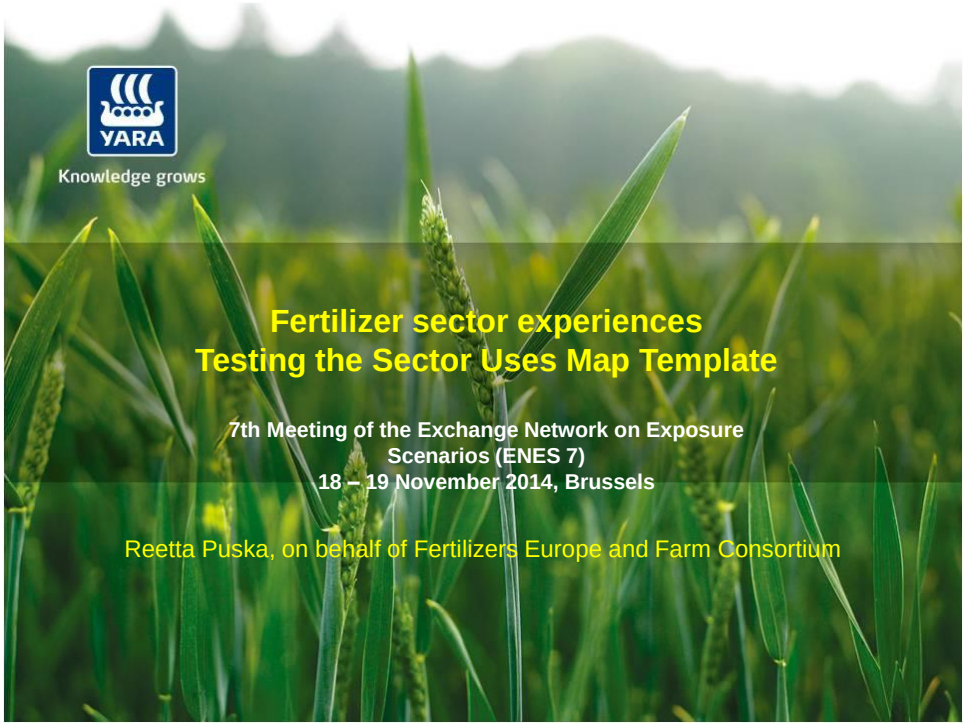

Fertilizer sector testing the Template

- Three fertilizer companies (registrants, DUs) participated, representing Fertilizers Europe and Farm Consortium :
  - Borealis AG : Steffen Pfeiffer & Pauline Hebert
  - ICL Fertilizers : Iris Mor & Inna Shusterman
  - Yara International ASA: Marie Bjørgan & Reetta Puska
- Target 1 was to test the applicability of the Template for our sector
- Target 2 was to start to build up the Fertilizer Uses Map
- Template exercise has been useful: good opportunity to contribute and ask.
- Has also evoked interest in reviewing the uses within our sector.
- This exercise has shown that the understanding on coding rules differ slightly between companies.
- Fertilizer sector will wait until the Template has been finalized and ECHA Guidances published - then the final standard fertilizer sector uses map will be worked out. Publication via Fertilizers Europe and Farm Consortium.

Sector uses maps – all will benefit

Good quality CSA of a use requires that :

- Use is described on a proper and realistic way (PROC, ERC..)
- All have adopted the same practice in assigning the use descriptors
- Realistic consentrations become assessed for each use

Registrants will benefit :

- When preparing the dossier, registrants can consult the maps when coding and assessing the uses, not known profoundly by them
- Will reduce the needs to make updates on uses and exposure assessment in dossiers, triggered by DU requests.

DUs will benefit :

- Will find the correct use descriptor codes in the incoming suppliers eSDSs
- Uses coverage check (own and customer uses) becomes easy.
- Will help in preparing the DU CSR

Finding 1: field 3 does not follow R12 guidance rules 1(2)

- ECHA expected that “use name” is always the same as Exposure scenario name in CSR :

3	Use name	Use name agreed at sector level (unique label characterising the nature and scope of the activities covered (standard phrase in the next version of the ESCom catalogue)	The use name should remain quite generic. Further details can be provided in the brief description of the use process and in the contributing activity / technique names. Remark The 'use name' forms the 'Exposure scenario name' in the CSR. Ideally, use names are defined at sector level (standard phrases in the future)

Use identification and general description								Link activities to exposure assessment inputs				Additional optional information regarding generic composition
Use code	Life Cycle Stage	use name	ES short title for communication	Brief description of use process	Sector of use (SU)	Product categories (PC)	Article categories (AC)	contributing activity type	contributing activity name	Contributing activity descriptor	exposure assessment input code	Generic composition by technical functions; maximum concentration per techical function; technical functions expected to be present in subsequent service-life
1	2	3	4	5	6	7	8	9	10	11	12	13

- R12 Guidance (p.13-14) does not know this rule :

R.12.5.2. Building titles of exposure scenarios

The registrant will give each exposure scenario contained in the CSR and attached to the extended safety data sheet a short title, indicating which uses are covered in the ES. Since exposure scenarios can be broad (covering various uses) or specific (covering only one or few uses), the title of the ES may vary accordingly:

- Different uses (as defined by the registrant) can potentially be addressed in the same exposure scenario, if the same operational conditions and risk management measures apply to all these

Finding 1:
field 3 does not follow R12 guidance rules 2(2)

- We have many substances where one Exposure scenario covers several identified uses. Two examples :

Table 47. Overview on exposure scenarios and corresponding use descriptors

Exposure scenario	Short description of ES	Linked to IU	PC	SU	PROC	AC	ERC
ES1	manufacturing	1	-	8, 9	1, 2, 3, 8a, 8b, 9, 14, 15	-	1
ES2	industrial use including distribution and other activities related to the processes in industrial settings	2, 3, 4, 5, 6, 7, 8, 9	1, 11, 12, 19, 37	3, 10	1, 2, 3, 5, 8a, 8b, 9, 13, 15,	-	2, 6a
ES3	professional end use	2, 3, 4, 5, 6, 10, 11, 12, 13, 14, 15, 16	12	22	1, 2, 8a, 8b, 9, 11, 15, 19	-	8b, 8e
ES4	consumer end use	17, 18, 19	11, 12	21	-	-	8b, 8e, 10a

Table 38. Overview on exposure scenarios and coverage of substance life cycle

Short title	ES No.	Life cycle stages: Manufacture	Identified uses: Formulation	Identified uses: End use	Life cycle stages: Consumer use (mixtures and/or articles)	Life cycle stages: Waste stage	Linked to Identified Use (IU)	Sector of Use (SU)
Manufacture [redacted]	1	x					Not applicable	SU 8, 9
Use in chemical synthesis and in formulation of mixtures and materials	2		x	x			IU 2	SU 3, 4, 8, 9, 10, 20, 22
Use as laboratory agent	3			x			IU 3	SU 3, 22, 24
Industrial and professional end use as additive, pigment, auxiliary in plastics, resins, paints	4			x			IU 4	SU 3, 12, 22
Industrial and professional end use as raw material for	5			x			IU 5, 6, 7, 8	SU 3, 13, 19, 22

-> If ECHA allows one exposure scenario to cover several uses also in future, then Template instructions need to be amended.

Finding 2:
Too much different “names”

- As the previous example showed, it is not easy to see the difference between different “names”
- Which name is related to IUCLID, which name to CSR and which to Exposure Scenario in SDS – to be made clear.

- Would it help if ECHA would create a chart to show the dependencies between the names ?
- Naming rules need to 100% consistent with Guidances and Tools :
  - Sector uses map Template
  - IUCLID
  - Chesar etc.

Finding 3:
Formulation by professionals missing

Fertilizer sector:

- Growers dissolve fertilizer in water and/or mix with pesticides, adjuvants, pH adjusting agents or other fertilizers etc. Indoors and outdoors. Grower may need to store the mixture he has prepared. Also seeds can be treated by fertilizers and stored thereafter.
- Some professionals make dilutions/mixtures and act as contractors: apply the mixture for the crop on behalf of the farmer.
- Professionals may also re-pack fertilizers and sell further.
- To follow pH and nutrient balances growers take samples on their fertilizer liquids. Samples will be analysed by professionals in labs or by the grower himself by using quick tests.

- ERC2 is not allowed for SU22 – what to do ?
  - Stop thinking that professional formulation is a separate use but include it as a preparative step for fertilizer application (ERC8b, ERC8e) ? Where to set the boundaries of a use ?
  - ECHA to make a new ERC ?
  - Fertilizer sector to generate a spERC ?
    ...this we do not want to promote too much because this problem might be relevant for other industry sectors, too