



Retrofit Design of Generic Exposure Scenarios for Substances in Complex Mixtures

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Due to some controverse discussions, it is necessary to emphasize the obligation under REACH to communicate results of exposure assessments to industrial and professional end-users, even for substances in mixtures and even if generation of an SDS may not be mandatory.

The presentation describes three options to comply with this obligation.

Option A : Generation of group exposure scenarios for products with similar composition

Option B : Consolidated exposure assessment for substances in mixtures based on focussed application of ECETOC TRA algorithms, DPD+ and expert judgment

Option C : Inverse calculation from safe use conditions ($R_{CR} \leq 1$) back to tolerable DNELs for substances used in mixtures

For coatings, option C might cover about 90 % of all practical cases and be in line with expectations from end-users' business associations. Option B may be pursued for specific cases with unusual restrictions, imported substances, comprehensive scaling needs and substances with need for downstream user chemical safety assessment.

Assignment to option B or C may be influenced by political decisions about the border between scaling and DU CSA.

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