



DUCC



Downstream Users of Chemicals Co-ordination group

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Association Internationale de la Savonnerie, de la Détergence et des Produits d'Entretien
International Association for Soaps, Detergents and Maintenance Products

DU obligations

Perspective from formulators for taking up the challenge

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In a nutshell:

Downstream Users do not have the responsibility for registrations and in the vast majority of cases do not have access to SIEFs

BUT

They have to manage the consequences if substances that they use are not registered on time or not registered for their use



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Particular issues for DU -

1. Substance availability

- DU's access to information regarding the registration status of a substance
 - ✓ Supply chain communication: difficult for DU to know whether a specific substance has been registered (or should have been)
 - ✓ No reason to panic at this stage
- Substance 'vulnerability' will be higher in 2013 and 2018
- **Learnings:**
 - **ECHA's list of substances intended to be registered (2010) was very helpful → please do it again for 2013 substances**
 - **M/I: please tell us in advance if you have no intent to register or register as intermediate only → DUs need time to assess their options**



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Particular issues for DU -

2. Changes to substance hazard profile

- Changes to substance name and profile → increased complexity
- New data → new classifications?
- Divergences in the C&L inventory → confusion?
 - Most critical: new CMR classification
- More severe classifications under CLP → more mixtures classified

- **Downstream impact of classification changes**
 - Legislation: sector legislation, Ecolabel, Seveso, Transport, etc.
 - Indirect but significant pressure: retailers, shelf restrictions, claims/advertising restrictions

- **M/I: please communicate new (more severe) classifications as early as possible → DU to assess severity of downstream impact**



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DU obligations (in relation to ES)

→ *Receipt extended-SDS from supplier*

Check uses are covered (own and downstream)

Checking on Level 1: (ES titles, use descriptors,
main exposure determinants)

Checking on Level 2: OC & RMM focus (e.g.
recalculate RCR via scaling)

**Implement conditions of safe use / ensure safe
conditions of use / find way to cover missing uses**

Assess your options carefully

**Forward relevant information from ES downstream
(via mixture SDS)**

Identification of lead substances (DPD+)

Integrate relevant ES info into mixture SDS

*Note: DPD+ does not
cover all situations*

Other DU obligation: report new hazard information to supplier or report if RMM is not appropriate



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Particular issues for DU - Uses and Exposure Scenarios

- Existing DU guidance is not practical enough for DUs
- Lack of standard format for ES communicated in SDS annex is problematic, more than size
 - Note: table of annex content is very helpful
- The 12-month deadline for complying with ES recommendations (6 months for DU CSA) is extremely challenging
- Supply chain communication is expected to remain chaotic
- Handling SDS annexes for mixtures requires careful assessment and new tools
- Language/translation issues
 - EN in addition to local language is desired



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Particular issues for DU - ES format

- Lack of harmonised ES format is a serious hurdle to DU
 - Chesar 1.2 to contribute to setting a standard?
 - ES exemplification (ECHA)
 - DUEG workshop on current 'best practices' from real-life ES
- M/I sending of extended-SDS: good data, not too late
 - Not too soon: complete, well-structured, understandable SDS annexes ease the DU task
 - Provided no new hazard/risk was found as a result of REACH
 - Not too late: as DU have to prepare SDS of mixtures

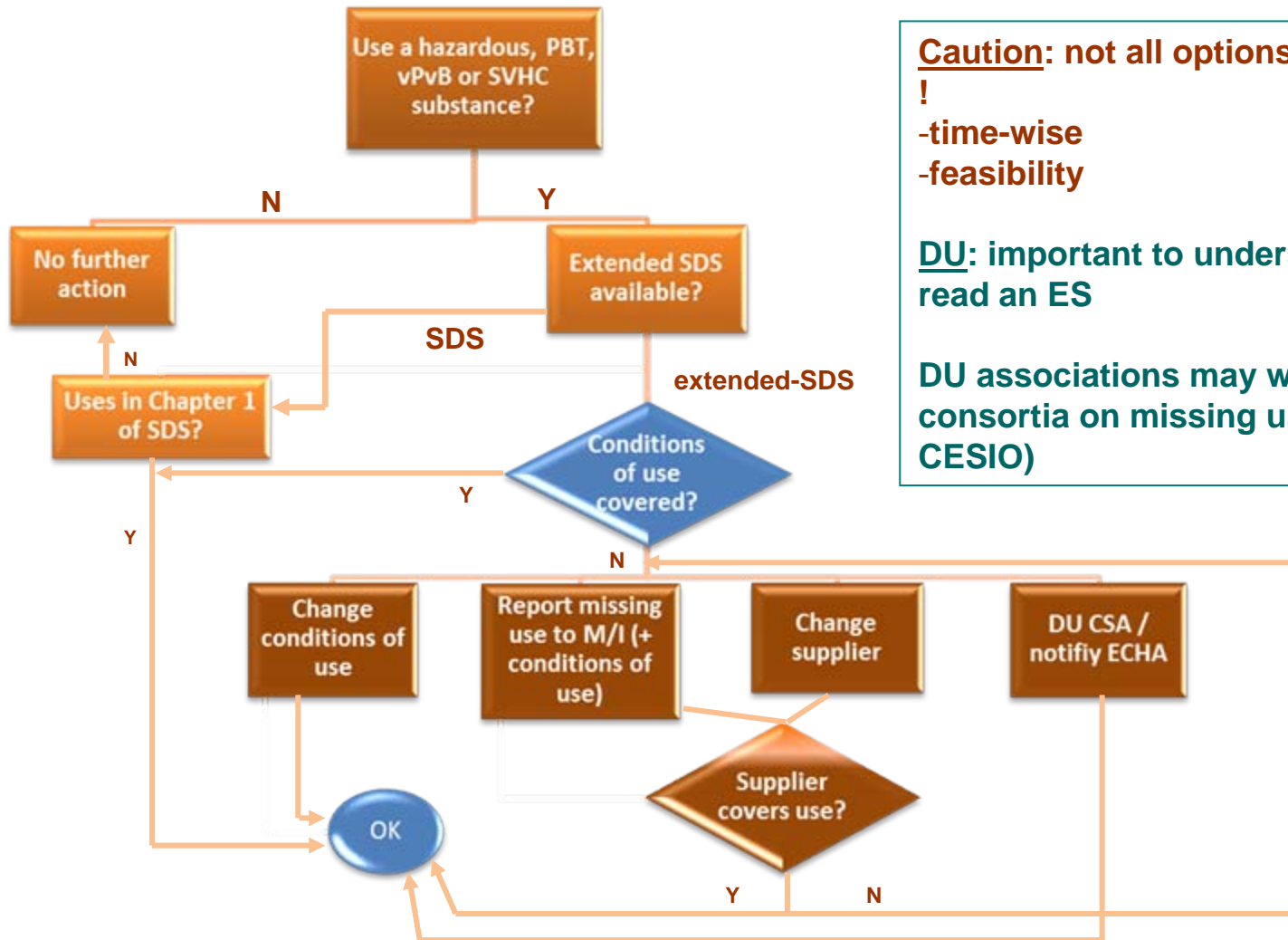


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Are my uses covered? Options for DU



Caution: not all options are equivalent !

- time-wise
- feasibility

DU: important to understand how to read an ES

DU associations may work with consortia on missing uses (e.g. CESIO)

Revisit options



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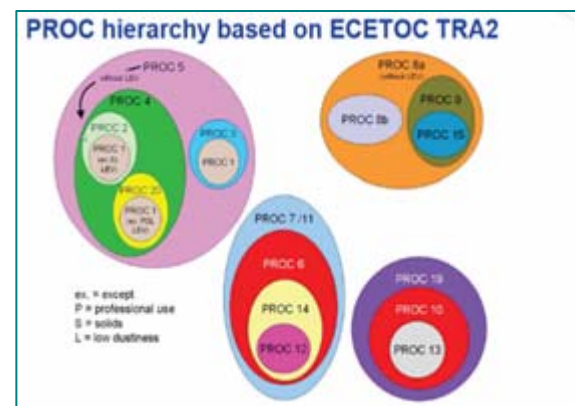


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Are my uses covered? On-going activities

1. Practical Guidance for DU on how to check a use is covered ('level 1'): Cefic/DUCC/FECC
 - Checklist: titles, use descriptors
 - OC / RMM (environment/human health)

	UD/ES title OK	UD/ES title not OK
Use within OC/RMM	Use covered	Use covered
Use outside OC/RMM	Use not yet covered -Scaling -Change OC/RMM (M/I or DU level) -DU CSA	Use not covered -Report to supplier -DU CSA -Other supplier



2. Practical Guidance on scaling for checking whether a use is covered ('level 2'): Industry and ECHA
3. Practical Guidance on DU CSA: a possibly attractive option for DU in certain cases



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Particular issues for DU -

5. SDS of mixtures

- **Mixture SDS: a considerable challenge**
 - Deadlines (need all ES of substances)
 - New format: Annex II of REACH
 - Identification of 'relevant' information from incoming substance ES
 - Annex or no annex?
 - Adaptation of IT systems
 - Technically difficult: expertise needed
 - Mixtures of mixtures?
- **Experience and expertise lacking**
- **DUs need time to adapt**



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On-going activities: ESCom XML Standard Background

- Formulators typically handle hundreds of raw materials
- They will receive hundreds of extended SDS providing Exposure Scenario information
- Information is extensive and consists of > 50 information items per ES



**Routine processing of ES is not feasible
without system support**



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On-going activities: ESCom XML Standard Project scope

- Substance manufacturers, formulators and IT providers collaborate to:
 - Develop a data exchange standard for Exposure Scenario communication in the supply chain (XML)
 - Develop standard phrases as a standard representation of Exposure Scenario information
- **Objective: the content of an ES is transferred electronically via IT systems using ESCom XML + ESCom phrase library**
- Project participants: DUEG, Cefic, VCI, BDI, IT software providers
- Status: release of ESCom Standard Package on **20 May 2011**
 - Future updates and maintenance to be planned

Companies can help ensure the XML is implemented by working with their SDS IT providers: Harmonisation is possible (now) !



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Ideal ES communication chain

M/I: CHESAR → XML output (ext-SDS)

DU1: ESCom XML 1.1 → XML output (ext-SDS)

DU2 (or n): ESCom XML 1.1 → XML output (ext-SDS)

Note: this 'ideal picture' cannot happen in the short-term. ES are complex, they may be understood differently by different companies

However, **all parties should work towards this common objective**



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On-going activities: ESCom standard package in practice

- The package [ESCom XML 1.1 + ESCom standard phrases (Excel file – EN only) + Guidance] will be made available free of charge from the Cefic website initially
- IT providers have to develop an interface to implement it in individual companies' systems
- The ESCom Standard will probably evolve
- The ESCom Standard will facilitate ES translation



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Conclusions

- DUs have complex and novel tasks under REACH: build expertise (SMEs!)
- DU challenges are numerous: deadlines, options
- **We are only at the beginning of a long process**
- Comprehensive IT support will not be available before 3Q2012 (best case)
 - interim solutions in the meantime
 - focus on priorities
 - pragmatic approach on SDS issues (mixtures)
- Inspectors' expectations (REACH-Enforce-2)??

BUT... WE ARE WORKING ON IT !