



Downstream Users of Chemicals Co-ordination group

Extended-SDS

Harmonising the format of the Table of Content (ES overview)

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Background: Conclusion ENES 2



Downstream Users of Chemicals Co-ordination group

Registrant

- **Insert a table of content** of ES at the beginning of SDS annex: overview of exposure scenarios

Authorities/
Industry

- Develop a **harmonised format** for such a table of content
 - List of ES short titles, structured according to life-cycle stages and user groups: selected use descriptors
 - Easily 'recognisable' by DU

DU

- **The DU should be able, using his own sector's use mappings, to recognise the applicable ES from the table of content**

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Examples of ES overviews from existing extended SDS



Table 1 Short description of all exposure scenarios with their use descriptors and life cycle stage

Short description of Exposure scenario	Life Cycle Stage(s)						Use descriptors		
	Manufacture	Formulation	End use			Sector of Use (SU)	Process Category (PROC)	Product Category (PC)	Environmental Release Category (ERC)
			Industrial	Professional	Consumer				
1. Manufacture of substance	x					SU 8	PROC 4, 8a, 9	NA	ERC1
2. Professional use of washing and cleaning products				x		SU22	PROC10	NA	ERC8a
3. Consumer use of washing and cleaning products					x	SU21	NA	PC35	ERC 8a

9. Short title of exposure scenario

Use in/as Laundry agents, Use in Cleaning Agents

SU3; SU3, SU22; ERC8d; PROC3, PROC7, PROC8a, PROC10, PROC11, PROC13, PROC19; PC35

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Examples of ES overviews from existing extended SDS



ES number

3	Formulation & (Re)packing of Substances and Mixtures – Industrial
4	Uses in Coatings – Industrial
5	Uses in Coatings – Professional
6	Uses in Coatings – Consumer
7	Uses in Cleaning Agents – Industrial
8	Uses in Cleaning Agents – Professional
9	Uses in Cleaning Agents – Consumer

1. Overview of exposure scenarios

ES number	ES-Code	Bezeichnung des Szenarios
2.1	AISE-M5.4, AISE-M7.4, AISE-M4.4, AISE-M9.4, AISE-M2.4, AISE-M3.4, AISE-M8.4, AISE-M6.4, AISE-M1.4	AISE - Formulation of Detergents/Maintenance Products: Granular Detergent - Compact (large scale)
2.2	AISE-M5.5, AISE-M2.5, AISE-M3.5, AISE-M1.5, AISE-M8.5, AISE-M4.5, AISE-M9.5, AISE-M6.5, AISE-M7.5	AISE - Formulation of Detergents/Maintenance Products: Granular Detergent - Compact (medium scale)

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Prerequisites to a harmonised ToC



- Application of basic principles related to **ES development and ES structure** (ENES 2)
 - Build ES around life-cycle stages and user group
 - Describe uses with ECHA's use descriptors
 - Contributing scenarios (e.g. based on PROC, or ERC) fit within one broader ES
- Intuitive, meaningful **ES short titles**
- ES titles correlated with **DU use mappings**
- Compatible with **Chesar** (output) and IUCLID 5

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Proposed principles



- **The table of content consists of a synthetic list of uses, expressed as short titles**, covered in the substance registration
- Short-titles follow a specific structure (building on IR/CSA guidance, Chapter R12, on use descriptors)
- The content is expressed with standard phrases and codes, as much as possible
- It enables **electronic exchange of information**, all along the supply chain, on identified uses

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Proposal



Title: 'Overview of Exposure Scenarios'

Mandatory part:

ES# + LIFE CYCLE STAGE + USE NAME/LABEL + PC (if available)

Optional elements (informative): PC/market sector name, SU / SU name, AC / AC name, substance form

Not recommended: long list of contributing scenarios e.g. list of PROCs or ERCs (those should be listed in the ES title section 1).

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Proposal: mandatory part of the ES title



ES#: incremental

Life Cycle Stage: one of the following

* IUCLID 5 / Chesar

- **Manufacture** (of substance, usually not communicated downstream)
 - **Formulation**
 - 'Industrial workers end-use' or 'Use at industrial site' *
 - 'Professional workers end-use' or 'Use by professional worker' *
 - **Consumer use (or end-use?)**
 - 'Service life by industrial workers' or 'Service life (worker at industrial site)'
 - 'Service life by professional workers' or 'Service life (professional worker)'
 - 'Service life by consumers' or 'Service life (consumer)'

Note: SU3, SU10, SU21, SU22 not needed in the ES overview if life-cycle stage chosen from the above list

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Proposal: mandatory part of the ES title



Use name / use label: intuitive, standard phrases

- **Market sector:** PC name + SU name if appropriate and useful, or
- **Short ES title from DU use mappings,** if available as a standard phrase (e.g. ESCOM phrase library?): should reflect the market sector name
- Specific case:
 - 'Repacking' of substance or mixtures: same life-cycle stage as 'Formulation' needs to be specified in the use name (e.g. if no mixing, or as SU10).

PC: use descriptor code (ECHA guidance R12), to be added

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Proposal: optional part of the ES title (if relevant and informative)



PC/market sector name: if not contained in the ES short title

SU / SU name: Use descriptor code and/or name for Sector of Use, as applicable

AC / AC name: Use descriptor code and/or name for Article Category, as applicable

Substance form: gas/liquid/solid, as applicable

Other?

- Note: sector code (from DU use mapping table), e.g. AISE_P102, AP0103 (CEPE), should be reported in ES section 1, instead of ES overview

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Examples: applyign above proposal to existing extended-SDS



- **ES1** - Formulation and repacking of substance and mixtures (PC)
- **ES2** - Use by professional worker, coatings and paints, coating of floors, outdoor/indoor, PC9a
- **ES3** - Consumer use, Use in concrete and cement, PC9b (SU19: building and construction work)
- **ES4** – Use by professional worker, Use as a Process chemical, Production of paper, Use in Textile finishing, Use in leather tanning, finishing, impregnation, PC 18, 23, 26, 34.
- **ES5** – Consumer use, Cleaning agents, PC3, 4, 8, 9, 24, 35, 38
- **ES6** - Use at industrial site, Cleaning products and other mixtures, PC 8, 14, 15, 20, 25, 34, 35, 36, 37, 39.
- **ES7** – Use at industrial site, glass production.
- **ES8** – Use at industrial site, Use as an intermediate, PC19

ES#, Life cycle stage, use name, PC (optional information)

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Other information that should be part of the SDS annex (e.g. header)



- Reference to Regulation (EC) No 1907/2006
- Company name (legal entity, same as in SDS)
- Substance name (same as in SDS)
- EC number
- Registration number
- SDS Version number (same as in SDS)
- Date

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Towards more harmonisation



- The ES Table of Content will
 - facilitate the tasks of DUs: sorting out and understanding of ES
 - allow comparing ES scope between different suppliers
 - support communication in the supply chain on identified uses
 - be IT-processable (consist of standard phrases) and compatible with existing IT-tools and libraries
 - facilitate enforcement activities
 - save time to all parties
- This approach would enable communication of **identified uses for mixtures** (without mandatory ES#)

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Next steps



- Organise feedback on specific aspects of the above proposal: by year-end
- Consider IT implementation aspects (compatibility with companies' e-SDS softwares)
- Establish the proposal as a harmonised solution: 1Q2013

- **A harmonised format building on the above proposal should be agreed as soon as possible** (before ext-SDS from 2013 registrations are sent out)

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