

Processing safe use for Resin Mixtures under REACH



Issues and concerns with current ENES Tools

Resin Technical Platform (RTP) TF extended SDS for Mixtures

1 May 2017

AGENDA

Processing safe use for (resin) mixtures

□ Introduction

□ Landscape of Resin Mixtures

□ Processing safe use for mixtures under REACH
– *issues & concerns with ENES Tools*

□ What do we need?

Introduction

Who we are & purpose of this presentation

Resins Technical Platform (RTP)

The Resins Technical Platform (RTP) aims to unite and strengthen the activities of individual sector groups and associations within Cefic in the field of resins.

RTP TF “extended SDS for mixtures”

The RTP Task Force “extended SDS for Mixtures” is addressing and advising the resin industry on issues related to the extended SDS for mixtures under REACH.

Associations and sector groups currently represented in the TF:

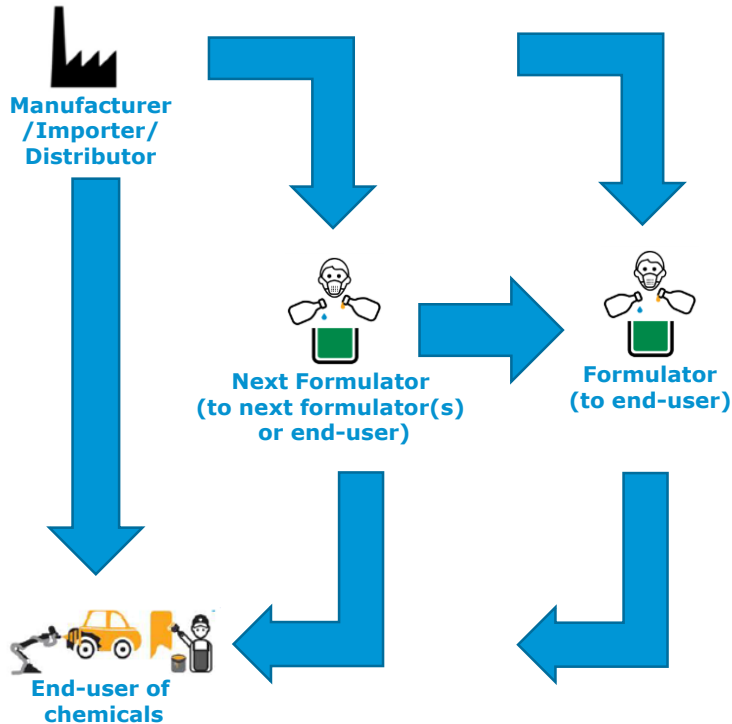
- CEPE – European Council of the Paint, Printing Ink and Artists’ Colours Industry
- FORMACARE – Formaldehyde Sector Group
- HARPPA – Hydrocarbon and Rosin Resins Producers Association
- PPRM – Polyester Powder Resin Manufacturers
- SRM – Solvent Resin Manufacturers
- UVEB – UV/EB acrylate resins sector group & UPR – Unsaturated Polyester Resins sector group

With this presentation we like to raise awareness of our issues and concerns with the current methods for processing safe use of mixtures for the stakeholders in our resins mixtures supply chain.

Landscape of Resin Mixtures

A complex but representative supply chain involving various industries

Representative supply chain



Upstream

Monomers, Oligomers, Solvents, Pigments & extenders, Resins, Additives and other raw materials for Resins production



REACH Consortia
 TMA Consortium
 HPPA Consortium
 Others

Downstream

A Resin is a natural or synthetic compound that begins in a viscous or solid state and hardens with treatment. They are often mixtures and used in various other mixtures and applications (within various DU sectors).

Press mass (Binder for the manufacture of friction linings), Paper industry, Textile Industry, Glass fleece and Insulation, Rubber & Tire Industry, Chemical Intermediate, Monomer reactant, Water Treatment, Adhesives & Sealants, Building Industry, Cement and concrete superplasticizer, Coatings, Paints, Impregnates (laminates, edge bandings), etcetera



Other Sectors
 Not all known and /or active

Processing safe use for mixtures

Issues with the Top Down (LCID) Method

Top down approach: add the ES(s) of the relevant components

- Very long documents.
- Not standard phrases yet, 27 languages
- Scope ES: OK for production & formulation. Downstream uses in mixtures less clear
- In complex value chain (multiple formulator steps): organizing upstream and downstream communication

Lead component selection (LCID) method

- How to consolidate the OCs and RMMs? ('cut and paste' instruction is missing, non harmonized formats/CS's). No SUMI format provided.
- Identification of the correct lead components is not only depending the mixture properties but also relates to the operational conditions of the activity (e.g. lead component can be different for the same activity at a higher temperature).
- The LCID method can be automated (selection of lead components); not clear how to automate the generation and inclusion of the SUMI(s) in the SDS Software

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Issues with the Bottom-up SUMI Method (1)

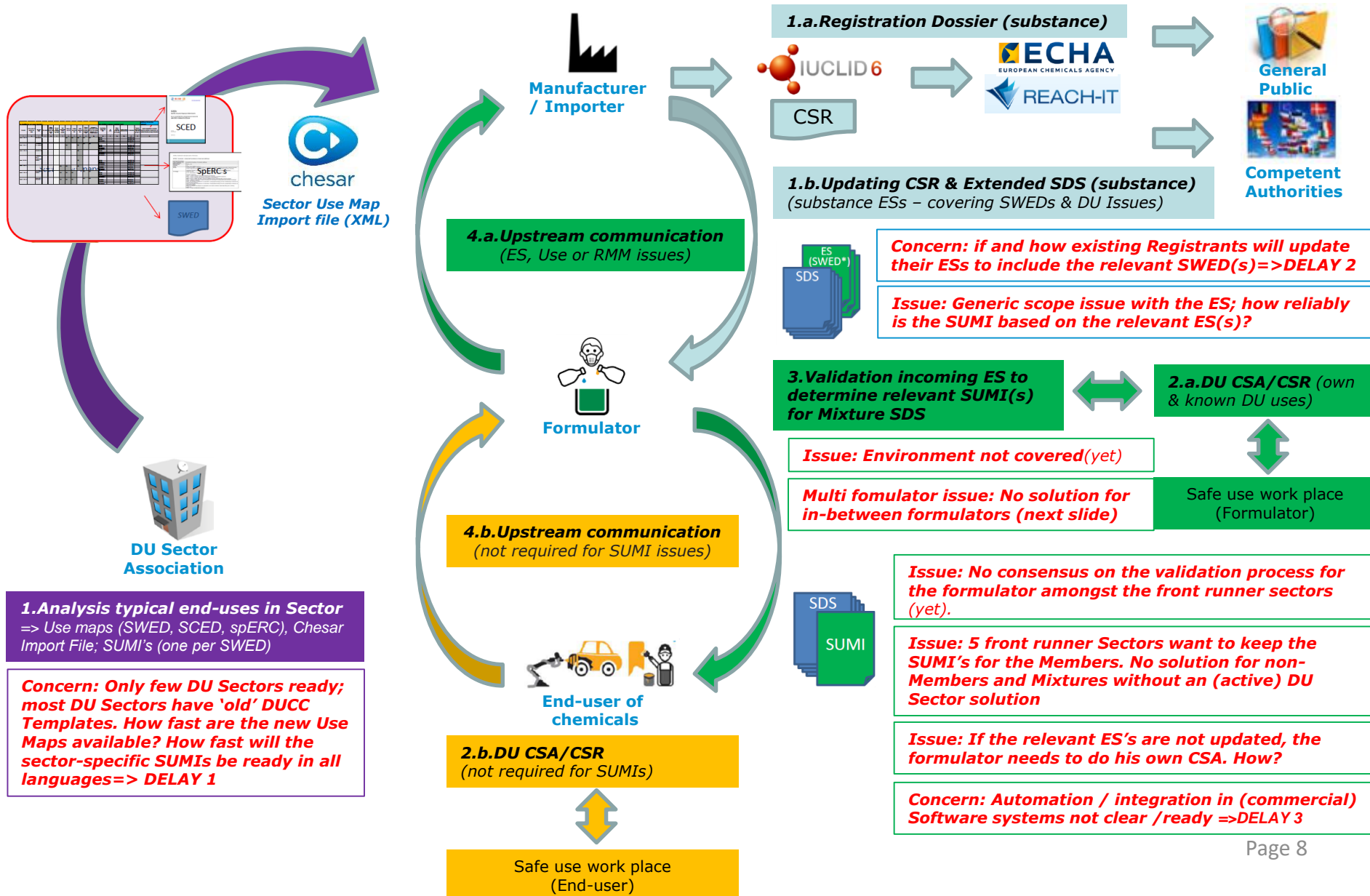
Bottom up: Concised Safe use info to End user

DUCC SUMI – SWED (Specific Worker Exposure Determinants)

- Focused on formulator to end user(s).
- No solution for In between formulators. They have to deal with:
 - *What to send to next level formulators?*
 - *How to process safe use for the in between mixture uses?*
- All formulators have to deal with:
 - *Different SWED(s) per sector*
 - *Different validation approaches (minimal tolerable DNEL, other methods). No consensus yet.*
 - *Environmental part not yet covered*
- Serious delays can be expected:
 - *Not all sectors are active / ready with the new Use Maps. Creation of a Use map is time consuming.*
 - *SUMI's exclusive for sector. What to do with mixture without association?*
 - *Substance ES(s) must be updated acc. to sector SWED's. Concern that registrants are not aware and/or have no capacity to update their ES(s). if no SWED codes included, then what?*
 - *Automation not ready*

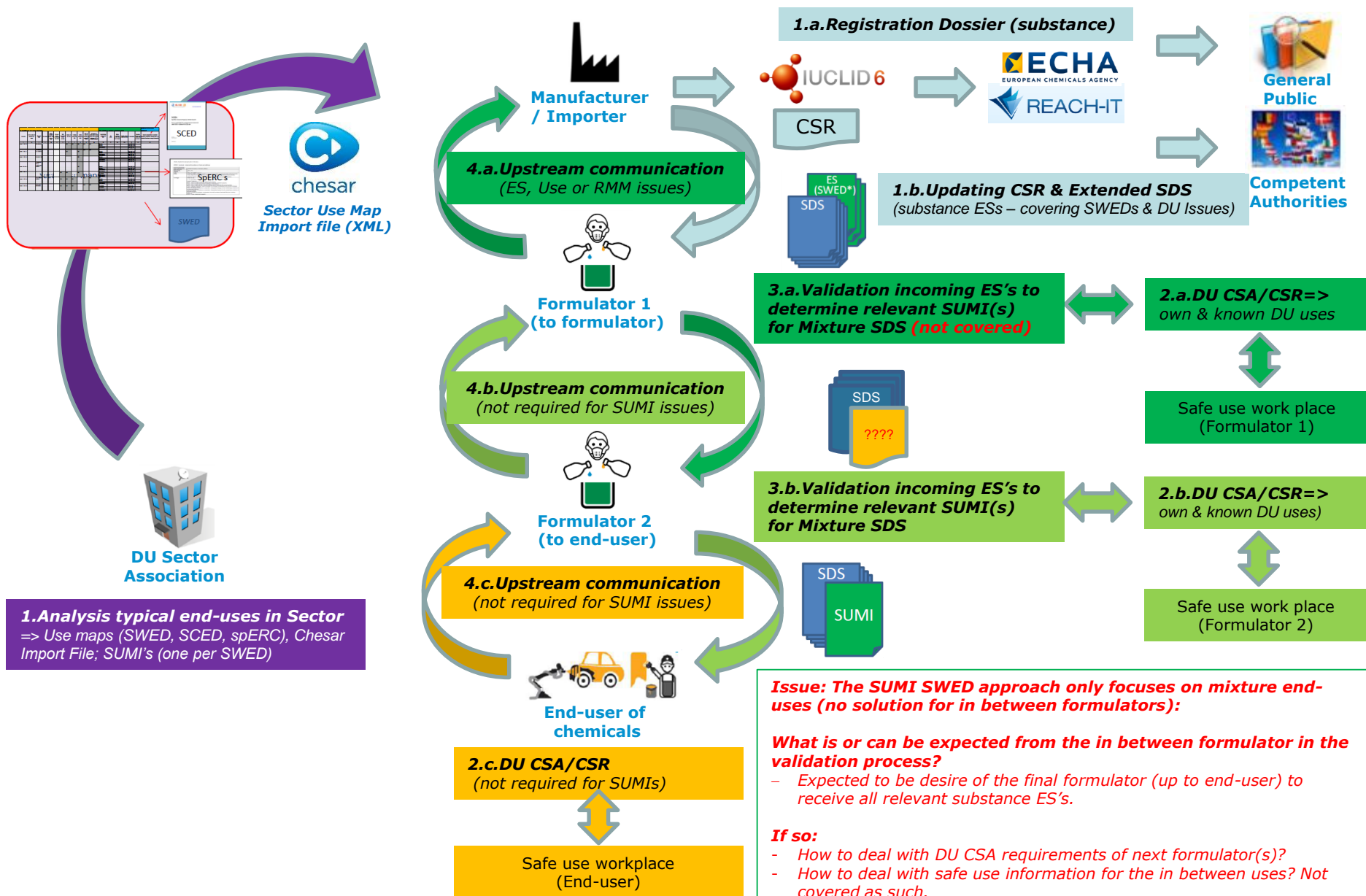
Processing safe use for mixtures

Issues with the Bottom-up SUMI Method (2)



Processing safe use for mixtures

Issues with the Bottom-up SUMI Method (3)



What do we need?

Suggestions for improvement / consideration

Main issue

- The current set of ENES Tools for processing safe use information of mixtures does not provide a complete solution for the (in between) formulator(s) in the multi sector supply chain of resins

Improving the methodology

- Focus on harmonization. One solution for processing safe use information for mixtures (worker and environment) in stead of various deviating tools and formats.
- Focus on automatable solution within or connected to SDS Software tools.

Improving the process

- Should be a balanced effort for all Stakeholders: Registrants, Formulators (including in between formulators), Distributors and End users
- Focus on the added value for the stakeholders (e.g. practical processes & understandable safe use information for all)
- The RTP TF “extended SDS for Mixtures” keeps on looking for solutions as such