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ENES 12 Registrant input eSDS authoring
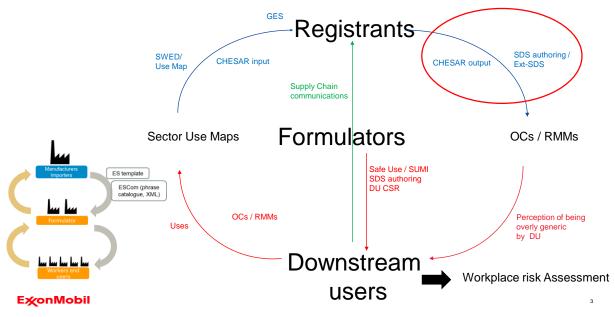
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Overview

- Communication of safe use advice to Downstream Users (DUs)
- Challenges faced by registrants
  - On going administrative updates / IT tools.
  - Variety of IT tools for eSDS authoring
  - "The Mixture" eSDS issue
  - Provision of safe and healthy workplace and conditions of work

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Safe Use communication

GES

SWED/ Use Map   CHESAR input

Registrants

CHESAR output   SDS authoring / Ext-SDS

Supply Chain communications

Sector Use Maps   # Formulators   OCs / RMMs

Safe Use / SUMI
SDS authoring
DU CSR

ES template

ESCom (phrase catalogue, XML)

OCs / RMMs   Perception of being overly generic by DU

Uses

Downstream users   Workplace risk Assessment

Manufacturers Importers
Formulator
Workers end users

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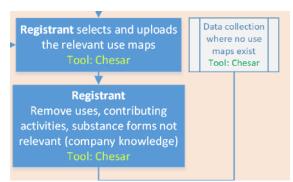
Challenge 1 –Ongoing Administrative Updates (IT tools)

- ES and CSR produced in CHESAR based on GES or Sector Use Maps
- Format (ES template)
  - Table of Content linked to; Short titles/ES naming convention
    - Some sector use maps have long titles to describe variations in the conditions of use
  - Repetition of operational conditions for different activities
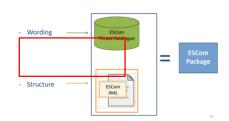
If registrant use "full" Use maps as default

    Identify which Uses/ tasks might apply

        If information is not available from marketing etc.

        All use map information uploaded

            Concentration / Duration reviews for x00s for

            workers, consumers and environment

Registrant selects and uploads the relevant use maps
Tool: Chesar

Data collection where no use maps exist
Tool: Chesar

Registrant
Remove uses, contributing activities, substance forms not relevant (company knowledge)
Tool: Chesar

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Challenge 1 –Ongoing Administrative Updates (IT tools)

- Content → ESCom Standard Phrase Catalogue

  - Missing phrases (e.g. non-std RMMs)

  - Management of Change (MOC) process

  - Translation within IT tools / registrant

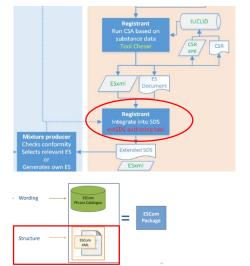 (ESCOM has few languages at the moment)

- The complex map on a previous slide shows the tremendous level of administrative updates and communications that must be managed by the current expectations, and the need for a robust MOC

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Challenge 2 – IT tools for eSDS authoring

- Various (third-party) SDS authoring systems used

- No direct electronic import of ES
  - Requires copy-paste
    - Not efficient
    - Not consistent
    - Prone to manual errors
    - Needs QA check

  - ESCom XML standard as a potential solution
    - ES filled 100% with standard phrases

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Challenge 3 – eSDS for mixtures

- Who knows the Downstream uses best
  - Registrant or formulator ?
- Formulator needs to understand and convey
  substance information to DU
  - Registrant needs to know Uses and existing RMMs and
    OC in place in the supply chain
  - Registrant completes substance CSR and shares safe
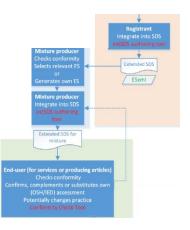   use via ES in eSDS

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Challenge 3 – eSDS for mixtures

- Formulator provides safe use for a mixture
  - Formulator can provide ESs from all substances in a mixture
    - Different registrants, possibly different formats
- Communication format depends on the mixture (i.e.
  classification, uses)
    - Lead Component Identification (LCID)
    - SUMI selection method
    - Different type of end user
  - Flexibility is a key
- Safe use of hazardous mixtures at DU level requires
  - Alignment with
    - Safe use information as part of REACH process, Workplace risk
      assessment, Industrial emissions permitting

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Stakeholders proposals / considerations

- Considerations for discussion
  - Should the RCR <1 for chemical safety assessment be clearer defined (0.9, 0.5 etc)

  - How can the Maximum concentration for use of a substance in a mixture be used to drive efficiency

  - Identify if mapping between Generic Exposure Scenarios (GES) and sector use maps can be improved

  - ESCom XML standard as a potential solution with ES filled 100% with standard phrases

  - Is there a need for a Management of change process to be put in place (inc IUCLID/Chesar link)

  - How can the distribution of electronic eSDS be facilitated, and is it needed
    - Identify solutions for provision of Electronic / interactive SDS

  - Tools for IT solutions to communicate e.g CHESAR to SDS authoring or equivalent XML

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Questions?
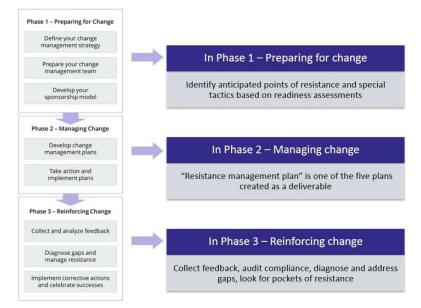
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Additional text slides
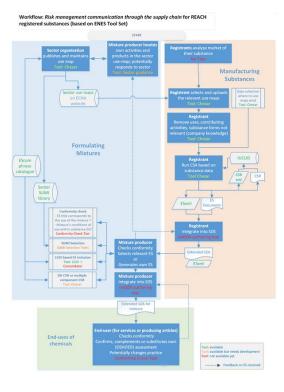
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Management of change

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Management of change

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Safe use information to the DU

- How to ensure the health and safety of DU is maintained when working with mixtures

  - Information to support the workplace risk assessment from REACH

  - Information instead of the workplace risk assessment from REACH

  - Ambiguous information from REACH and OSH processes

- Formulator to DU communication for mixtures
  - Forward OC/RMMs and annex from substance SDS
  - Formulator to share safe use information
    - DU CSR/ SUMI/ ???

- Up supply chain communication of uses via Sector use maps, SWEDs

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