



Downstream Users of Chemicals Co-ordination group

# Dossier and Exposure Scenario Quality

## *DUCG viewpoint*

**Sylvie LEMOINE (A.I.S.E. / DUCG chair)**

Cefic REACH Information and Experience Exchange Forum

18 December 2013





Downstream Users of Chemicals Co-ordination group

# Safe use of chemicals: it all starts with good and realistic CSR for substances

- Exposure scenarios: linked to CSR (= black box to DU)
- Learning-by-doing, still now ! The task remains enormous
  - 2010 'output' chaotic: some improvement is already visible
  - 2013 extended-SDS : quality improvement? Too early to say
- Exposure Scenario for communication
  - **Harmonising content + format of ES**
  - **Realistic exposure assessment / RMM**
- DU have little margin to maneuver to make up for low quality ES
- DUCG strongly supports the ES/CSR Roadmap

 Exposure Scenarios contain many binding parameters / RMM requirements. We need to work together to get them right !



Downstream Users of Chemicals Co-ordination group

# M/I expected to take into account DU data/input

- A DU having reported use information expects it to be
  - used in the CSR
  - documented to him via the Extended SDS



How can we improve this dynamic?



Downstream Users of Chemicals Co-ordination group

# DU can and should actively contribute to realistic exposure assessment

- **Use mappings:** prepare for 2018 + CSR dossier updates
  - Description of uses at sector level
  - Typical RMM / use conditions to be listed to the extent possible
- **Realistic exposure parameters, e.g.**
  - Environmental release factors: SPERCs
  - Consumer habits: SCEDs
- **Timely involvement of DU in substance evaluation:** use information, exposure data



We need to improve sharing of information and supply chain communication mechanisms

# 'Repair' mechanisms for DU are limited and far from being the solution

- **Enquiries on missing uses:** M/I response is slow in general
- **Scaling:** ECHA Guidance for DU will limit possibilities to scale
  - RCR of supplier cannot be exceeded
  - Scale only according to MI instructions, cannot communicate 2 RCRs (typical and max) in the same ES
  - **DUCC welcomes Cefic's ES 'conformity' tool, but this is unlikely to be enough**
- **DU CSR:** interesting option if kept easy? To be further explored
  - Provided substance data are available (SDS limitations)
  - Need to annex ES of substances to mixture SDS
  - Requires expertise at DU level



**There is no such thing like one single representative DU for each use !**



Downstream Users of Chemicals Co-ordination group

# Increase M/I – DU trust: we are in the same boat

- We have a shared responsibility for safe use of substances
- We all need to develop common understanding of REACH requirements related to ES: this is not easy !
- We need to be open to changes since this is 'learning-by-doing': we see progress already!
- We need more points of reference and standards: ENES + CSR/ES Roadmap





FROM

...

TO

...

