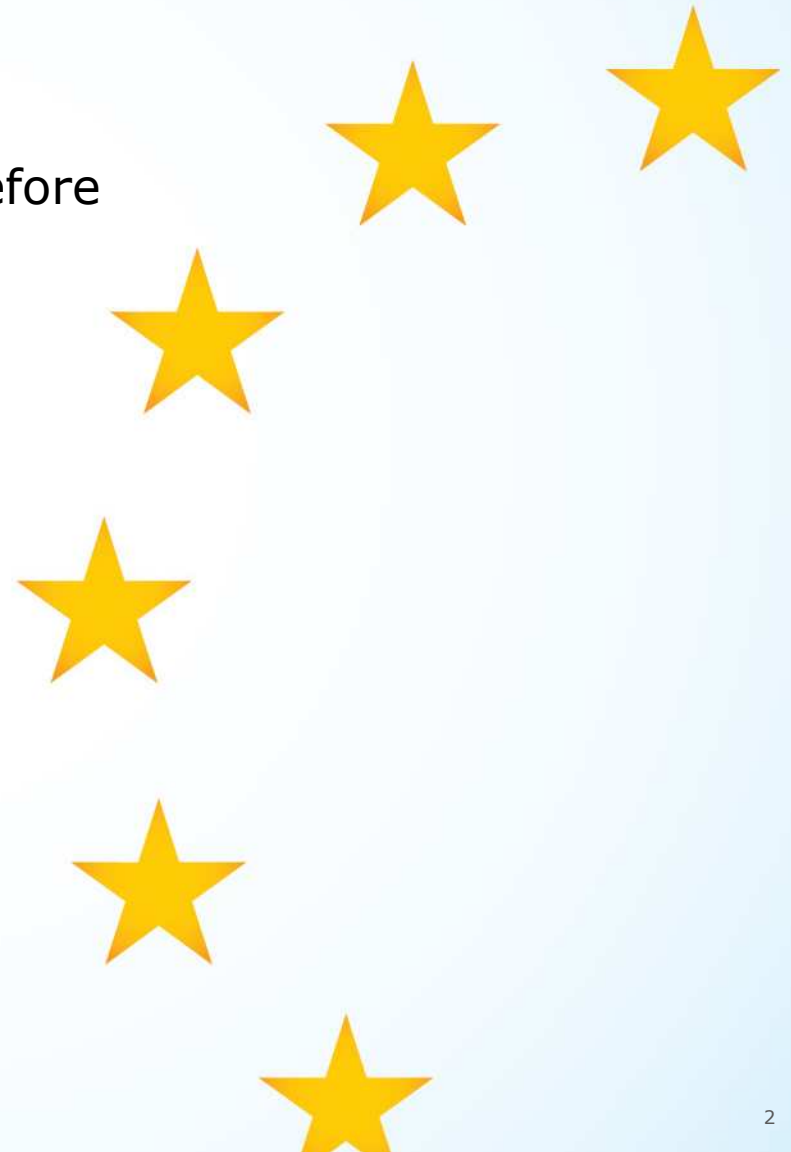**ECHA**
EUROPEAN CHEMICALS AGENCY

Communication for the next registration deadline

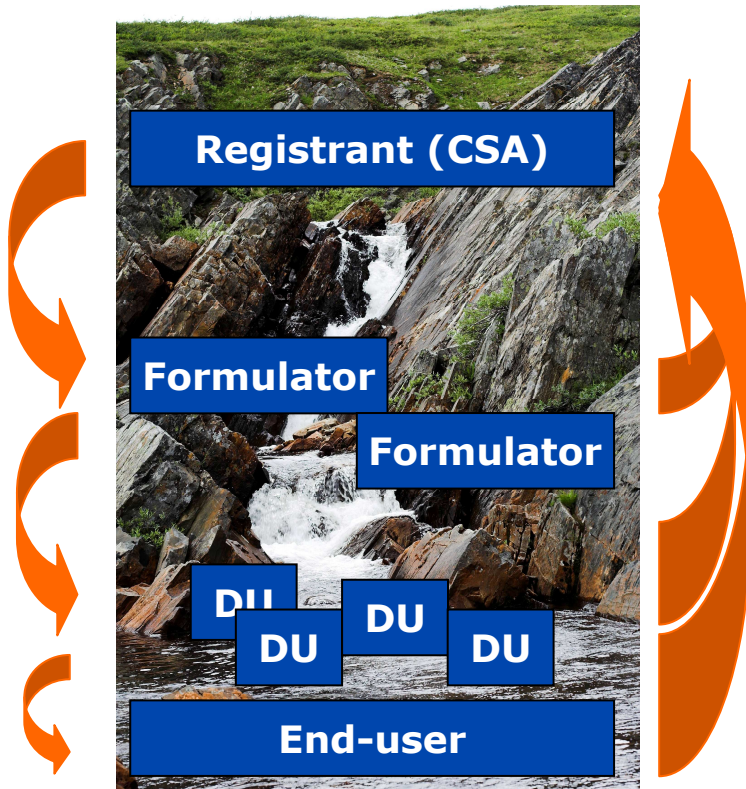**Laura Walin**
Junior Scientific Officer
Registration

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

Communication for the next registration deadline

- Informing registrants of your uses before the next registration deadline
- Use descriptor system
- Examples of what to report on use

Communication in the supply chain – Key to the success of REACH

Registrant (CSA)

Formulator

Formulator

DU

DU

DU

DU

End-user

- Over 5000 substances registered – chemical safety information gathered by the registrants

- Pass information on safe use down the supply chain

Communicating about downstream uses for registrants of 2013

- Communication between registrant and downstream user at least one year before the registration deadline (Article 37(3) of REACH)
  - 31 May 2012
  - 31 May 2017

- Downstream user needs to provide adequate information for exposure scenario preparation

- The registrant can:
  - Include the use in their CSA/registration
  - Conclude – based on the CSA – it is a use that they advise against
  - Not to include it in their CSA for business reasons

Reporting uses for 2013 registrations

- Lesson learnt from 2010: Top-down approach recommended by industry associations

- Registrants – in cooperation with their customers - to actively communicate which uses they intend to cover
  - Intuitive, concrete description of the use
  - Assign use descriptors

- Sources for downstream users to check
  - Supplier's website
  - Section 1 of the current SDS
  - Other technical information from the supplier
  - Use mapping by own sector association

Reporting uses for 2013 registrations

- If use not found, substance-specific communication upstream
  - Make use of available standard formats (templates)
  - Make use of standardised, sector-specific description of relevant uses
  - Link sector-specific use description to the relevant elements of the use descriptor system
  - Describe conditions of use

- This process should take place by mid-2012

What to report on use – Use descriptor system

Main user group	Industrial, professional, consumer
Specific sector of use (SU)	Sector of industry where use of substance/mixture takes place
Product category (PC)	Type of mixtures in which substance is used (cleaners, lubricants, coatings…)
Process category (PROC)	Application techniques/process types having direct impact on worker exposure
Environmental release category (ERC)	Reflects six use characteristics determining release to the environment
Article category (AC)	Type of article in which substance is used

Condition of use (worker) - Examples

- Frequency and duration of exposure
- Physical state of product, e.g. particle size, viscosity
- Concentration of substance in a mixture
- Amount used at a workplace
- Type of process carried out with the substance
- Level of containment or local exhaust ventilation
- General ventilation and room volume before inhalation
- Personal respiratory protection
- Skin contact area and personal skin protection

Conditions of use (environment) - Examples

- Daily and annual tonnage used at generic sites
- Daily and annual tonnage in wide disperse use
- Process conditions driving the initial release
- Onsite risk management measures (with certain effectiveness)
- Flow rate of local sewage treatment plant

Conditions of use (consumer) - examples

- Type of product
- Concentration of substance in the product
- Conditions inherently related to the product type
  - Number of events (product uses) per day
  - Amount of product per event
  - Duration of exposure
  - Room size and ventilation conditions
  - Skin surface exposed
  - Relevance of oral contact

Key messages for use communication before registration deadline

- Top-down approach recommended

- If downstream user reports to their supplier, only relevant uses to be reported

- Combination of three elements
  - Brief sector-specific technical description (name/description of use)
  - Use descriptors
  - Conditions of use

- Use the available templates for communication

Thank you

Laura Walin
info@echa.europa.eu