Conclusions from RIPs on CSR and Exposure Scenarios
A Downstream User perception

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Some starting items

Personal:

- **Chemist**
- **20 years R&D in paint industry from basics to customer support**
- **5 years REACh for DuPont Performance Coatings**

Company:

- **DuPont Performance Coatings**
- **Main roles in REACh:**
  - Downstream User (formulator of preparations)
  - Paint supplier for industrial and professional use

Expectations from RIP 3.2 & 3.5

NB: These are the views of a paint maker

Provide General Guidance on :

How to get exposure scenarios from suppliers in a structured way

- Uniform → to be able to combine ES of different substances to a consolidated info down the supply chain (ES of a preparation)
  - Template
  - Norm texts
  - Normed base set of conditions for safe use
  - Related calculation tool for deviating conditions

How to perform Exposure Scenarios for DU of preparations

- Clear
- Understandable for low educated users
- Supporting easy comparison of reported ES to own situation
- Supporting ES corrections of DU

Results from RIP 3.2

Document: **1300 pages**

Content: **What should be covered?**

Which exposures should be covered?

How should the template look like?

What is meant by categories?

Missing items: **Definitions**

Guidance on „how to do“

Arona Statements from facilitator (1)

Conflicting wishes which ask for compromise

- Keep many options open to meet the requirements of REACH
- Ensure high performance of the system with regard to substance throughput and communication
- Usefulness of information for the addressee
- Don’t loose the science in the system.

Keep it as simple as possible !!

The cTGD works content-wise. However there is a need for refinements to improve the workability of the suggested processes and tools.

Andreas Ahrens, Oecopol

ecb.jrc.it/reachrip

Arona Statements from facilitator (2)

The template for the “core contents” of ES works as it stands, however the guidance should be clear that that information may need to be added or can be skipped depending on the case.

The ES needs standardization to an extent that it forms a consistent piece of information across all the raw materials bought at F level. Consistent point of departure in the ES needed: F depends on the comparability of ES for substances used in the same type of preparation

Andreas Ahrens, Oecopol

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Arona Statements from facilitator (3)

There is a need for a standardized descriptor system for uses, which is sufficiently linked to exposure assessment tools.

- **This should have the process/activity carried out with a substance as a starting point.**
- **Other aspects of use may be relevant as well (e.g. type of end-product; characteristic of users). It should be possible to also express these aspect in standard language, where needed.**
- **It is recommended that the technical function of the substance is no longer part of the descriptor system.**
- **The list of possible user groups (="IC") in the descriptor system should be limited. As a minimum, it should include consumer, professional [public domain], industrial.**
- **The system should allow to build and name exposure scenarios at a variable level of aggregation (composite ES).**
- **The number of different exposure scenarios communicated in the market should be limited !**

Andreas Ahrens, Oecopol

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Arona Statements from facilitator (4)

Manufacturer's final ESs supplied to DU are not (necessarily) suitable to serve as RMM guidance for final DUs. Thus formulators will need to "translate" the ES content into information for their customer groups.

The interface between ES building at M/I level and the ES use at F-level need further dialogue processes (independent of the further cTGD development). There is the need to agree on suitable platforms for this dialogue.

Andreas Ahrens, Oecopol

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Arona Statements from facilitator (5)

There are definable information-need at DU level to work with the ES received from M/I

- **Substance properties (SDS main body)**
- **Tools applied to demonstrate safe use in the CSR**
  - **List of determinants in the model**
  - **boundaries of model and general input values**
  - **Input values used in the particular case**
- **PEC regional (discussion !)**

There is a need to define, who takes responsibility to develop communication system beyond the eSDS, e.g. web-based platforms

There is general agreement on the approach of “ES modifiers” to be applied at DU level.

Andreas Ahrens, Oecopol

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Conclusion

RIP 3.2 and RIP3.5 are officially finalized

- **3.2 (CSR)**
  - **Content is hard to understand even for specialists**
  - **For formulators some starting points are set:**
    - **Template**
    - **Ideas about „categories“**
    - **Ideas about ES for preparation**
    - **Working tools like „ES modifier“ mentioned**

- **3.5 (DU obligations)**
  - **Very limited success because of restrictions**
    - **Limited time frame and timing conflict with RIP 3.2**
    - **Dependency on resuts of RIP3.2**