



International Association for Soaps,  
Detergents and Maintenance Products

## Use maps Workshop

*A.I.S.E. experience – working with the  
improved template*

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## Scope & Agenda



### Aim of the presentation

- Overview of the work done by A.I.S.E.
- Presentation of issues faced while filling the use maps, some *for discussion today*, some closed, some as tips for sectors who will approach the work in the future/develop support for sectors

### Content

- Introduction
- Organisation of the work
- Using the template



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## Introduction (1/2)



Why did A.I.S.E. decide to work as a sector on the Use Description?

### Challenges for detergents' formulators:

- Low quality substance SDSs
- (End)uses not covered
- Unrealistic RMM/OC
- > 60% SMEs → difficult to establish 1:1 communication with suppliers

### Solution: Sector Use Maps!



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## Introduction – (2/2)



How did A.I.S.E. approach the work?

- First table of uses made available to members in 2009, followed by updates in 2011 and 2014 of different parts
- Changes made because of new information available, feedback by members on more representative conditions of use, alignment with new guidance material, ...
- On-going: Update of the Use Maps to use the improved template, check of conditions of use, new R12 Guidance published, ...



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## Organisation of the work – (1/2)



How did A.I.S.E. organize the work?

- Initial review done separately by two working groups of two national associations and then discussed by an internal working group after harmonized EU templates made available
- Review done splitting between professional/industrial/consumer uses and carried out for all the groups in parallel;



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## Organisation of the work – (2/2)



What are the issues faced?

Very technical work that requires the **expertise from the companies**, BUT very difficult to motivate companies to invest resources because of:

- Delay in availability of templates → work first on what is certain (Issue closed with templates publication)
- Overlap with other legislative deadlines → Use maps are perceived as a priority, but it is not a mandatory requirement ... (Tip for future work: explaining how the information in the use maps can be useful for the work of registrants/DUs can help)
- *Uncertainty of consideration from industry (registrants), based on the experience of previous work → What can be done to ensure Use maps are used once published? The availability of an harmonized template is already a very good start! BUT what else?*



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## Using the template – (1/3)



### Scope & Split into uses and Contributing Activities (CAs)

This part required a lot of discussions (some still on-going)

- **Scope:** which uses should be covered? One of the reasons for DUs to work on use maps is to receive good ES, but at (detergent) manufacturing site many products are used. What if other those sectors don't prepare the use maps? Should we cover also other relevant product categories? → Tip for future work: strategy to ensure more sectors are involved
- **Use/CAs split:** Difficulty to decide when we are facing two different uses, when two different contributing activities and how granular the use map should be. Different approaches were initially used by the groups, but the examples in the template and the exchange with other sectors helped to find a common approach → Tip for future work: develop examples and keep dialogue open between use maps developers
- **Borderline cases:** professional/industrial: not always clear how to choose. Decision made on the expertise of companies and principles defined to ensure all cases are considered equally (Also explanations in R12 guidance helped once available)



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## Using the template – (2/3)



### Selecting Use descriptors & linking exposure assessment inputs to CAs

- **Selecting use descriptors:** the help provided by the smart Excel template is a great support for this task! Unfortunately, part of the work was done before having it and some specific points are being looked at again:
  - Border line LCS
  - Combination of a specific LCS + CA type + PROC
- **Linking Exposure assessment input:** the link itself is easy, discussions are currently on-going on the level of specificity of the assessment inputs (requirements for CHESAR/IT tools have to be accounted for too ...)



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## Using the template – (3/3)



### Providing use names and CA names and role of ESCom Phrases

This part required a lot of discussions (some still on-going)

- Difficulty to decide *at which stage to include the details on the process description*: in the 'Further description of use', in the CA name, in the optional fields or just leave them to the SWEDs? It depends also on *uncertainty on where the registrant will look in the use maps for the information needed*
- Difficulty in **aligning** naming, level of details in the different tables (use maps, SWED...) **without repeating** ...
- **Level RMM** : Difficulty to *indicate (and how) that the activity is the same, but it can be carried out at different level of RMMs*, e.g. application by spraying, in one case the facility has an LEV system, while in other cases only PPE available → how should this be reflected in the use maps? Via CA name? Via SWED name?
- **ESCom Phrases**: the smart template provides a very good starting point for ESCom phrase assignment (also SWED one!). However, not all phrases available, especially for names. Beyond this:
  - *If a new ESCom phrase is developed, will its code inclusion in the use map be considered as an update?*
  - *Stability in ESCom already existing set is essential*



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