

Downstream user Chemical Safety Assessments

Bridget Ginnity
Senior Scientific Officer
Risk Management

23 April, 2012
11:00 - 13:00 Helsinki Time (GMT +2)

Downstream User Chemical Safety Reports

- Preparing a DU Chemical Safety Report
- Reporting to ECHA



Downstream User Chemical Safety Reports



What it's not:

As extensive as a registrant's chemical safety report

What it is:

A report of the chemical safety assessment for the use not covered. You can use the hazard assessment of the registrant (DNEL's/PNEC's etc.)

DU Chemical Safety Report – Possible Approaches

- Chemical risk assessments already undertaken at your site
- Personal exposure or environmental emissions measurements undertaken for the activity/process category of interest or similar tasks
- Exposure estimation using a modelling tool such as:
 - Ecetoc TRA
 - Stoffenmanager
 - Advanced Reach Tool (ART)
 - EUSES
 - ConsExpo
- Determination of appropriate control measures using control band based tools such as:
 - COSHH Essentials
 - EMKG / ILO
- Generic CSA's undertaken by your sector organisation as part of the development of generic exposure scenarios

Reporting to ECHA

When you need to report

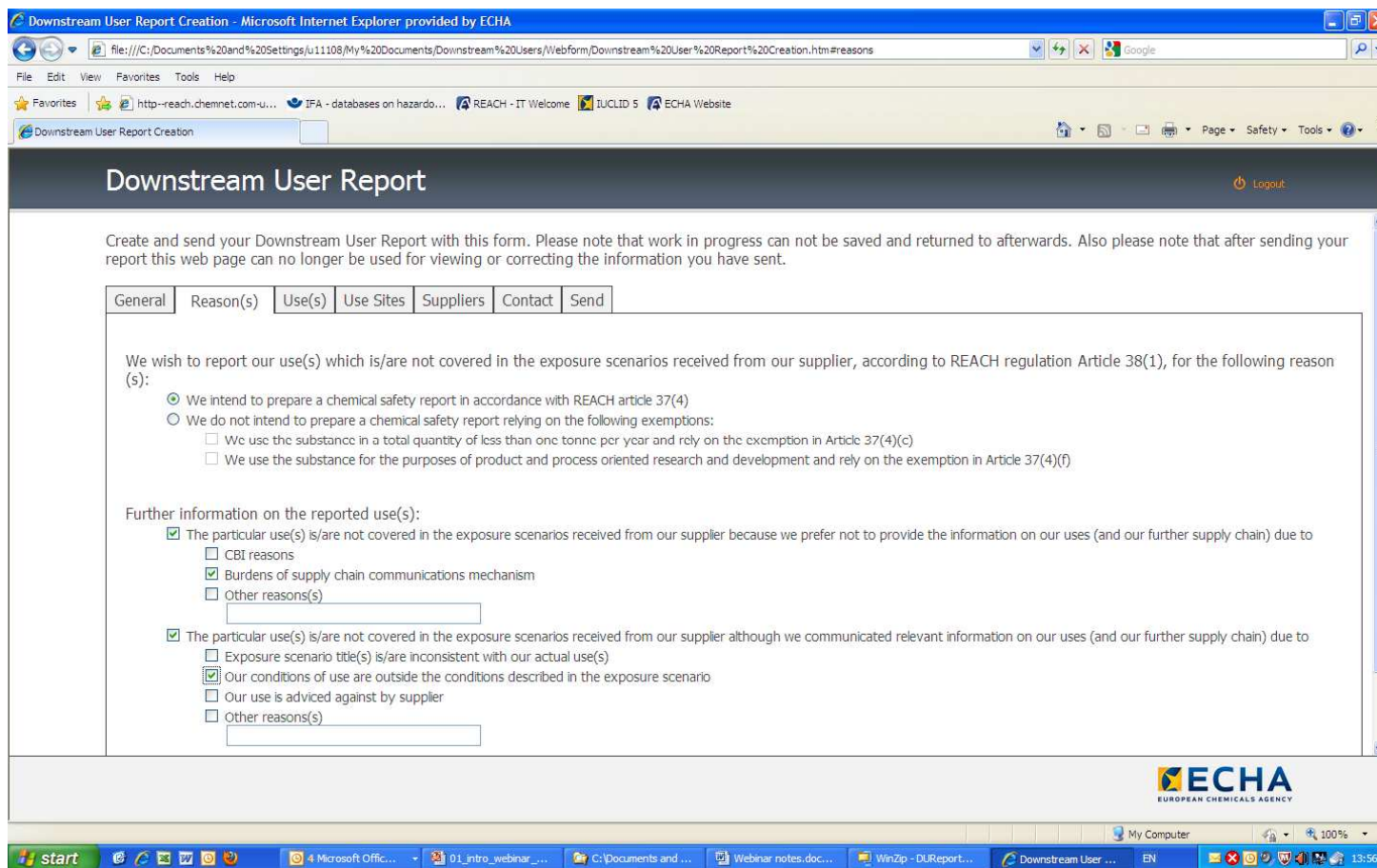
- Preparing a Downstream User chemical safety report
- Claiming an exemption
 - Total use of substance <1 tonne/year
 - Substance used for PPORD (Process and Product Oriented Research & Development)
- Classification of substance differs to the supplier

REACH Article 38

How to report

- Webform to be released shortly
- Submitting a IUCLID dossier via REACH-IT

Reporting Format



Downstream User Report Creation - Microsoft Internet Explorer provided by ECHA

file:///C:/Documents%20and%20Settings/ju11108/My%20Documents/Downstream%20Users/Webform/Downstream%20User%20Report%20Creation.htm#reasons

File Edit View Favorites Tools Help

Downstream User Report Creation

Downstream User Report

Create and send your Downstream User Report with this form. Please note that work in progress can not be saved and returned to afterwards. Also please note that after sending your report this web page can no longer be used for viewing or correcting the information you have sent.

General Reason(s) Use(s) Use Sites Suppliers Contact Send

We wish to report our use(s) which is/are not covered in the exposure scenarios received from our supplier, according to REACH regulation Article 38(1), for the following reason(s):

- We intend to prepare a chemical safety report in accordance with REACH article 37(4)
- We do not intend to prepare a chemical safety report relying on the following exemptions:
 - We use the substance in a total quantity of less than one tonne per year and rely on the exemption in Article 37(4)(c)
 - We use the substance for the purposes of product and process oriented research and development and rely on the exemption in Article 37(4)(f)

Further information on the reported use(s):

- The particular use(s) is/are not covered in the exposure scenarios received from our supplier because we prefer not to provide the information on our uses (and our further supply chain) due to
 - CBI reasons
 - Burdens of supply chain communications mechanism
 - Other reasons(s)
- The particular use(s) is/are not covered in the exposure scenarios received from our supplier although we communicated relevant information on our uses (and our further supply chain) due to
 - Exposure scenario title(s) is/are inconsistent with our actual use(s)
 - Our conditions of use are outside the conditions described in the exposure scenario
 - Our use is advised against by supplier
 - Other reasons(s)

ECHA
EUROPEAN CHEMICALS AGENCY

To be available on the downstream user pages of ECHA's website from mid 2012

