

ENES3 break-out group 3

CEPE: mixture ES for a coating product
(Jotun)

Break-out session	Case study 3
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Main points discussed

- Approach involves creating an ES annex for the *mixture* (choice, not a legal requirement)
- Uses DPD+ methodology to identify lead substances ('top-down' approach)
 - But can then be used as generic ES for other mixtures with same lead substances ('bottom-up')
- One mechanism (SDS) used to cover different needs
 - Formulators v. end users
 - Regulatory personnel v. site HSE personnel

Applicability of the presented approach

- Boundaries / limitations
 - Does not cover all products, but around 90%
 - DPD+ is hazard-based; CCA may better reflect risk profile
 - DPD+ does not adequately characterise environmental risk as only one lead substance identified
 - Cannot account for substance interactions (within product or with other products used in workplace)
- Pre-conditions to be applicable
 - Need access to substance ES information
 - Need automation to deal with thousands of mixtures, and need to populate a lot of data

Applicability of the presented approach (cont.)

- Comments on the proposed output
 - Presents *relevant* information concisely in one page – positive for the recipient
 - No scaling guidance provided to end user – must either comply with ES or contact paint supplier (scaling already applied; scaling regarded as being of limited usefulness to end users)
 - M_{safe} not communicated (not relevant to user)
 - Identification of substances on which ES is based provides good transparency (does not link with effects)
 - Designed for end users; lacks some information which formulators would need
- Potential improvements
 - Include all information together in one place rather than making cross-references to SDS main body sections

Applicability of the presented approach (cont.)

- Can its principles be applied to the environment?
 - So far not much relevant information available in the supply chain; any *relevant* information would be passed on as received
 - DPD+ alone is not enough to identify environmental Risk Management Measures which may be necessary for substances other than the lead substances

Points identified for further work

Proposed follow-up action	Who should take the lead
Explore CCA as a way to identify the critical hazards of mixtures (link with DNELs/PNECs)	Companies / sector organisations
Test approach with more complex example (>2 risk-determining substances)	Companies / sector organisations
Seek harmonisation of approach (so upstream suppliers know which input data they are expected to communicate)	Sector organisations