

# The description of “uses applied for”

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# Part I

## Definitions

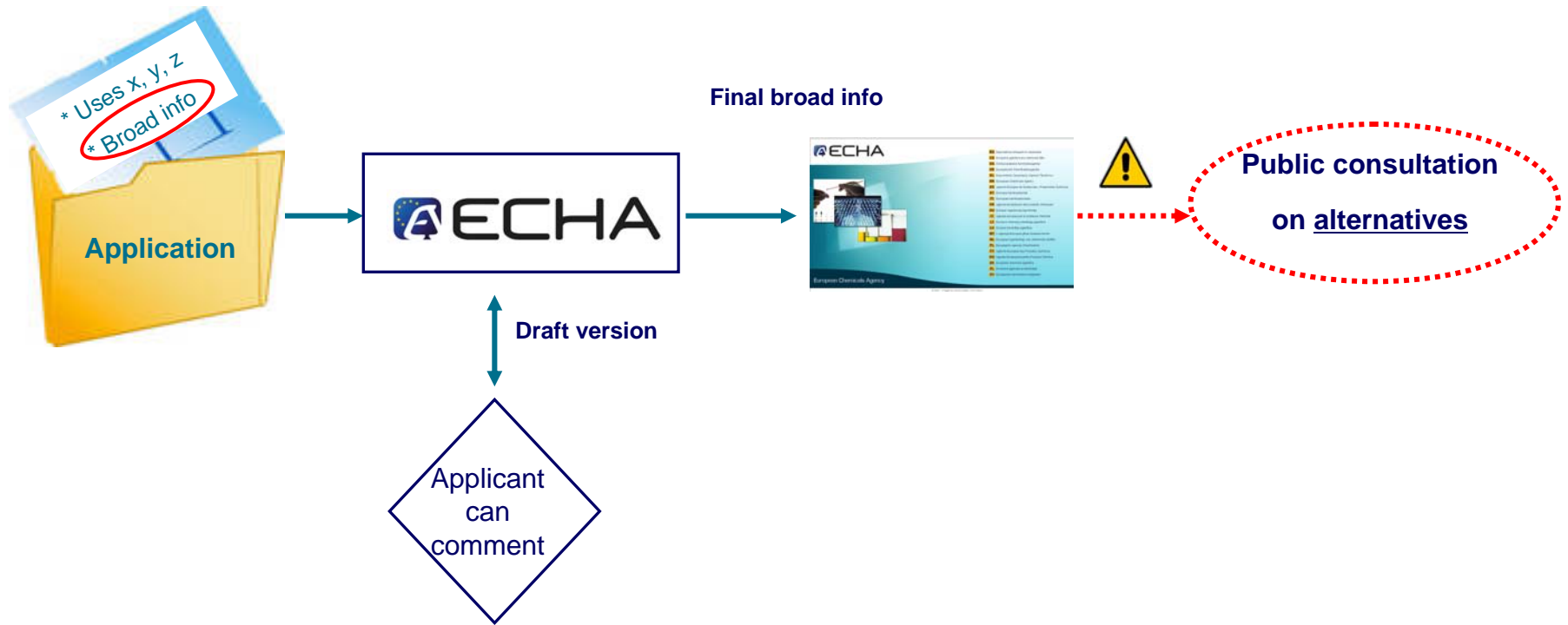
## Definitions (1/5)

- Article 3 (24): *“Use: means any processing, formulation, consumption, storage, keeping, treatment, filling into containers, transfer from one container to another, mixing, production of an article or any other utilisation;”*

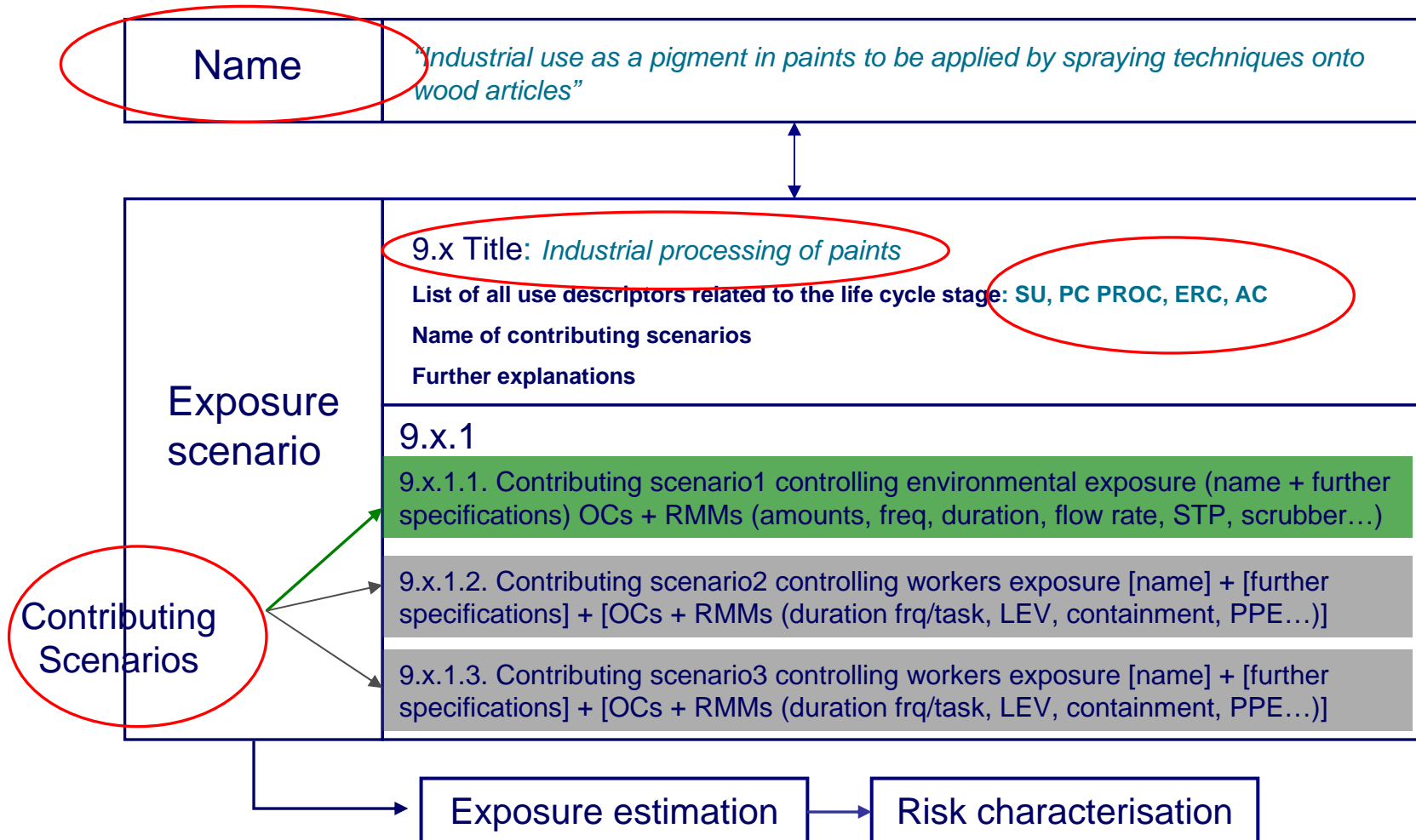


- **Identified use**
  - as defined in Article 3 (26) and referred in section 3.5 of Annex VI
  - described in the registration dossiers
- **Use applied for**
  - the use for which the authorisation is granted [Article 60(9)(c)]
- **Broad information on uses [Article 64(2)]**
  - Covers the “uses applied for”
  - Published on ECHA’s web-site for public consultation
  - Get from third parties information on alternatives
  - Collected information considered by RAC/SEAC in their opinions

# Definitions (3/5)



## USE APPLIED FOR



- A use description can be characterised by:
  - Its scope: the area of use covering a number of:
    - Market sectors (textile, mining, agriculture...)
    - Processes/activities (mixing, spraying, calendaring...)
    - Chemical products/articles categories (adhesives, furniture...)
    - Life-cycle stages
  - Its level of detail: the precision of the information contained
    - in the name of the uses applied for (including elements that highlight certain conditions of use)
    - in the exposure scenarios (conditions determining exposure + technical explanations/specifications)
-



## Part II

### Use descriptor system

- Applicants can describe their uses according to the Use Descriptor System (Chapter R12 of the CSA guidance)
  - **SU**: Sector of end-use (manufacture of textiles, wood products...)
  - **PC**: Product Category (paints/coatings, adhesives ...)
  - **PROC**: Process Category; (mixing, spraying...)
  - **ERC**: Environmental Release Category (formulation, use of process aids...)
  - **AC**: Article Category (wood, plastic, paper, rubber...)
  - **Function**: (lubricant, softener...)
- More specific sub-categories available
  - **NACE** codes for **SU**: manufacture of **kitchen** furniture (C31.0.2)
  - **Consexpo** categories for **PC**: **solvent-rich** paint, **waterborne** paints
  - **TARIC** chapters for **AC** : wood articles → plywood, veneer panels (4412 )

- **Practical advantages**
  - Harmonisation/standardisation
  - Wording blocks to build up a use name
  - Links between the use name and the ES, EE, RC
  - TIER1 input parameters to exposure estimation tools (Ecetoc TRA, ConsExpo, EUSES...)
  - Compatible with the CSA software (CHESAR)
- **ECHA recommends them for the description of uses applied for**

- Level of detail of descriptors not always sufficient for a comprehensive description of a “use applied for”
  - Applicants can include as free text (in the use name and ES), more precise information
  - [SU3, PROC7, ERC5, AC11] *“Industrial use as a **UV-resistant pigment** in **water-borne** paints to be applied by **HVLP** spraying techniques onto wood articles **furniture**”*
  - Subcategories can be helpful
- Might not be adapted to certain specific processes or substances (industry feedback is welcome)

## Part III

**Application structured by “use applied for”**

### Multi-uses applications may contain information widely dispersed in bulky assessment reports

Article 62 (4) (c)

**List of Uses**  
(Use1, 2, 3, ...)

Article 62 (4) (d)

**CSR/ESs**  
(ESa, b, c, ...)

Article 62 (4) (e)

**AoA**  
(AoAx, y, z, ...)

Article 62 (4) (f)

**SP**  
(SPi, j, k,...)

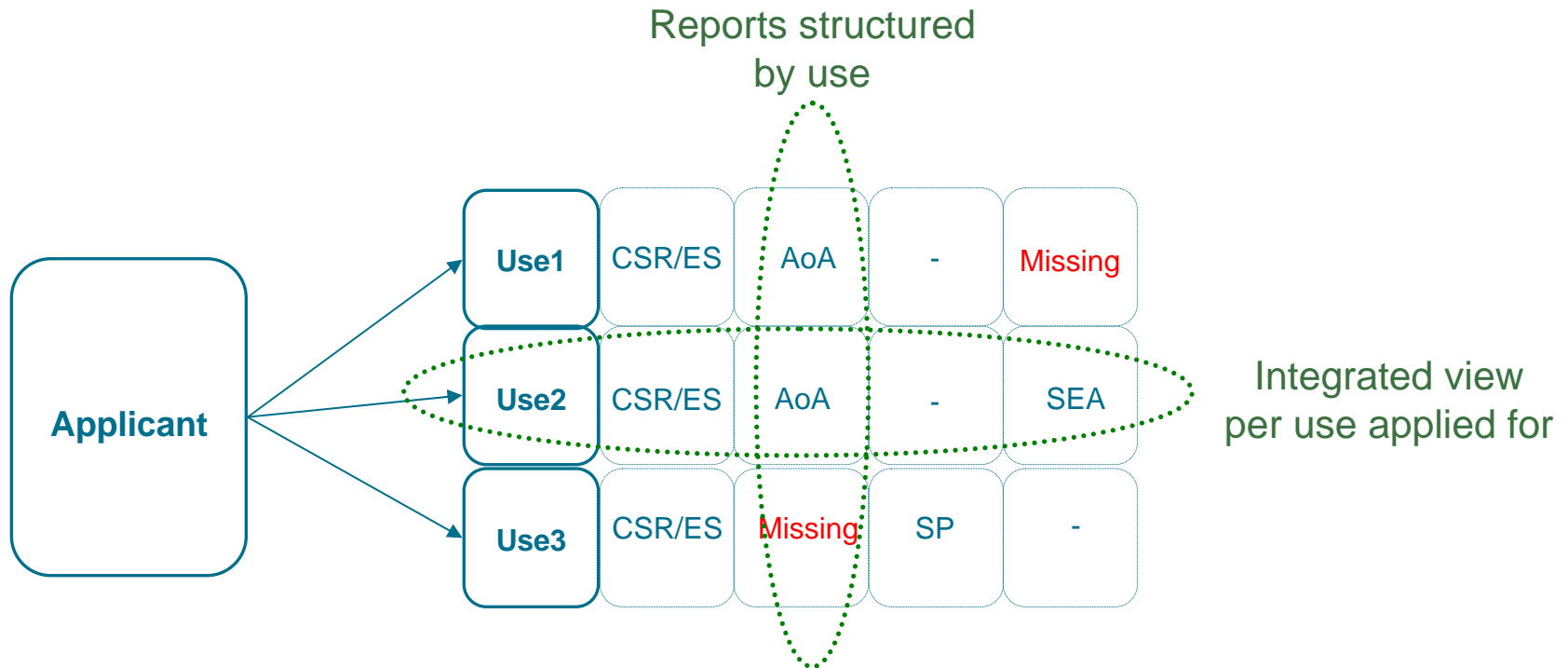
Article 62 (5) (a)

**SEA**  
(SEA  $\alpha$ ,  $\beta$ ,  $\gamma$  ...)

### Risks / Pitfalls

- Not all the required information has been documented
- No integrated view per “use applied for”

## Application structured by use (2/2)



## Part IV

### Development of a “use applied for”



- **Authorisation context has some peculiarities**
    - Substances of Very High Concern
    - To be progressively replaced by suitable alternatives
    - Technical and economical criteria
    - Risk comparison criteria
    - Socio-economic criteria
  
  - **These analysis to be documented in ‘new’ assessments reports**
    - Analysis of alternatives
    - Substitution plan
    - Socio-Economic Analysis
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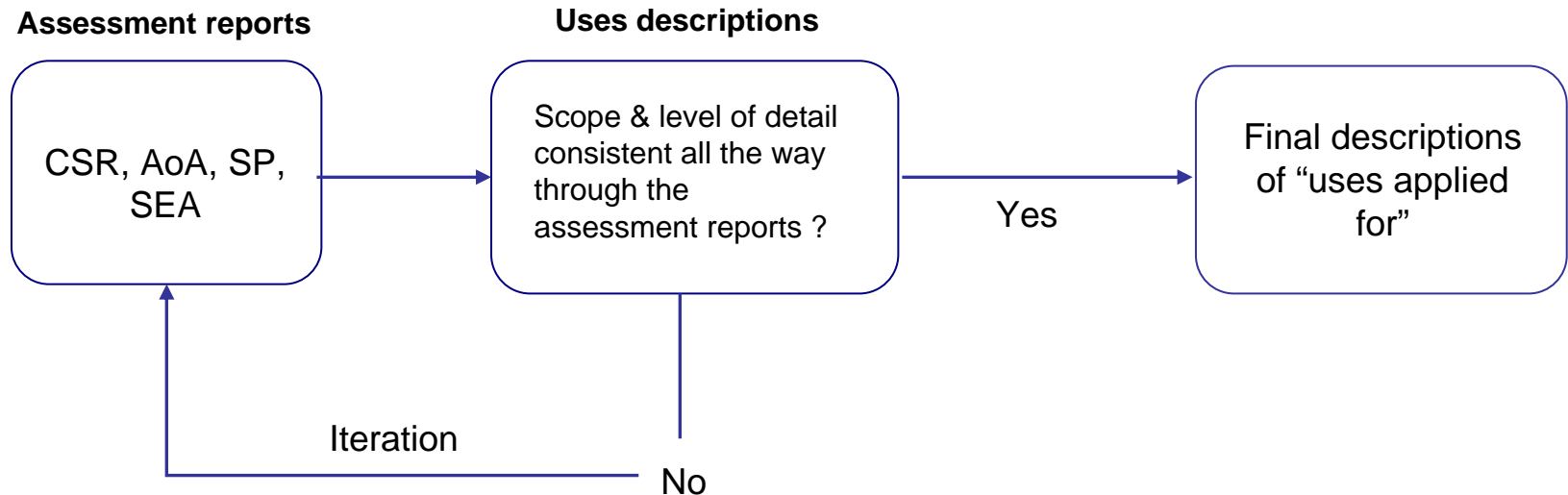
- Approach taken for the Registration of wide use patterns substances
    - CSA performed at the highest level of the supply chain → wide coverage from the top to the bottom.
    - Impractical to prepare a large number of detailed and specific uses descriptions
    - More advantageous to group uses in a smaller number of generic exposure scenarios
  - “Identified uses” as described in registration dossiers are a very good basis for the development of “uses applied for”
    - constitute an initial list of “uses applied for”
    - safe use, minimisation of exposures/risks already documented
-

## Development “use applied for” (3/4)

- Description of “identified uses” might benefit to be refined and/or consolidated under some circumstances
  - not all identified uses are of interest for authorisation
  - new potential uses to be started only if granted
  - suitable alternatives available in some areas of use
  - applicant wishes to provide more precise information
  
- Refinement on the overall emissions and RC from remaining/additional uses

## Development “use applied for” (4/4)

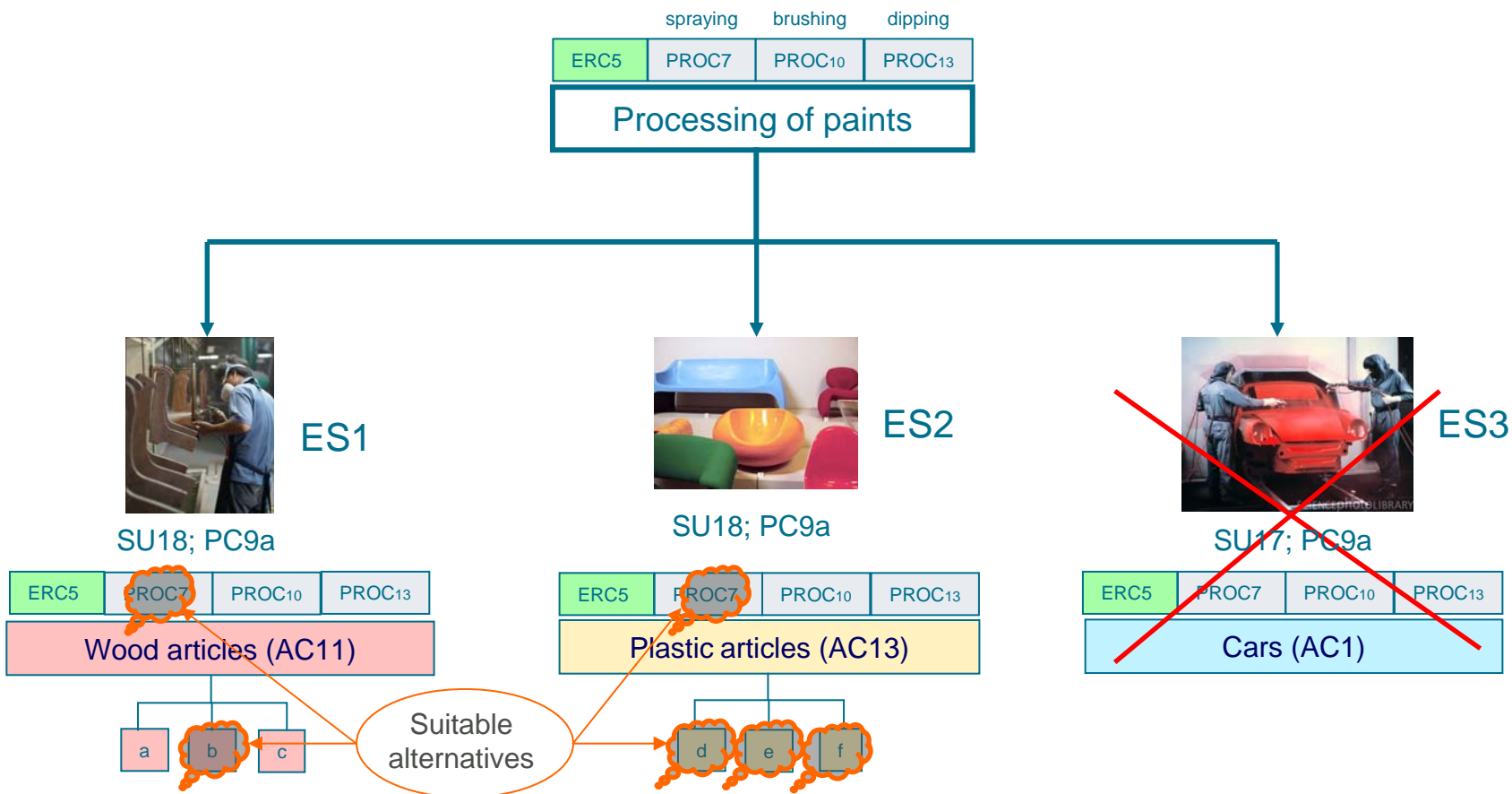
- Use description to be finalised after the work on the CSR, AoA, SEA has been carried out → Iterative process



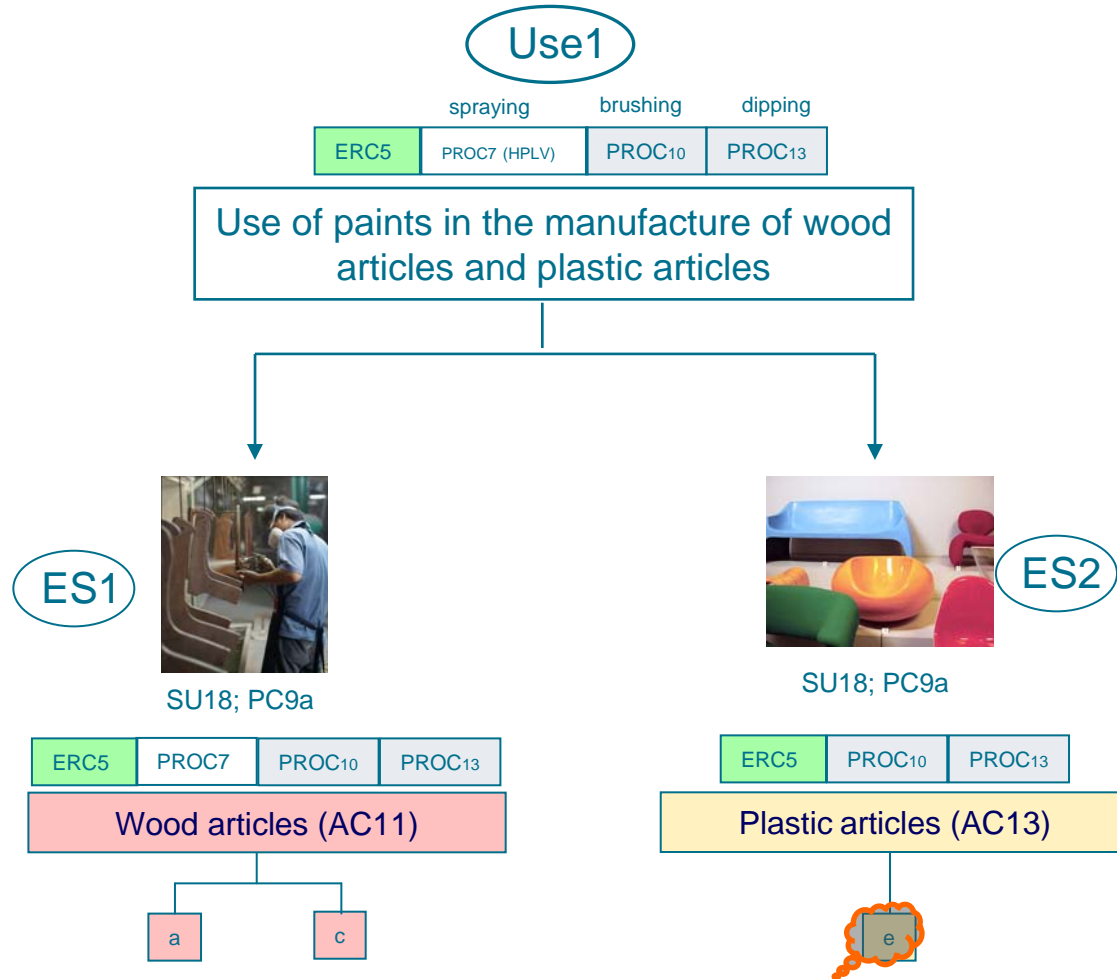
- Work on AoA important for the initiation of the iterative process

# Examples (1/3)

- One use may take place under different conditions in different market sectors → covered by several generic exposure scenarios



# Examples (2/3)



# Examples (3/3)

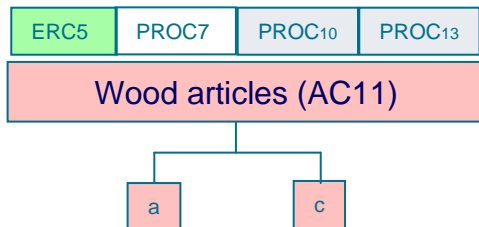
## Use1

Use of paints to be applied by HPLV spraying, brushing and dipping onto wood articles



SU18; PC9a

## ES1



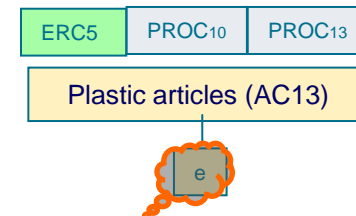
## Use2

Use of paints to be applied by brushing and dipping onto plastic articles



SU18; PC9a

## ES2



## Descriptions with adapted level of detail and scope

### Pros

- Better clarity and readability of the information → quality
- More solid basis for opinion/decision making
- Minimised risks of restrictive conditions
- Sustain specific comparisons with alternatives

### Cons

- Less extensive coverage of the uses within the supply chains
- Further analysis



# Conclusions (1/2)

- Don't wait and get prepared well in advance
- Start discussions within your supply chains (downstream users may provide info on alternatives and can apply on their own)
- Provide precise, comprehensive and consistent information structured by use all the way through the assessment reports

## Conclusions (2/2)

- Descriptor system is recommended to be used whenever appropriate. Function is an important element
- Original (generic) descriptions of uses might benefit to be refined/consolidated
- Work done during registration = a very good basis for the preparation of applications for authorisation