



ENES 7

CONCLUSIONS

CSR/ES Roadmap Coordination Group

19 November 2014

Brussels

General on CSR/ES Roadmap / ENES: 'it's working'

- **Progress is becoming increasingly tangible**
- **The Roadmap is a holistic approach** with many inter-related activities aiming at one goal: safety through the life cycle
- The high level of ambition of the Roadmap is maintained e.g.
 - Use maps
 - Exposure assessment inputs
- **We are learning from experience** (all actors)
- There is more on the horizon
 - Estimated volumes per use
 - IT-tools: IUCLID 6 Template update, Chesar 3
 - PG13 – scaling and new PG on DU CSR
 - Guidance updates !

Use maps improvement: connecting use and exposure assessment

- A new activity, connecting different elements of the CSR/ES Roadmap
- Successful testing of new template confirmed usefulness, e.g. fertilisers supply chain
- Refreshment on Use Description needed (guidance update)
- Next steps:
 - Follow-ups to specific findings
 - Preparation of guidelines (clarify use maps template): 2015
 - Publication
- **Essential because of connections to exposure assessment**
- All actors will benefit from improved use maps: more realistic assessments, provided registrants embrace it

Exposure assessment: further refining

- SCEDs, SpERCs well advanced
- Workers 'analog' initiated: need to connect with other Roadmap activities
- SpERCs: concept well established, documentation is essential, requires more alignment/consistency
 - ECHA project on SpERCs due December 2014
 - Follow-up to be organised
- IT compatibility should be borne in mind

IT developments: towards harmonised ES communication

- ESCOM Package: **ESCOM 2.0 due Spring 2015**
 - ESCOM Catalogue of Standard Phrases: Further improving
 - Mapping of phrases and XML almost completed
 - New criteria and procedure for phrases submission
 - ESCOM XML schema: difficulties addressed
- Panel discussion:
 - **ESCOM requires 'marketing'**, trust building and a business case: ESCOM saves costs medium-term and improves ES quality
 - All parties see some value in implementing ESCOM, pilot desirable as a selling point
- **Structured Short Titles: ready for implementation**
 - Rules, principles completed
 - Minor amendments can be made post-Guidance update (use descriptors)
 - Feedback on 3rd Identifier is welcome

Mixtures: Safe use information in SDS for safety in the supply chain

- **Top-down and bottom-up are complementary but apply to different situations (today)**
 - generic vs sector
 - start from substances (consolidation based on lead components) vs start from mixture (ready-to-use sheets)
- **Top-Down: Cefic/VCI Lead Component Identification Methodology** following a logical and scientific step-by-step workflow and allowing (some degree of) automation
 - Applies to most mixtures, all aspects considered
 - Based on CLP classification mixture and substance safe levels (DNELs/PNECs and surrogates) + considerations of ‘special cases’
 - Excel-based tool
 - Workers and environment

Mixtures: Safe use information in SDS for safety in the supply chain

- **‘Bottom-up’**: DUCC ‘approach for end-use mixtures in specific sectors, for workers.
 - Consistent with ongoing work: improved use maps, BAuA RMM packages
 - Terminology proposed (SWED, SUMI)
- **Further work is still needed on both approaches: pls test it and provide feedback**

Connecting occupational practices and REACH CSA: For consistency

- **RMM Packages:** Connecting occupational risk management to the REACH chemical safety assessment (CSA) – BAuA project
 - Basis: connecting existing RMM Packages for workers ‘pre-REACH’ with structured ES to describe safe use (21 RMM packages screened and analysed)
 - Further evaluation needed
 - More structuring and standardisation to adapt RMM packages to REACH ES
 - Ensure connection to other ENES activities (J. Urbanus, DUCC bottom-up)
- **REACH/CLP vs other legislation: ECHA case study** (Action 5 of Roadmap), Ni electroplating (many activities, chemicals)
 - At end-user level
 - REACH/CLP information can support application of other requirements e.g. IED, OHS legislation if SDS/ES quality is good
 - ENES community to contribute: questionnaire will be sent
 - **Workshop in Helsinki: March 2015**

IT assesment tools

for transparent and realistic assessments

- **IUCLID 6** update to improve exchange with other IT systems, clarity on CSR/ES and hence efficiency in screening. **For release 1Q2016 (after testing)**
 - Align with OECD Harmonised template on use and exposure
 - « complex » substances aspects ('assessment entity' concept)
- **Chesar 3** alignment with recent/upcoming developments: e.g. use maps, export in ESCOM XML format, implement Structured Short Titles
 - **Consultation planned 1/2Q2015**
 - Chesar training and promotion planned

CSA Guidance update: to reflect experience gained and recent developments

- **Streamlining + (major?) updates**
- Guidance complemented with Practical Guides (exemplification) and Formats/Templates separately
- ‘Use description’: improve understanding and systematic application of descriptors
- Exposure Scenario building
- Exposure Assessment part (Part D): exposure determinants, RMM libraries, contributing scenarios, sector use maps
- Consumer exposure: reflect SCEDs
- Environmental exposure: SpERCs and more focus on OC and released

- **Discussed in break-out groups: summary to be issued**

Looking ahead

- Your feedback, input, case studies are very valuable: **pls contribute**
 - Mixtures
 - BAuA project on RMM packages
 - ECHA case study on REACH and OHS
 - Guidance updates
- Maintain the resources !
- **We should implement and disseminate what we already have**

➔ It is all about good quality information for the safe use of chemicals
➔ REACH is not a one-shot

ENES 8

- Pencil the date: 20-21 May 2015
- Helsinki, ECHA ?