



Feedback from developers on Sector Use Maps - Fertilizer sector

ENES Workshop on Sector Use Maps
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Fertilizer sector working group, "FUM"

CONTRIBUTORS -we did it together !

- Fertilizers Europe
- Farm consortium
- ReachCentrum, coordinator
- Yara International ASA
- Borealis AG
- ICL Group
- Tessenderlo
- Anwil

OBJECTIVES

- Improved fertilizer sector uses map
- Improved exposure assessment – coverage of human and environmental exposures

FERTILIZER SECTOR USE MAP (link)
wants to cover the uses of :



Registrants
(manufacturers)

Formulators
(making blends)

Professionals (end
users)

Consumers
(end users)

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What are fertilizers and who are the users

FERTILIZERS CONTAIN

- Nutrients
 - ✓ Nitrates, potassium salts, phosphates, trace elements (e.g. Cu-sulphate, Mn-sulphate etc)...
- Co-formulants
 - ✓ Fillers, colours, coatings, stabilizers, surfactants etc.

FERTILIZERS ARE APPLIED

- Outdoor and indoor
- In solid or in liquid form
- For the crops according to their needs
- Soil fertility, crop developmental stage etc are taken into account
- To ensure crop/harvest growth and to correct nutrient deficiencies

FERTILIZER USERS

- Professionals – all farmers/growers are professional workers
- Consumers

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FUM schedule

Uses coverage checks on raw materials:
Suppliers had not assessed fertilizer uses in their eSDS
or there were differences in the views how to describe fertilizer
uses by PROC and ERC codes

ENES6 (May 2014)
encouraged sectors to
create/improve uses maps

ECHA
Template
testing group

FUM online meetings

FUM map
published

plan
ning

call


ECHA Template was tested	FUM Working group established	Uses were drafted	Map was filled	Quality checks :	FUM published	Improvements on exposure assessment
2014	2015	-Old fertilizer sector map (2010) was the basis	-Use descriptors were assigned -IU and CA names etc agreed -awareness about the needs to consider sector specific assessment inputs increased (spERC?)	-updated R12 -uses map Template	on Cefic platform -fertilizer sector uses map -Position paper to document ERC rationale	-spERC? -SUMI? ESCom?
						2016

ENES 9

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Working group challenges




- Understand the scope of the work
- All companies did not see the need to create the sector uses map
- Find common time and experienced resources for the work
- Confidentiality and EU competition law might have caused hesitation
- Sector was forced to think together:
 - ✓ What kind of products does our sector have ?
 - ✓ How are our products really used ?
 - ✓ How can we describe the uses on a harmonious way ?
 - ✓ Which phrases would be descriptive and simple enough ?
 - ✓ Which use descriptors to be assigned ?
 - ✓ How to interpret ECHA guidances ?
- Sector also challenged ECHA with questions
- FUM taught us lot - by discussing we were able to agree (see next slides)
- Tips: document your decisions !
 - ✓ we published map + a document showing the rationale behind the selected use descriptors



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FUM helped to understand the boundaries of an identified use




- **Professional use of fertilizers.**
One use is enough - no need to split these steps to separate identified uses:
 - ✓ Step 1. mixing, dilution, dissolving
 - ✓ Step 2. loading fertilizers into the equipment
 - ✓ Step 3. applying the fertilizer with different techniques (spreading, spraying, fertigation ...)
 - ✓ Step 4. cleaning the equipment
- Step1 is not a separate activity of "formulation"

Use name	Further description of use
3	4
Professional use of fertilizers:	Mixing and loading of liquid or solid fertilizers into the equipment and applying with different techniques (spreading, spraying, fertigation etc.) for the crop by farmers, growers and contractors.

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FUM helped to understand the content of the use descriptors within our sector

ERC3

- Formulation by incorporating fertilizers onto or into a matrix.

PROC8a

- Unloading and loading of fertilizer without exposure controls in place, including sampling and cleaning fertilizer residues from the equipment.

PROC11

- Air-dispersive application of liquid fertilizers or powders.

PROC 14

- Production of fertilizers by granulation or low-energy compression.

PROC28

- Manual maintenance of equipment during intentional pauses and blockages of fertilizer production process.

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Benefit 1: Fertilizer sector *DUs* have it easier to convince the raw material registrants to register the fertilizer uses properly

EXAMPLE – FERTILIZERS HAVE NO SERVICE LIFE

- Some registrants have thought that fertilizer granules are articles
- FUM conclusion: mixture of substances
- Rockwool cubes imbibed with fertilizers – are they articles ?
- FUM conclusion: combination of article and substance(s)
- Fertilizer coated seeds – are they articles ?
- FUM conclusion: combination of article and substance(s)




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Benefit 2: Fertilizer sector *manufacturers* can submit high quality dossiers

- Clear data on uses is easily available to perform the chemical safety assessment
 - ✓ Uses of industrial fertilizer formulators and professional fertilizer end users
- Uses become described in the dossiers of different substances on a harmonized way
- Consistency between the *Exposure Scenarios for communication* of different substances will improve
- Manufacturers will get less complaints from DUs and avoid troublesome communication on uses with them
- Realistic use descriptions allow proper exposure&risk assessment
This will ensure the proper, realistic safety instructions in the eSDS




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ESCom phrases – how to implement ?

- **Use name** and **CA name** should be built by combining ESCom phrases
- Originally sectors were encouraged to use sector specific language – can ESCom fulfill the expectations and stay compact enough ?




Example1

- Use name: Professional use of fertilizers.



Works well !


- CA name (PROC5): Handling of fertilizer in stages with significant contact.



Not sector language, this is PROC5 text

Example2

- Use name: Incorporation of ammonia into soil for fertilizing.




Perhaps we can leave "ammonia" away?

- CA name (PROC8a): Soil injection of ammonia for fertilizing without exposure controls in place.

No ESCom phrase available...

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What to improve in Sector use maps ?



- Standardisation of phrases has helped us to understand, what we are talking about
 - ✓ E.g. "formulation" is restricted to industrial setting only
 - ✓ *Exposure scenario for communication* refers to eSDS only
 - ✓ *Exposure scenario* refers to ES in CSR only
 - ✓ *Use name = Exposure scenario name*
- Still confusion and room for clarification
- More examples would be of help
- Use name = ES name ← applicable for ESs in CSR only ?
- *ES short title for communication* ← is it the title of the ES in eSDS ?
- If yes, how to list the *Use names*, belonging to this *ES for communication* ?
Concrete examples on lay-outs needed !
- Tools need to play together
- Full alignment with phrases between Uses map Template, IU5, R12, other guidances and presentations is crucial

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Future work - fertilizer sector



- Adaptation with ECom library
 - ✓ New phrases ?
- Developments on specific assessment inputs
 - Environment – spERCs ?
 - Human – SWEDs and SUMIs ?



Thank you!

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