REGISTRANT INPUT INTO ESDS AUTHORING

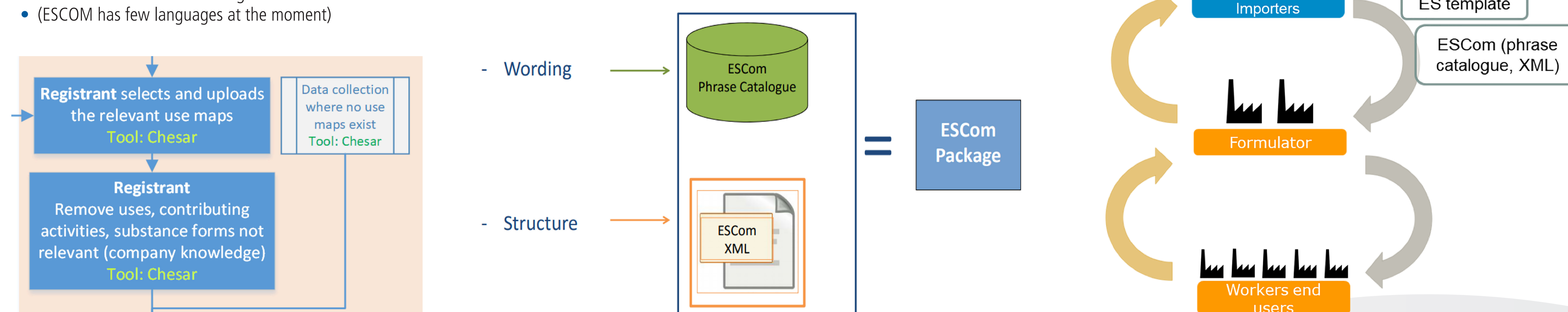**ENES** — EXCHANGE NETWORK ON EXPOSURE SCENARIOS

DAVE MARSH - ENES 12 WORKSHOP, 21 NOVEMBER 2019

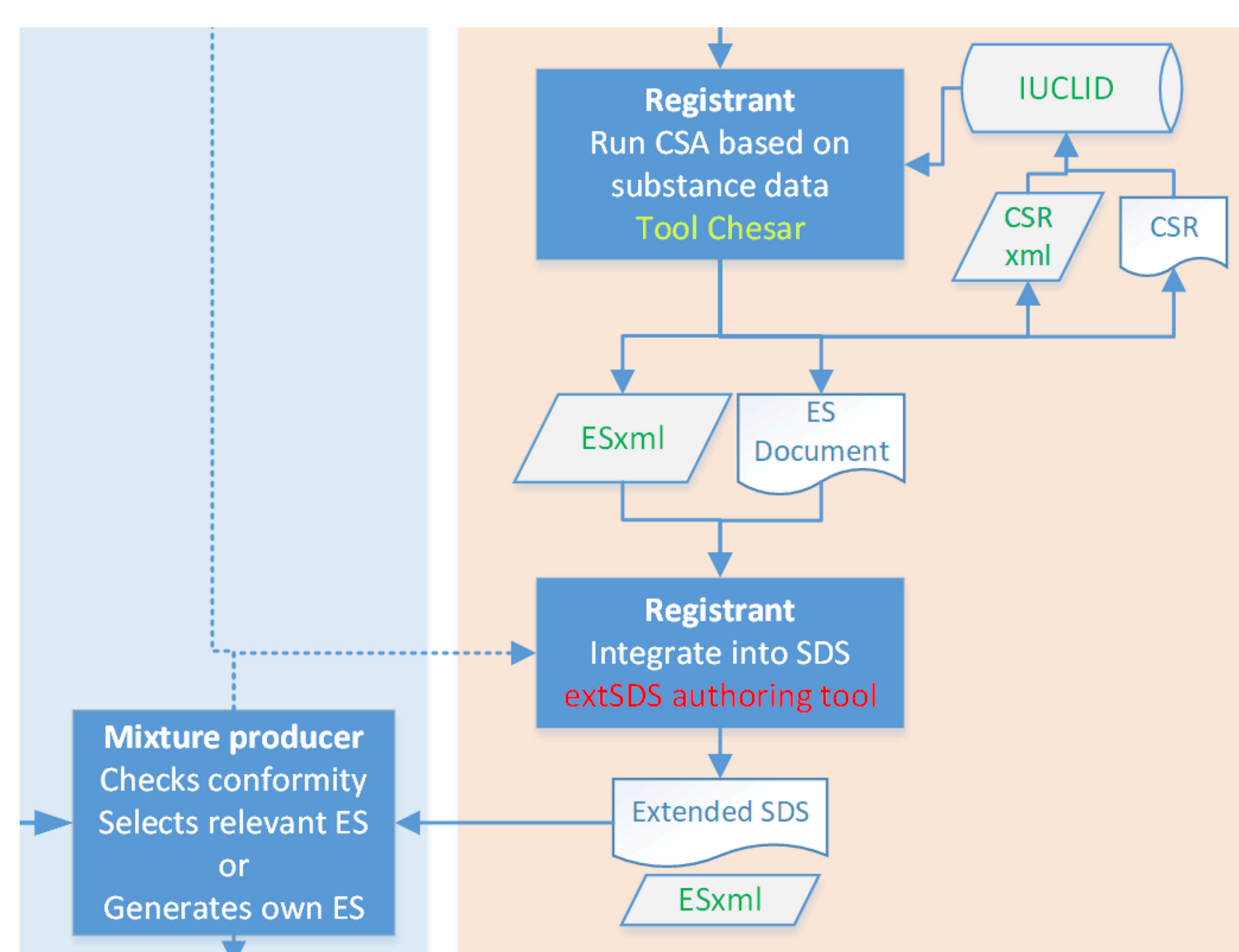## Challenge 1 : Ongoing Administrative Updates (IT tools)

- 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
  - Repetition of operational conditions for different activities
- Registrant use "full" Use maps as default
  - Concentration / Duration reviews for x00s for workers, consumers and environment
- Content -> ESCom Standard Phrase Catalogue
  - Missing phrases (e.g. non-standard 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

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

- Wording → ESCom Phrase Catalogue
- Structure → ESCom XML

= ESCom Package

Manufacturers Importers

ES template

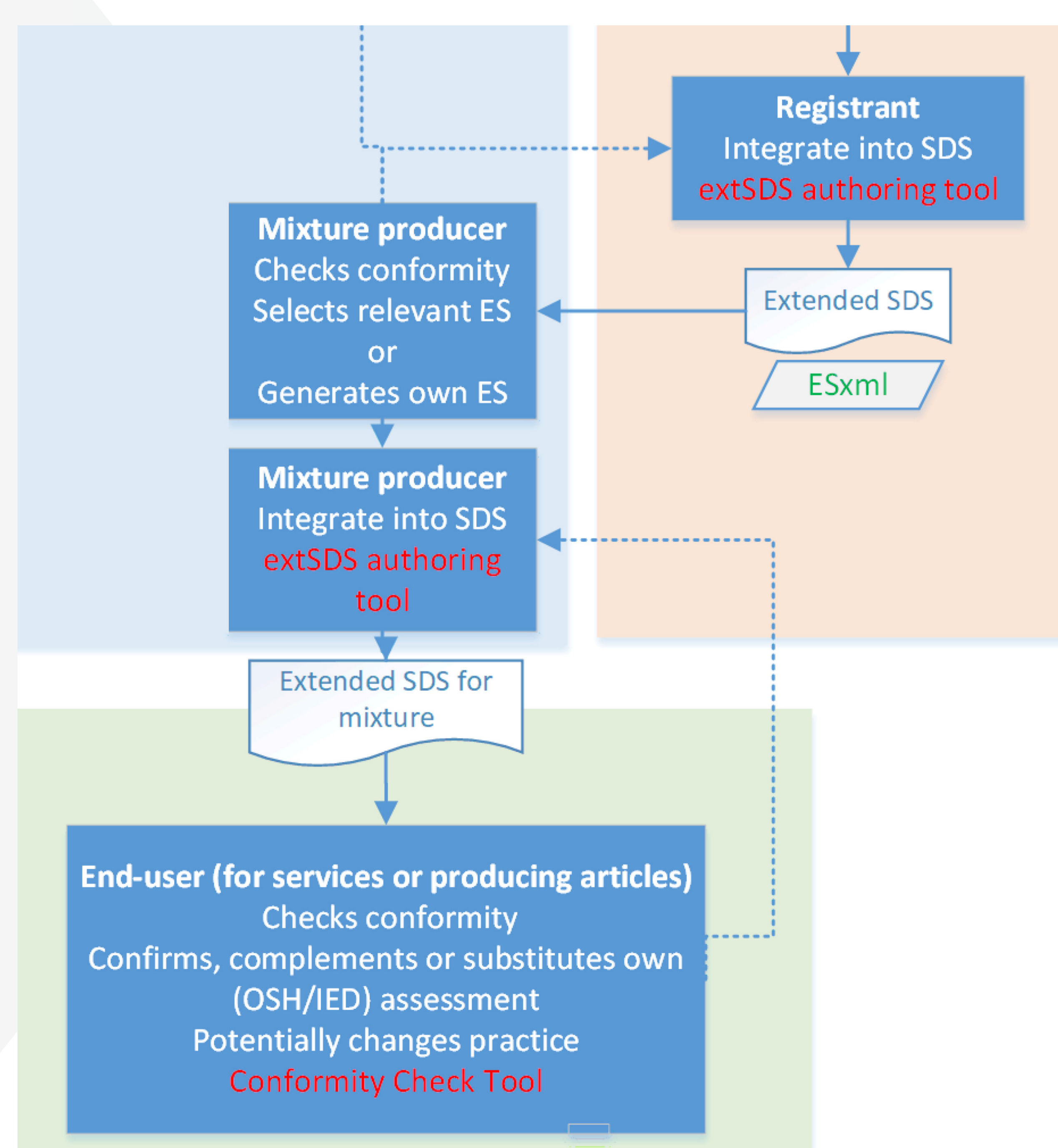ESCom (phrase catalogue, XML)

Formulator

Workers end users

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

Registrant
Run CSA based on substance data
Tool Chesar

IUCLID

CSR xml / CSR

ESxml / ES Document

Registrant
Integrate into SDS
extSDS authoring tool

Extended SDS

ESxml

Mixture producer
Checks conformity
Selects relevant ES or Generates own ES

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
- 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)
  - 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

Registrant
Integrate into SDS
extSDS authoring tool

Extended SDS

ESxml

Mixture producer
Checks conformity
Selects relevant ES or Generates own ES

Mixture producer
Integrate into SDS
extSDS authoring tool

Extended SDS for mixture

End-user (for services or producing articles)
Checks conformity
Confirms, complements or substitutes own (OSH/IED) assessment
Potentially changes practice
Conformity Check Tool

Discussion items

- 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
- Can the ESCom XML standard be a potential solution with ES filled 100% with standard phrases
- How can the distribution of electronic eSDS be facilitated, and is it needed
  - Identify solutions for provision of electronic / interactive SDS