

The future: the CSA/CSR/ES Roadmap

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ECHA's observations on CSR & exposure scenarios

- From
 - Compliance checks of CSRs
(*Evaluation under REACH Progress Report 2011*)
 - Screening of CSRs
 - Interaction with Member States and industry (e.g. ENES)
 - Observations
 - Quality
 - Unclear which processes covered
 - Risk management measures and operational conditions are generic or too restrictive
 - Lack of standards: Structure, format, language (risk phrases)
 - Concept of scaling and its applicability
 - Communication on the safe use of mixtures – how to approach.
- Proposal to develop a Roadmap with all stakeholders presented to Caracal in March 2012.
- ENES2 informed at May meeting.

Roadmap – what would be the content?

- Cross-stakeholder Roadmap to ensure accuracy and clarity in CSAs to support safe manufacture and use of chemicals:
 - Shared vision on the elements of good quality CSR/exposure scenario
 - Current state-of-play: an analysis
 - Logical steps and phases to the desired level of accuracy and clarity
 - Means to achieve vision
 - Timing
 - Roles and tasks of the different actors

Roadmap Coordination Group established

- Nominations in August 2012
 - 8 MSCAs: AT, DE, DK, ES, IT, NL, PL, UK
 - 3 industry associations: Cefic, Concawe, DUCC
 - ECHA
- Autumn 2012
 - Organisation of the group.
 - Terms of Reference: *“setting out an action plan on how to improve the generation and communication of accurate and clear information in chemical safety reports and exposure scenarios.”*
 - *Analysis: strengths & weaknesses, essential information needs, gap analysis;*
 - *Action plan: activities for further action; solutions proposed; actors identified.*
 - *Facilitate consultation with stakeholders: networkers, gain understanding.*
 - Draft Discussion Document prepared by ECHA.
 - First commenting round of the Coordination Group.

Aim of the draft Discussion Document

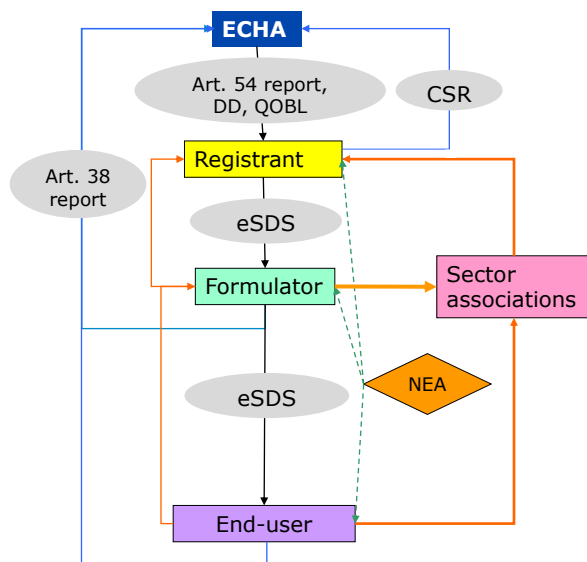
- Set the scene – thought starter (from ECHA’s perspective)
- Harvest feedback from stakeholders
- Cover all CSA/CSR issues on a high level as a basis for a more detailed action plan

- Basis for explaining the process at ENES3

Chapter 1 - Introduction

- Legislative framework
- Overview of information flows in the supply chain
- Recognising variety of supply chain types
- Recognising ambitious deadlines of REACH and the potential to improve implementation over time

Processing CSA information in the supply chain



Chapter 2 – Desired information quality

1. Information for registrants on uses and conditions of use downstream.
2. Information for formulators for mixtures.
 1. Own mixing and blending processes
 2. Information on mixtures supplied further downstream
3. Information for industrial end-users.
4. Information for professional end-users.
5. Information on uses and conditions of use for ECHA/MSCA.

Elements of sub-chapters 2.x

- Purpose of the information
- Observations on the current state-of-play
 - Achievements
 - Shortcomings – with identified root causes
- Consequences – if the current state prevails
- Goal
- Solutions

- Chapter 3. Action/means to move towards goal
 - Objective, Action, Beneficiary, Deliverables, Timeframe, Indicators
- Chapter 4. Roadmap and milestones.
 - Rolling action plan
 - Tool for common orientation on how different work processes feed each other

Comments from the Coordination Group

- 8 organisations have already provided comments, 3 more still to comment
- Draft discussion document has already stimulated ideas and potential solutions.
- Comments provide a basis for fruitful further work

Comment type	# comments
Scope	4
Structure	7
ECHA's analysis	47
Content issue	19
Wording	33
Legal interpretation	2
Action proposal	15
Comment	6
Agreement	4
TOTAL	137

For instance....

- Analysis
 - Reference to shortcomings not disproportionate to achievement; isolated problems vs systemic failings; absence of waste stage from life cycle, awareness of end-users (chemicals process vs "abstract" PROC)
 - Relationship between lead registrant (CSR generation) and members (eSDS)
- Content
 - information leads to inherently safer use or products for professional users
- Action proposals
 - Multiple sector specific activities.
 - Cases of substitution documented.
 - Mixtures: sector / product specific guidance to consolidate ES information on substances to mixtures.
 - Principles on how to integrate stepwise substance information to existing SDS systems (including for mixtures).
 - Registrants describe meaningful uses.
 - Guidance for SMEs on use descriptor system.

Final output of the Roadmap process

- Rolling action plan
 - Synergies across processes identified
 - Gaps between now and “then” defined
 - Required steps identified to get “there”
 - Takes into account activities underway e.g. harmonised formats for reporting uses, ESComXML etc
- Actions defined
 - What
 - When
 - Who is in the lead
- Commitment to the continuous development
 - ECHA foresees a biannual update of the Roadmap

Next steps

- Coordination Group meeting 22 November 2012
- Finalise the discussion document by mid-January 2013
 - Inclusion of specific actions
 - From ENES2
 - As identified during Roadmap development discussions
- Harvesting a wider feedback on the Discussion Document January-February 2013
 - ENES community
 - ECHA’s accredited stakeholder organisations
- Sharing the document with other REACH bodies March 2013
 - CARACAL
 - ECHA Forum
 - HelpNet
- Publication of the Roadmap by summer 2013.

Thank you.

