



## SUMI selection for mixture safety data sheets

***Safe Use of Mixtures Information***  
***- standard sectorial methods from***  
***DU sector organisations***



Jan Robinson  
 ENES 12  
 21 November 2019

1

### Safe use information for mixtures: A 'bottom-up' approach



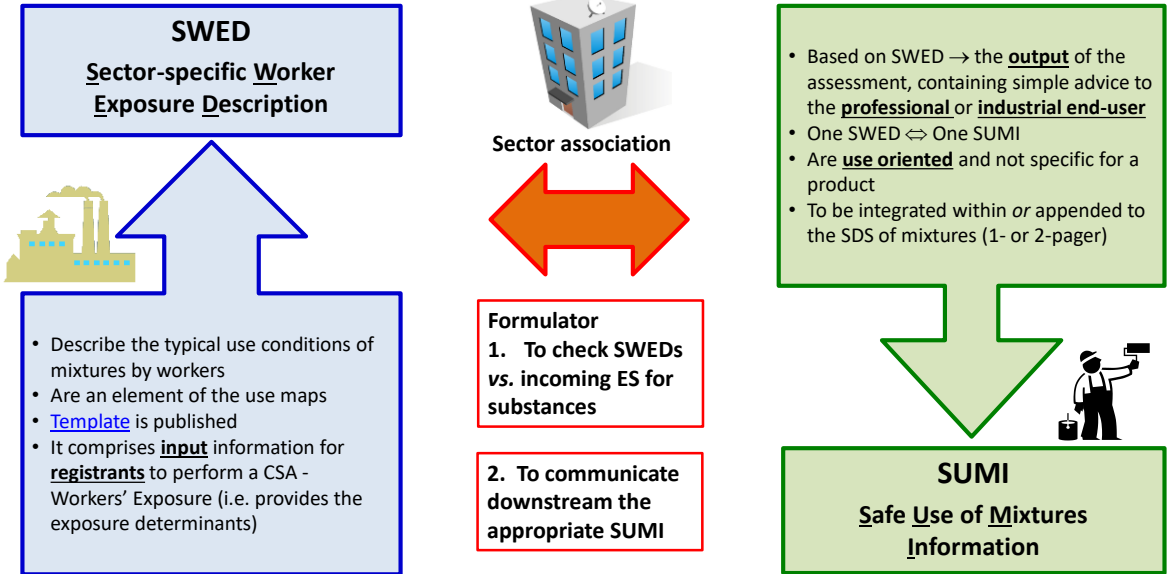
- REACH requires downstream users (formulators) to check that exposure scenarios they receive for substances cover all relevant uses, and to
  - adopt the Operational Conditions and Risk Management Measures relevant for their own use(s)  
 → *session later on workplace safety assessment*
  - **pass on relevant information to the next actor in the supply chain to their customers**
- Formulators need to decide how to convert/consolidate exposure scenario information on substances into safe use information for their mixtures
- A sectorial 'bottom-up' approach is suitable for **end-use** mixtures with clearly defined markets and uses
  - DU sector organisations are well placed to identify the typical uses of their products, with standardized conditions of use

2

2

## SUMI selection methods

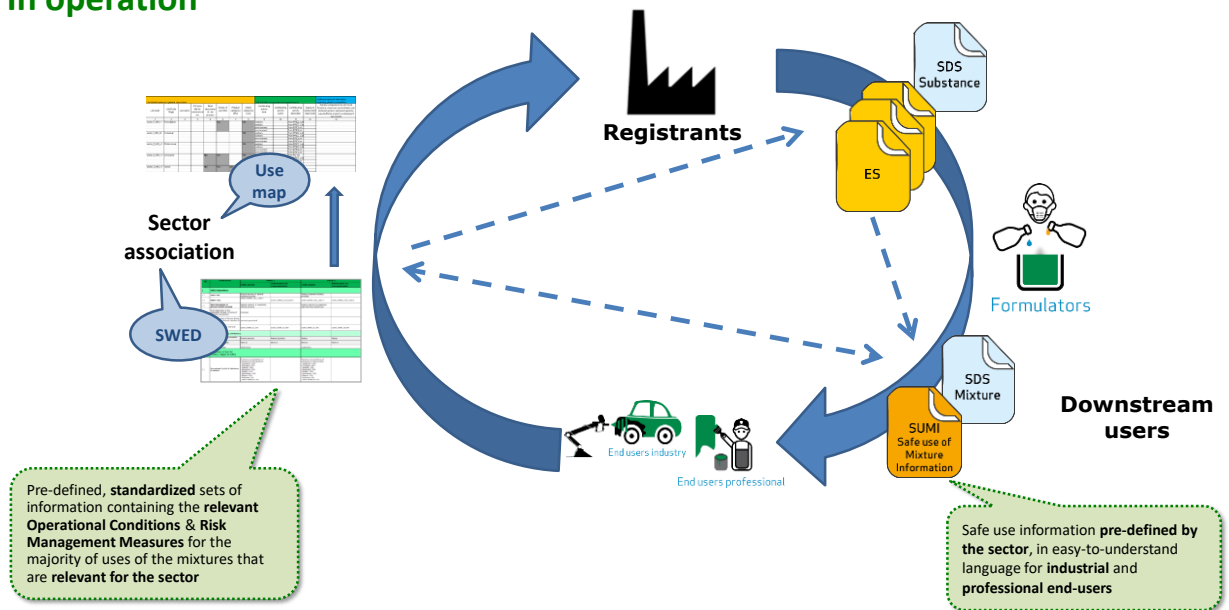
### The elements



3

## SUMI selection methods



### In operation



4

## SUMI - The template



Mandatory SUMI content		Optional SUMI content
<b>SUMI:</b> Safe Use of Mixtures Information for end-users		<b>Good practice advice</b> If relevant, applicable (sector-specific) good practice advice  <i>Use of pictograms when available</i>   <b>Additional information on product composition</b> To include references to other relevant sections of SDS or product label          Sector_SUMI_code / version number
<b>Sector / Company logo</b>		
<b>Sector_SUMI_code:</b> Title of SUMI		
General description of process covered <i>May include use descriptor codes or reference to SWED</i>		
<b>Operational Conditions</b>		
Maximum duration:	xx min.	
Other:	xxx	
<b>Risk Management Measures</b>		
Required RMMS, use of pictograms 		
<i>Reference to Section 8 of SDS for RMM specifications</i>		
<i>If applicable: any environmental measures</i>		
<b>Disclaimer</b>		
<i>Disclaimer on boundaries of SUMI use</i>		
Sector_SUMI_code / version number		

NOTE: This format can be adapted by companies. Published on [DUCC website](http://ducc.org).

5

5

## SUMIs

### Some considerations on their use



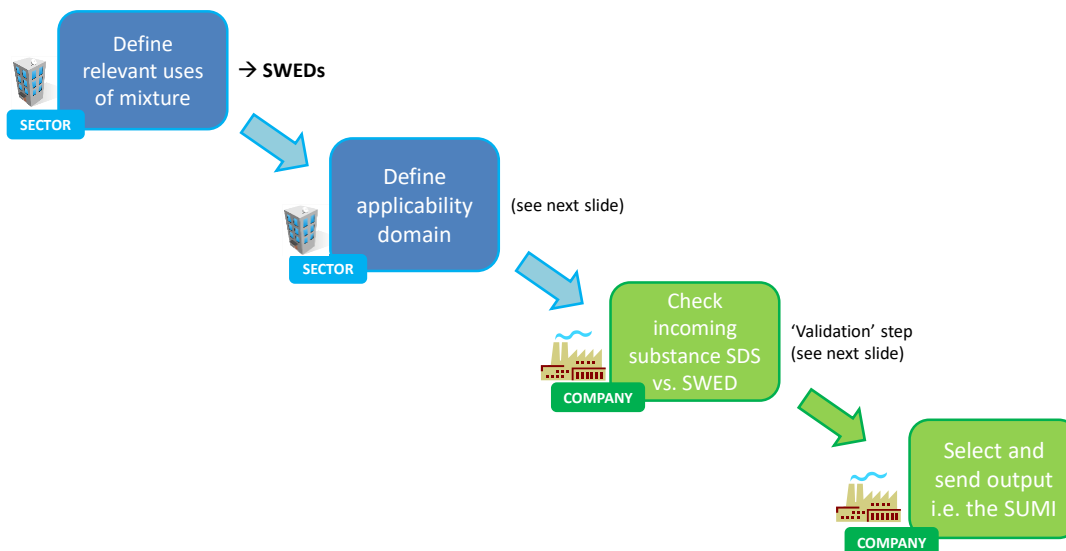
- Sending information on safe use is mandatory for **hazardous** mixtures (REACH Art. 31(7))
  - Therefore SUMIs would be expected for classified products only
- SUMIs do not replace **SDS**!
  - The SDS includes **product-specific** information (classification, specifications of Personal Protective Equipment, ...) and SUMI is for the **use**
- Sometimes **more than one SUMI** can be integrated within *or* appended to the SDS
  - Depending on the way that typical uses are defined by the sectors, *and/or* the uses that are relevant for a customer
- SUMIs should be **translated** into all relevant languages (made available by sectors)
  - Since they form an integral part of the mixture SDS

6

6

## SUMI selection methods

### The process – in brief



7

## SUMI selection methods

### The process



- Each sector defines the **'applicability domain'** for its SWEDs and SUMIs
  - Qualitatively, e.g. by specifying the product types or hazard classifications to which each applies; *or*
  - Quantitatively, by calculating expected exposures (e.g. using ECETOC TRA)
- The formulator has to:
  1. Identify the SWED+SUMI that most appropriately reflects his customer's use
  2. Carry out a **'validation'** step for each relevant\* substance in the mixture
    - Check received substance ES against the OCs and RMMs in the SWED/SUMI, to ensure the second are at least equal to the first
    - In some sectors a quantitative screening option is also available, to check if use is safe ( $RCR < 1$ ) by comparing substance DNEL vs. calculated exposures

\* Typically validation will not be required for *every* substance in the mixture, but only for those determining the risk / contributing to the classification of the mixture

➔ Validation will be supported by **electronic tools** in future (e.g. ECom)

8

8

## SUMI selection methods

### Key aspects



- Prepared by **sector associations**
  - The concept was developed by Ducc members, but other DU sectors can also consider developing their own SWEDs and SUMIs
- Currently focused on **human health for workers**
  - A similar approach for environmental information is in development
- Developed to cover the **majority of typical uses** in a sector ('80:20 rule')
  - Formulators have a range of options if a standard SUMI cannot be selected/validated, e.g.
    - Provide SWEDs to supplier and request updating of CSR and ES
    - Customize SWED and SUMI to reflect customer's use
    - Apply a 'top-down' method, such as LCID
    - Carry out a DU CSA
    - Change supplier or substitute the substance

9

9

## SUMI selection methods

### In a nutshell



- Support **formulators** in complying with their obligations under REACH
- Help to improve **communication in the supply chain** and the **safe use of chemical mixtures by end users**
- An explanatory document is available on the Ducc website at <http://www.ducc.eu/Publications.aspx>
- Information can also be found on ECHA's webpages at <https://echa.europa.eu/communication-in-the-supply-chain>

10

10