use

- Actual use
- Actual process steps
- Actual conditions of use



# DU options if own use/conditions of use are not covered

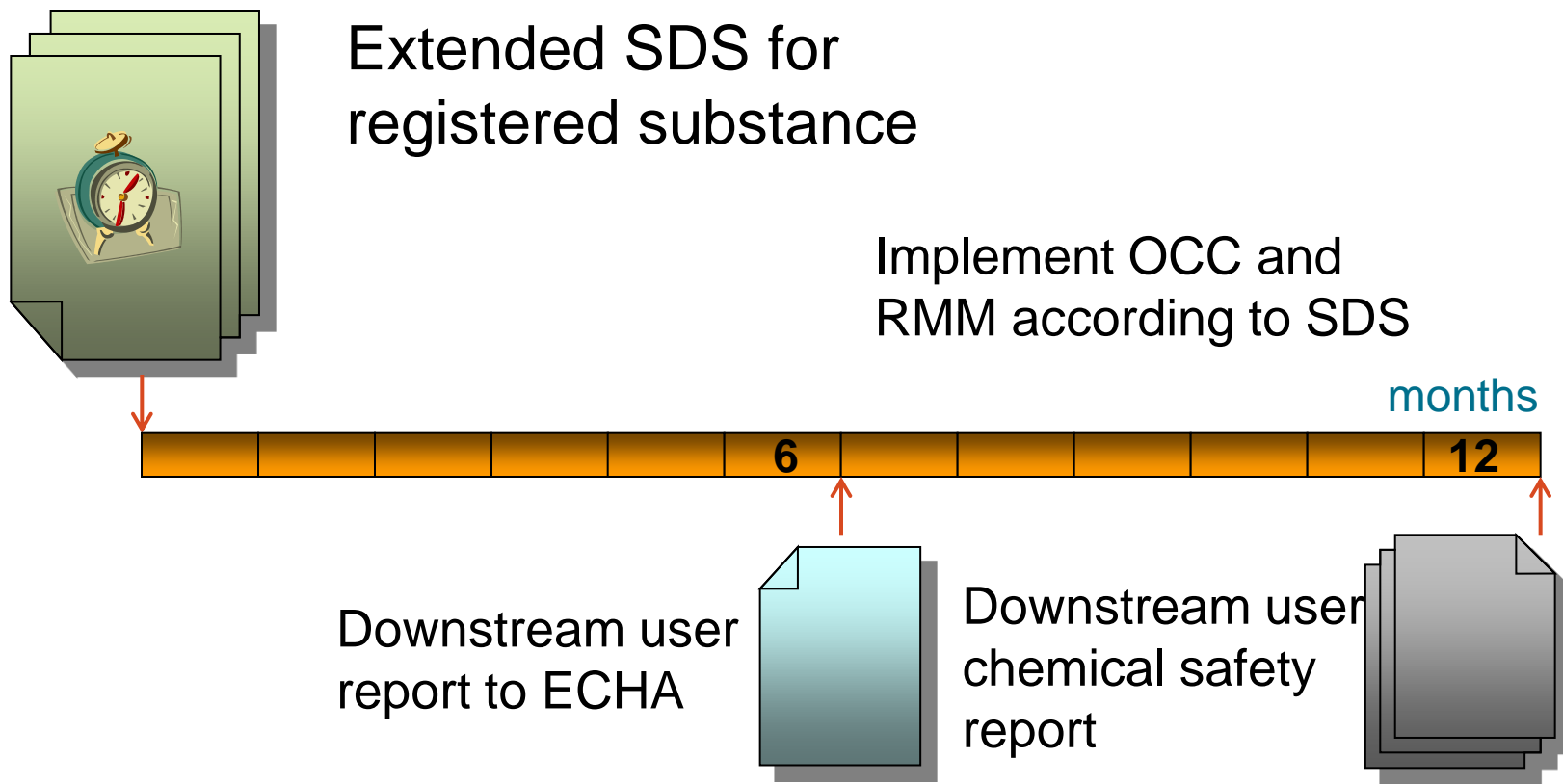
- Ask your supplier to include your uses in his chemical safety report and to make available a revised exposure scenario
- Adapt your activity and/or products to the conditions of safe use described in the exposure scenarios
- Look for another supplier whose exposure scenarios cover your uses
- Carry out your own chemical safety assessment for your specific use/conditions of use or
- Stop that activity

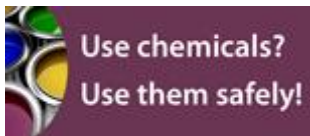


# DU report on missing/unsupported use to ECHA according to Article 38

- Administrative information
  - Your identity
  - Your suppliers identity
  - Registration number(s)
- Substance identity
- Brief description of your use
- Brief description of the conditions of uses
- If necessary, proposal for testing on vertebrate animals
- **Different from DU chemical safety report!**

# Relevant timelines for DUs

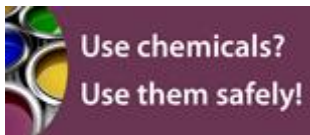




# Key messages

- Manufacturer/importer
  - Communicate uses assessed to be safe
  - Communicate conditions of use assessed to be safe
  - Enable single DU to identify relevant information in the set of communicated exposure scenarios
- Formulators to compare the ES they receive with
  - their own activities
  - the type and design of their products and
  - the related foreseeable conditions of use
  - Engage in dialogue with supplier if needed
- ECHA uses DU reports to identify
  - issues related to supply chain communication
  - where DUs hold CSA information not covered in the registrants' CSR





# Thank you for your attention!

