



Downstream Users of Chemicals Co-ordination group



BDI

Bundesverband der
Deutschen Industrie e.V.



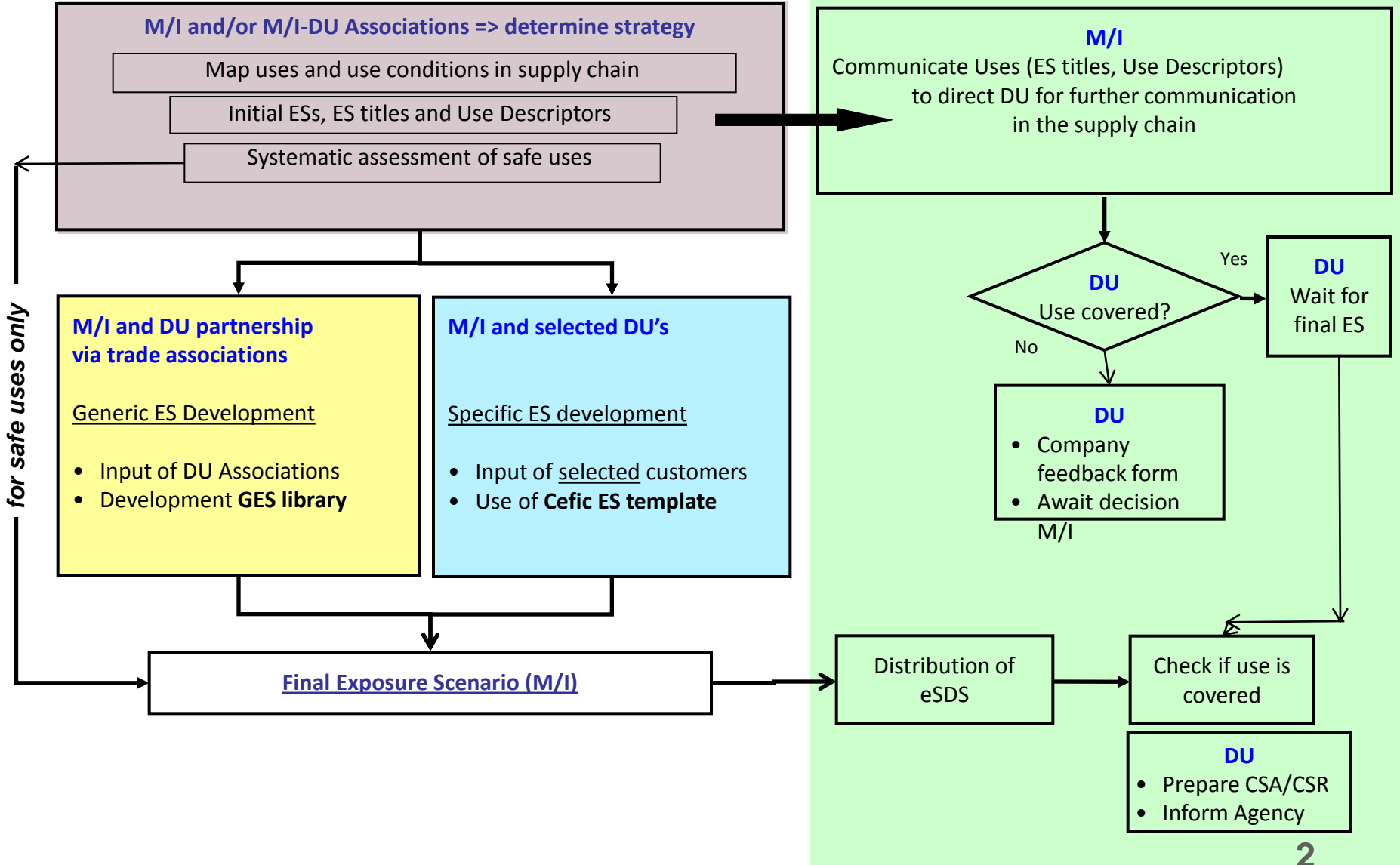
Improving ES communication: (IT) Tools and Scaling

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12/13/2011

REACH Implementation Workshop X

ES Development & Communication model



Available tools on Cefic web



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- **Newsletter: guidance on Use and ES development and Supply Chain Communication**
- **VCI Practical Guide on Exposure Assessment and Communication in the Supply Chains**
- **Libraries use mappings**

Preparation phase

- **Use communication holding letter***
- **UseR template**

• **Guidance on GES process + templates**

• **Guidance on SES process + templates**

SpERCs

ESCom phrases

Use and ES communication

- **IT tool requirements**

**ES for preparations, DPD+
ESCom XML**

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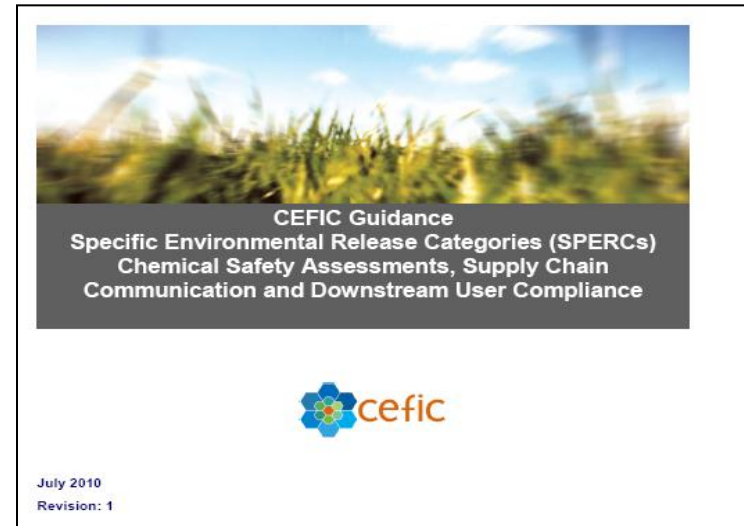
* **Currently under review**

for safe uses only

SpERCs

- standardized **refinements** of the ERC-based emission estimation.
 - Needed to come to more realistic assessments.
- define **realistic default values** (based on good practice information supplied by sector groups, trade associations).
- are **documented** in **SPERC fact sheets**, deposited in ES library.

- **More than 170 SPERCs** are available for the time being
- SPERCs have been **extensively used** for generating the dossiers of the 2010 REACH registrations
- All published on the Cefic web site



Further development of SpERC's

- **Refinement of the fact sheets**
 - SPERC coverage
 - Representation of RMMs in SpERC release factors
 - Documentation of rationale for choice of release factors
 - Define relationship between operational conditions, risk management and release factors
- Making SPERCs available to the stakeholders
- Harmonized and structured format
- Guidance on derivation of SPERCs
- Promote efficient generation, processing and transfer of SPERC information in/between IT applications, e.g. CHESAR

EsCom: Exposure Scenario Communication Package

- **Goal: Harmonised IT standard for ES communication between companies IT systems in the supply chain.**
- **The EsCom package consists of:**
- **ESCom XML 1.1 – The Container for ES Info**
 - XML Schema-definition
 - ESCom XML guidance document
 - Technical documentation
 - Example of an XML-File
- **ESCom Standard-Phrases - The Content for ES Info**
 - Master-File with standard-phrases (incl. phrase-codes)
 - Guidance document for phrase development
- **900 downloads so far, available for free.**

EsCom - Status and Outlook

- **ESCom XML to be aligned with CHESAR**
- **ESCom phrases – to be used in CHESAR**
 - Improvements underway (addition of metadata, elimination of inconsistencies and duplicats).
- **ESCom - applicable for downstream communication of ES over the whole supply chain of the SDS.**
- **ESCom is aligned with BDI EuPraC phrase system for SDS by using the same phrase code system.**
- **Will take some time to implement in the supply chain and to have all IT systems upgraded.**

ECHA – Industry Cooperation

- **Make industry Developments/Tools available in / for CHESAR**

- GES
- SPERCs
- ESCOM phrases
- ESCOM XML – aligning with CHESAR XML

CEFIC-DUCC
Coordination

- ECETOC TRA



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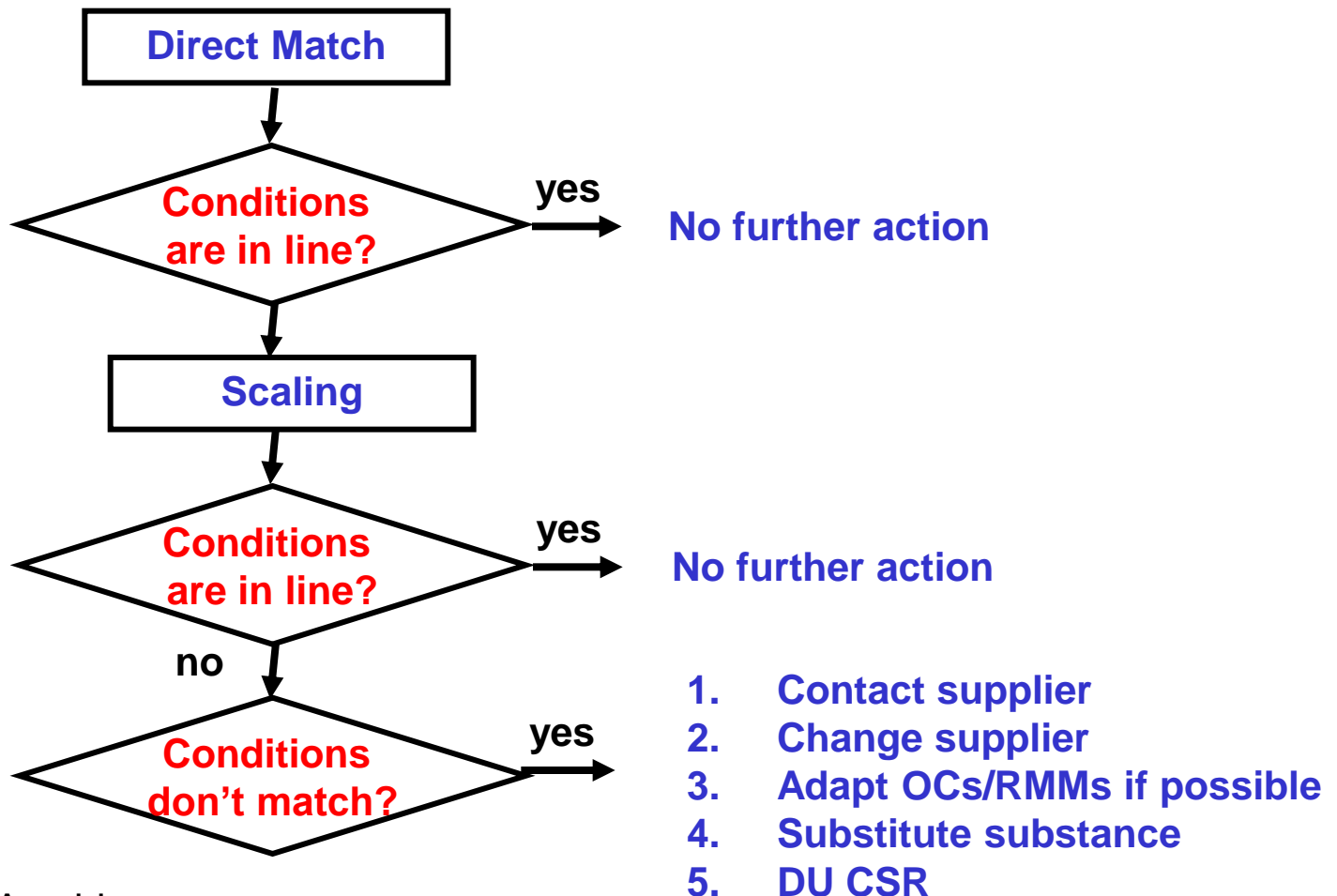


Scaling – An Overview

- **REACH Art. 37.5: DUs have to identify and to conform to relevant information in the ES communicated to them.**
- **ECHA: *„Scaling“ is one method based on which a Downstream User (DU) can determine whether he works within the boundaries of an Exposure Scenario (ES) communicated to him.***
- **„Scaling“ as such is not foreseen in the legal text.**
- **ECHA „Practical Guide for Downstream Users“ – discusses scaling – scheduled for March 2012.**
- **Discussion between ECHA and industry is ongoing.**

When to apply ,Scaling‘*

Comparison: OCs/RMM – actual vs SDS



* Logic of draft ECHA guidance

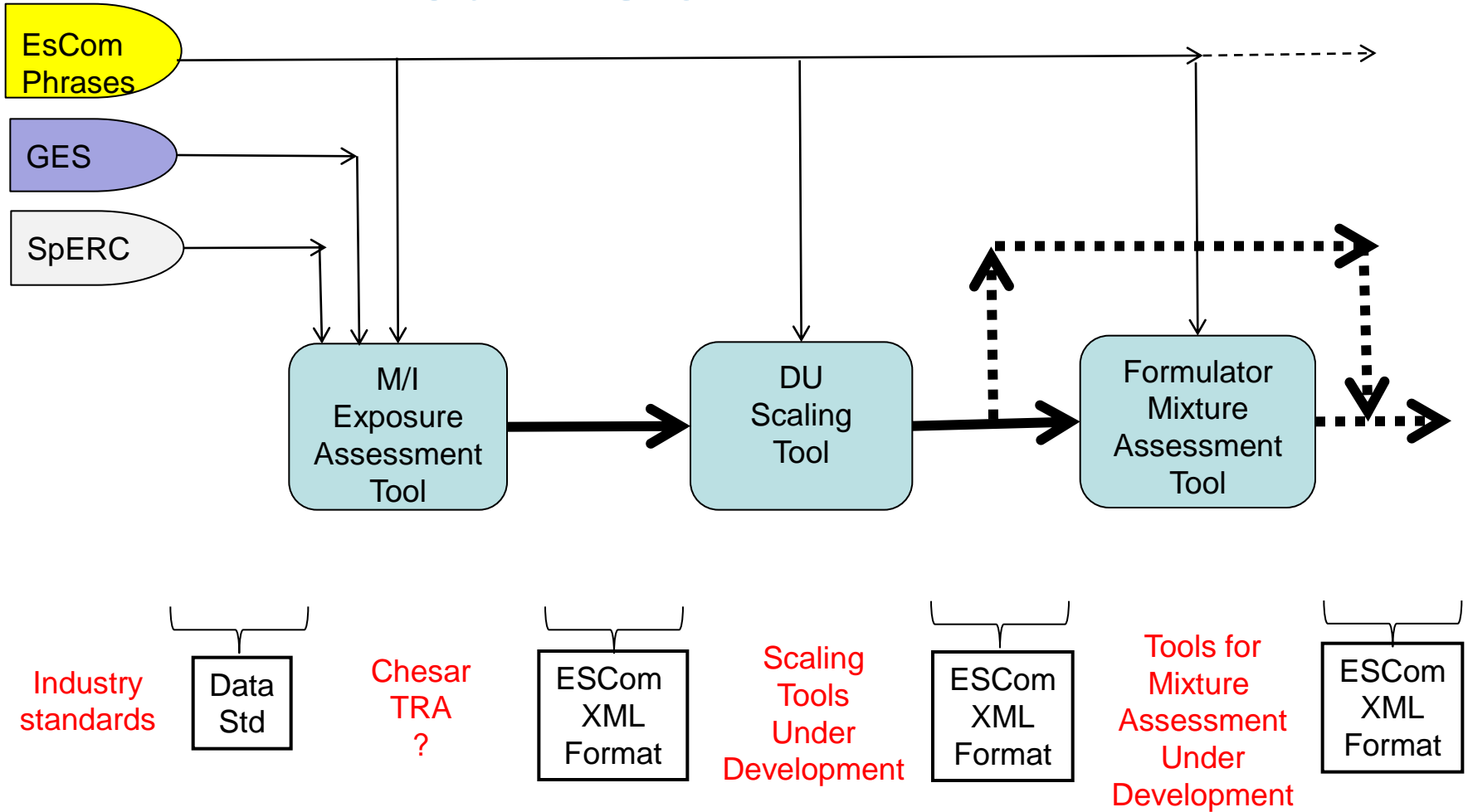
State of the Scaling Discussion with ECHA

- **There is agreement on the following**
 - Only quantitative Exposure Scenarios can be scaled.
 - Scaling is tool-specific.
 - Scaling is restricted to determinants in the ES.
- **Further discussion is needed**
 - How to ensure that scaling does not “invalidate” the Chemical Safety Reports?
 - Can a line be drawn between ‘scaling’ and ‘Downstream User CSA’.
 - Discussions will take place early in 2012 – will be limited to tier-1 type assessments.

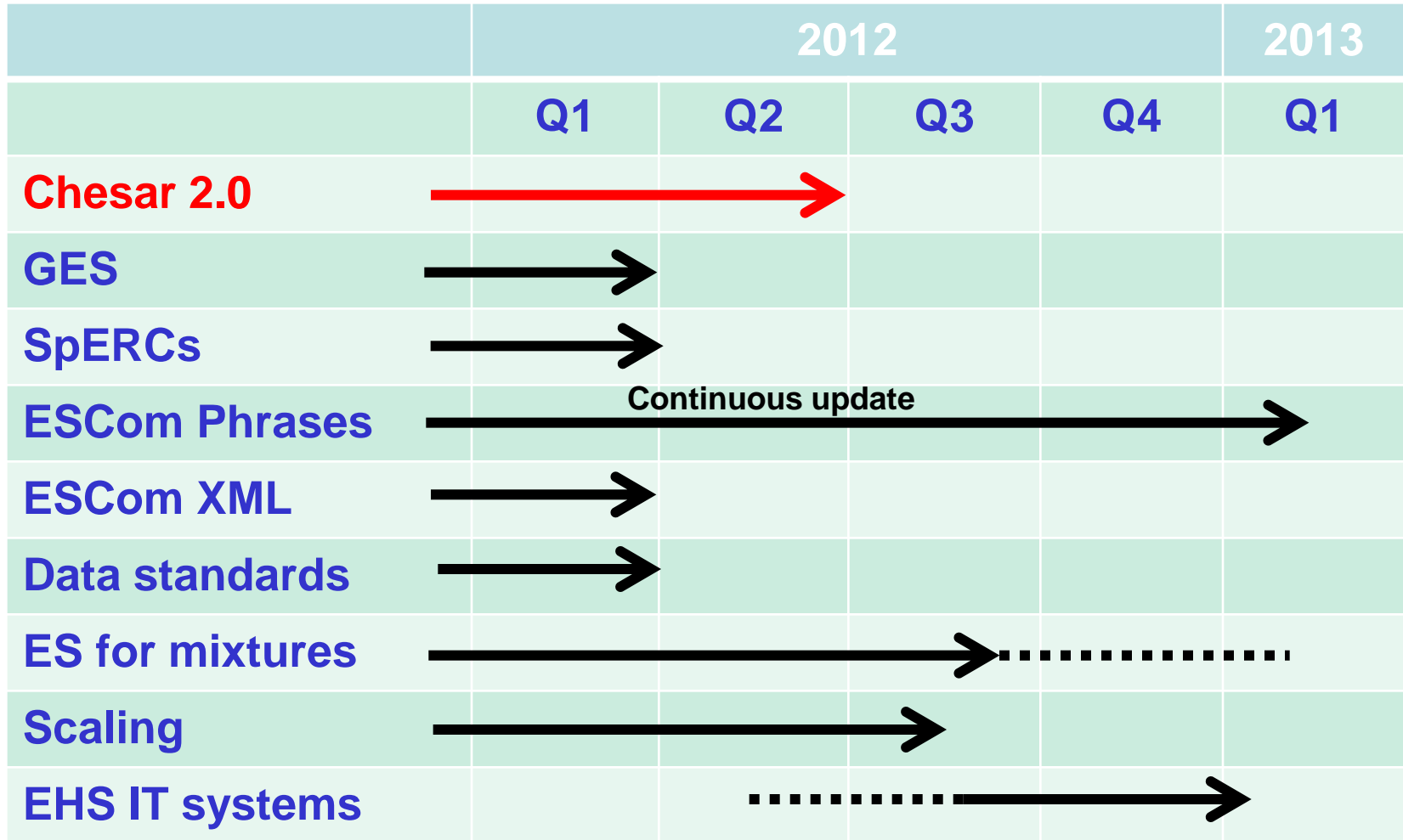
Scaling vs Downstream User Chemical Safety Assessment

- **Scaling vs DU Chemical Safety Assessment (DU CSA)**
 - Scaling - no notification to ECHA
 - DU CSA – notification to ECHA via REACH IT (REACH Art. 37.4), communication to Downstream Users.
 - Legally speaking, there is a significant difference.
- **Technically speaking, there is little if any difference between ‚Scaling‘ and an exposure assessment.**
- **‚Scaling‘ vs. DU CSA: DUs have to avoid that they unintentionally drift from– A boarder needs to be defined.**

Our vision



Timeline



•The given timelines are indicative and depend on voluntary contributions of company experts

Summary and conclusions

- **There are major contributions from industry to set up the ES development and communication process**
- **We are not there yet**
 - Harmonisation and standardisation is key
 - Exposure Scenario information for mixtures
 - Scaling tools
 - Further development of ESCom and harmonisation with assessment tools like Chesar
 - Define standards for industry tools to apply them in IT systems



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Links to the DUGG member associations' websites posting use and exposure information:

Cosmetics	http://www.colipa.eu/safety-a-science-colipa-the-european-cosmetic-cosmetics-association/reach-and-chemicals-/use-and-exposure-information-.html
Detergents and cleaning products	http://www.aise.eu/reach/?page=exposureass_sub2
Paint, printing ink and artists' colours	http://www.cepe.org/EPUB/easnet.dll/ExecReq/Page?eas:template_im=100087&eas:dat_im=101AED
Construction chemicals	http://info.vci.de/user_cc/default.aspx
Photographic materials and imaging	http://www.ip-europe.com/reach-use-descriptors-in-the-imaging-and-printing-industry-for-download
Chemical distributors	http://www.fecc.org/fecc/activities/safety-health-a-environment-she/171-mapping-of-uses-of-the-chemical-distribution-sector
Adhesives and sealants	http://www.feica.eu/library/industry-guidelines/reach

Additional, useful links

- **CSA/CSR/ES tools:**
- <http://www.cefic.org/Industry-support/Implementing-reach/Guidances-and-Tools1/>
- **Use libraries:**
- <http://www.cefic.org/Industry-support/Implementing-reach/Libraries/>
(includes all links from the previous slide and more)
- **ESCom package:**
- <http://www.cefic.org/Industry-support/Implementing-reach/IT-Tools/>
- **DUCC UseR Format for Use Reporting**
- http://www.duccplatform.org/activities/use_and_exposure_info.htm

Thank You!

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