



# Supply Chain Communication

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# Content

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- **Information in supply chain**
  - **Communication down the supply chain**
  - **Communication up the supply chain**
  - **Safety Data Sheets**
  - **Substances in articles**
- **Use and Exposure Communication**

# Communication down the supply chain

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- **Manufacturers and Importers of a substance/preparation shall communicate how their substances/preparations can be used in a safe way**
- **Safety Data Sheet (SDS) including Exposure Scenarios (ES) shall specify under which Operational Conditions (OC) and Risk Management Measures (RMM) the substances/preparations can be used in a safe way**
- **If a SDS is not required, the M/I shall communicate key risk information to enable appropriate risk management**
- **Suppliers of articles shall inform their customers about Substances of Very High Concern (SVHC) if > 0.1%**
- **Distributors to pass on information on safe use to their customers**

# Communication up the supply chain

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- **DU has the right to make their use known to their supplier**
- **DU to inform his supplier about inappropriateness of recommended RMM**
- **DU to inform his supplier in case of new information on the hazardous properties of the substance/preparation**
- **Distributors shall pass on the information received from DU to the next actor up in the supply chain**

## **Non-EU companies**

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**Non-EU manufacturers, formulator and article producers have no direct obligation under REACH.**

**It is their Importer or Only Representative, established in the EU, who needs to comply with REACH**

# Safety Data Sheet

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- **When substance/preparation is classified ‘dangerous’, a SDS is obligatory for transmitting safety information**
- **On request of recipient: SDS also for preparations not classified as dangerous but containing SVHC or substances limited on workplace**
- **SDS not obligatory for substance/preparation for general public, but sufficient info to be provided on safe use**
- **No obligation to provide SDS for articles. But if SVHC > 0.1 %, communication on safe use to be provided**

# Safety Data Sheet

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## What is new under REACH?

- Mandatory to annex relevant ES's
- SDS now also for SVHC (PBT, vPvB and candidate list)
- Some changes in the format
- Additional information: e-mail address of the person who is responsible for the SDS, emergency telephone etc
- New format is given in Annex II of REACH regulation
- SDS to be in official language of the MS where the substance is placed on the market
- New provisions apply from 1 June 2007, but transfer period with no enforcement until Dec 2010

# SDS

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## Communication down the supply chain when no SDS is required:

### If subject to Authorisation/restriction:

- Registration number
- Details of granted authorisation or appropriate info if authorisation is denied
- Details of restriction
- Other available and relevant info on safe use

### If not subject to Authorisation/Restriction:

- Art 32.1 applies:
  - Registration number
  - Available and relevant info to assure appropriate RMM



## Substance in articles

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**If the article contains SVHC and  $> 0.1\%$ :**

- **From Oct 2008 to provide ‘sufficient available information’ on safe use to the recipients of the articles and on request also to consumers within 45 days after receipt of request**
- **From 1 June 2011 (afterwards 6 months after inclusion of new SVHC on candidate list) to notify substance to ECHA ( if  $> 0.1\%$  and  $> 1\text{t/a}$ ). However, no notification needed if ‘exposure can be excluded’ . In that case only appropriate instructions to be submitted to recipient**

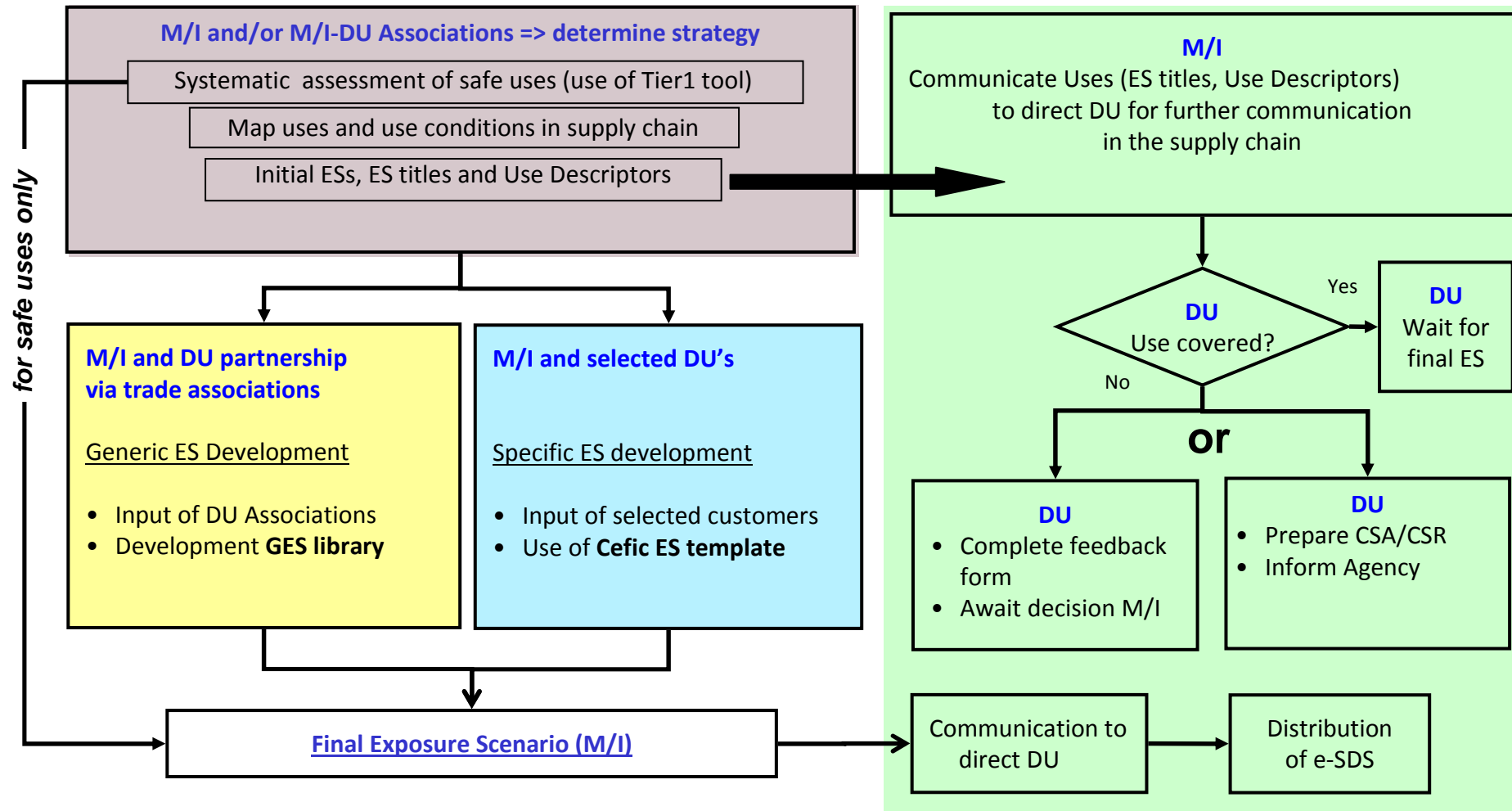
# Content

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- **Information in supply chain**
  - **Communication down the supply chain**
  - **Communication up the supply chain**
  - **Safety Data Sheets**
  - **Substances in articles**
- **Use and Exposure Communication**

# ES Development & Communication model



**Legend**  
M/I = Manufacturer / Importer  
DU = Downstream User

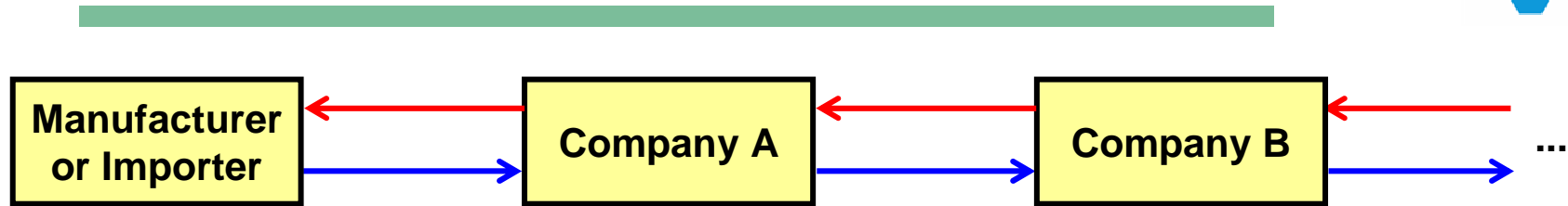
*For specific products and applications the appropriate (next) steps in the above diagram need to be determined based on expert judgement: not always all steps are needed and/or the order can be adapted.*

## REACH will result in considerable and frequent information exchange on Use and Exposure



- ESs address Use of a substance/preparation; ESs have to cover ALL supported uses; these include own uses of the M/I AND downstream uses supported by the M/I; the latter implies considerable **exchange of information** between M/I and DU
- Any DU has the right to **make his use known** to M/I, who has to consider to include this use as an identified use (> 12 months before relevant registration deadline); M/I has to **communicate** this with the DU
- M/I has to **communicate** information on hazardous properties and control of risks of substances to DUs by means of Safety Data Sheets (SDS), containing an annex on ESs (e-SDS)
- Any actor in the supply chain (M/I-DU-distributor) has to **pass relevant information** on hazardous properties, Risk Management Measures and e-SDSs to the next actor in the supply chain

# Information exchange along the supply chain



## Standardized approach needed for communication on Use and Exposure

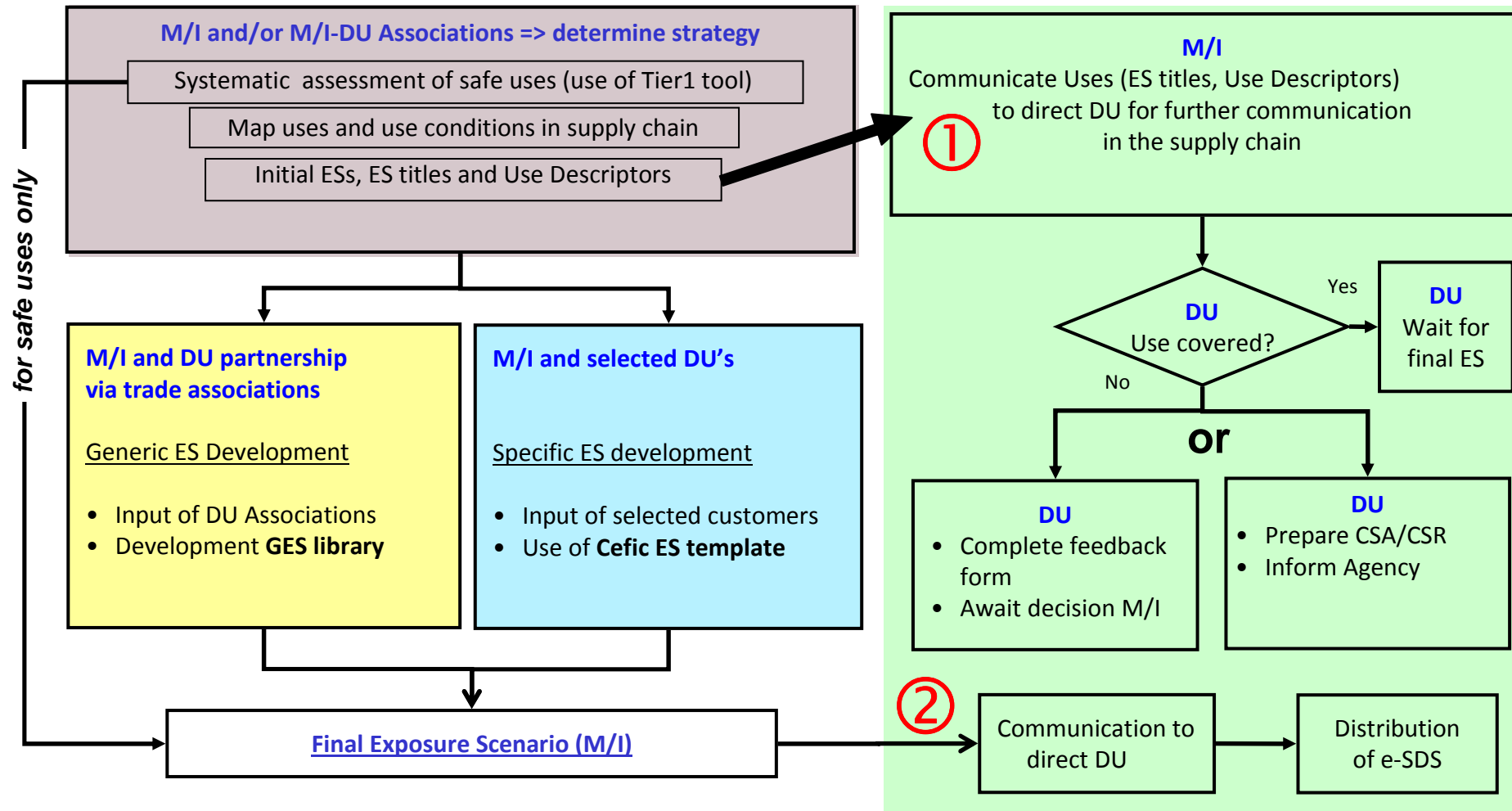
- Achieve common understanding between M/I and DU
- Coverage of as much uses as currently present in the supply chain
- Ensure effective and efficient communication (avoid grid-lock)



# ES Development & Communication model



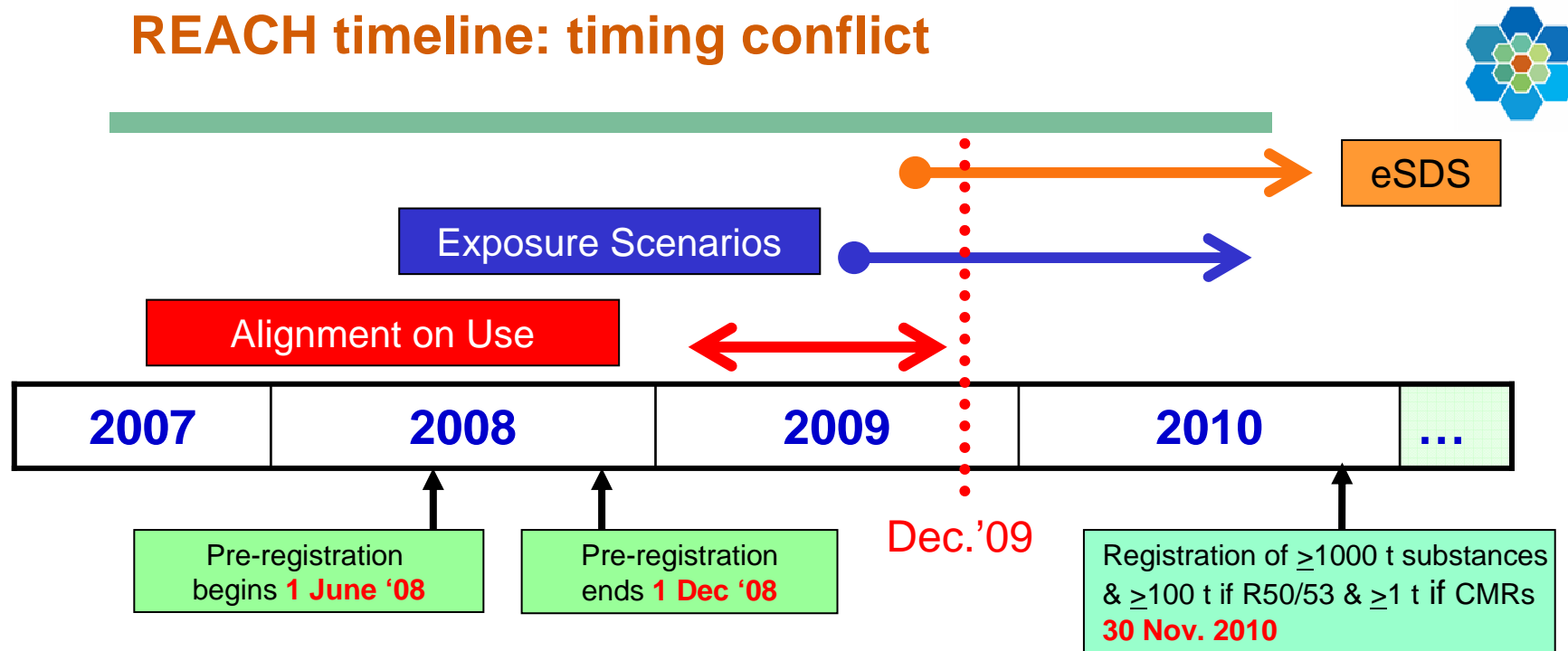
Downstream Users of Chemicals Co-ordination group



**Legend**  
 M/I = Manufacturer / Importer  
 DU = Downstream User

*For specific products and applications the appropriate (next) steps in the above diagram need to be determined based on expert judgement: not always all steps are needed and/or the order can be adapted.*

## REACH timeline: timing conflict



- First GESs start to be available **mid 2009**
- ES development will continue well into 2010
- DU has the right to make use known to M/I (identified use; should be done 12 months before registration deadline: **1 Dec. 2009**)
- ESs will mostly not be available at that stage => **DU will start communicating his uses to M/Is**

## Solution for timing conflict



### Actions:

- Communication on uses intended to be registered by M/I to DU **early** in the registration process **(2009)**
- Communication based on ES titles and Use Descriptions (according to Descriptor System of TGD) as developed by M/I: standard communication table
- M/I will provide Use information to all direct customers
- Customers can download Use information and pass it on down the supply chain
- Option for customers to make their Use identified to the supplier

### Results:

- DU obtains confirmation on coverage of his use as 'identified Use'
- If DU use is not covered as 'identified Use', DU can make his use known to M/I
- ES development by M/I based on a complete list of identified Uses.



## Communication IT tool

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**Cefic has developed a 'requirements' document for communication IT tool (to be build by internal/external IT provider).**

**Available on the Cefic website**

### **Characteristics IT tool:**

- **Tool is web-based**
- **Communication between Suppliers and direct Customers**
- **Suppliers will feed tool with relevant use information**
- **Customers will be able to download information to pass it on down the supply chain**
- **DU can give feedback using standardized form (as shown)**
- **IT requirements document planned to be available Jan.09**

## *Customer Communication IT Tool*

### **Pre-Requisites**

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- Suppliers will **identify the Customers** to whom they will communicate
- Suppliers will **assign Use Descriptors** to their products
- Suppliers will **determine the feedback deadline** for a product based on the registration requirements for the constituent substances
- Suppliers will **decide on the language requirements** for the tool while maintaining the consistent approach

## *Customer Communication IT Tool* **Phased Approach**

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Communication from the Supplier to the Customer will be in two phases

➤ **Phase 1**

Suppliers will advise Customers of the Uses to be included in the Exposure Scenario(s): Customers can notify Suppliers if their particular Use is not covered

➤ **Phase 2**

Suppliers will make available the Exposure Scenario(s) to Customers. This Phase will not have a feedback option in the tool

## *Phase 1* **Overview**

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**Suppliers will make available to Customers the following information:**

- **Supplier identification information (name, code, address etc)**
- **List of Products purchased by the Customer, regardless of the registration deadline, or the need for an Exposure Scenario**
- **Deadline for receiving feedback from the Customer**
- **For each Product, the following Use Identifier information:**
  - **ES Description**
  - **Sector of Use**
  - **Process Category**
  - **Product Category**
  - **Article Category**
  - **Environmental Release Category**

Phase 1  
Screen 1 Layout



Go to Screen 2

Product name	Input deadline		Status
Product 1	1-Dec-09	<a href="#">View Use info</a>	
Product 2	TBA	TBA	
Product 3	Not Required	ES not required	
Product 4	1-Dec-09	<a href="#">View Use info</a>	

Press here to **download the Use information** for all above products and associated material codes/names in an XML format

[Button](#)

Press here to **view all the Use information** sent to the supplier

[Button](#)

Press here to **inform supplier** of unlisted products

[Button](#)

Note: 'Status' entries in the table are set by Customers manually to track their progress in reviewing the information provided. Options by a pull-down menu:

Complete – no feedback

Complete – feedback provided

in-progress

## Phase 1 Screen 2 Layout



Go to Screen 3

It is our intention to include Exposure Scenarios for uses in the table below (subject to demonstration of safe use in the CSA) in the Registration dossier for the respective products

If [your Use is covered](#) by the provided ES identifiers, there is no need to take action. You will be provided with an ES when it is available.

If your [Use is not included](#) in the table and you wish to make it known to your Supplier, please use this form: **Button**

Product name: Product1

Feedback deadline: 1-Dec-09

Use identifier	
ES Title	Use descriptors
Formulation & packing of solvent-based mixtures	[SU3] Industrial Manufacturing (all) [PROC2] Use in closed, continuous process with occasional controlled exposure (e.g. sampling). Industrial setting [PROC3] Use in closed batch process (synthesis or formulation). Industrial setting [ERC 2] Formulation of preparations
Coatings	[SU3] Industrial Manufacturing (all) [PROC7] Spraying in industrial settings and applications. Industrial setting; [ERC 7] Industrial use of substances in closed systems

Phase 1

## Screen 3 Layout for Customer Input



**Product name:** Product1

In the 'Process and Activities' text box you can provide Exposure related information, e.g. how you commonly describe the activities you undertake. Additionally, please select the applicable Use descriptors as defined in the REACH Technical Guidance ([link](#), R12&R16).

Process and activities

[free text box]

Sector of Use (if relevant)

[select SUs from drop-down]

Process category

[select PROCs from drop-down]

Product category

[select PCs from drop-down]

Article category (if relevant)

[select ACs from drop-down]

Environmental Release Category

[select ERCs from drop-down]

**submit to supplier**



## Phase 2 Screen Layout



It is our intention to Register the supported Product Uses included in the table with the respective Exposure Scenario.

You will be provided with an updated SDS with an annex on ESs as soon as it is available.

Product name: Product1

Use identifier		ES
ES Title	Use descriptors	
Formulation & packing of solvent-based mixtures	[SU3] Industrial Manufacturing (all) [PROC2] Use in closed, continuous process with occasional controlled exposure (e.g. sampling). Industrial setting [PROC3] Use in closed batch process (synthesis or formulation). Industrial setting [ERC 2] Formulation of preparations	
Coatings	[SU3] Industrial Manufacturing (all) [PROC7] Spraying in industrial settings and applications. Industrial setting; [ERC 7] Industrial use of substances in closed systems	



## Standardized approach: recommended actions for M/Is

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- **Determine your strategy for ES development**
- **Engage with IT provider(s) for building/acquiring IT communication tool**
- **Map your products according to the Use Descriptor System for all uses you intend to register**
- **Consult (or check) the use identification prepared by DU organisations and other M/I, where available (e.g. websites, libraries) as a useful source of use descriptors**
- **Communicate ES titles based on Use Descriptors as soon as available to your direct customers**

## **Standardized approach: recommended actions for DU organizations**

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- **Map typical uses/applications within your sector, using the Use Descriptor System; make uses publicly available**
- **Organize sessions for your members to train them in using the Use Descriptor System**
- **Plan for resources to be available in order to actively contribute to Generic Exposure Scenario development**
- **Monitor publicly available REACH portals/websites to post information from your sector that will be useful for ES development**

## Standardized approach: recommended actions for DU

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- **Map your product uses, either using GES titles or using the Use Descriptor System**
- **Check whether your sector organization has mapped uses and if your uses are covered**
- **Provide input to your supplier when your use is not covered, using available IT tools and forms**
- **Cooperate actively with your sector organization and/or suppliers to facilitate and support the development of (Generic) ESs**

## Use and ES communication ‘holding letter’



- Development of the Use and ES communication tool, and the mapping of Use information will several months
- A communication ‘holding letter’ has been developed which can be used to explain this process to customers and/or suppliers

[http://www.cefic.org/Files/Downloads/Cefic-FECC-DUCC\\_document-on\\_use\\_FINAL.doc](http://www.cefic.org/Files/Downloads/Cefic-FECC-DUCC_document-on_use_FINAL.doc)



Dear customer,  
Dear supplier,

Recently you inquired on information about uses\* under REACH. This letter is to inform you about the communication process on uses. This process has been developed by the Chemical Industry via the Manufacturers Association Cefic, the Distributors Association FECC and the Downstream Users Association DUCC.

Before the Chemical Safety Assessment can be started, all uses should be known. The 'alignment on use' process has been designed to communicate the uses of any given substance in an efficient way. In this approach, manufacturers and importers start developing information on uses in cooperation with selected customers and with



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**Information from Cefic website:**

**<http://www.cefic.org/Templates/shwStory.asp?NID=494&HID=720&PHID=494>**

**Thank You**

**LHE@cefic.be**