

# The CSR/ES roadmap

A cross-stakeholder plan  
of actions to 2018

Towards good quality  
information on the safe use  
of chemicals in the REACH  
chemical safety report and the  
extended safety data sheet

**LEGAL NOTICE**

This document has been developed by a cross-stakeholder group composed of industry, Member State authorities and ECHA. It presents a series of planned actions to support the goals of the REACH Regulation.

Readers are reminded that the text of the REACH Regulation is the only authentic legal reference and that the information in this document does not constitute legal advice. Usage of the information in this document remains under the sole responsibility of the user. The European Chemicals Agency does not accept any liability with regard to the contents of this document.

**The CSR/ES Roadmap. A cross-stakeholder plan of actions to 2018. Towards good quality information on the safe use of chemicals in the REACH chemical safety report and the extended safety data sheet.**

Reference: ECHA-13-R-05-EN

Publ.date: July 2013

Language: EN

© European Chemicals Agency, 2013

Reproduction is authorised provided the source is fully acknowledged in the form

“Source: European Chemicals Agency, <http://echa.europa.eu/>” and provided written notification is given to the ECHA Communication Unit ([publications@echa.europa.eu](mailto:publications@echa.europa.eu)).

If you have questions or comments in relation to this document please send them (quote the reference and issue date) using the information request form. The information request form can be accessed via the Contact ECHA page at:

<http://echa.europa.eu/contact>

**European Chemicals Agency**

Mailing address: P.O. Box 400, FI-00121 Helsinki, Finland

Visiting address: Annankatu 18, Helsinki, Finland

## LIST OF ABBREVIATIONS

ATIEL	Association Technique de l'Industrie Européenne des Lubrifiants
BAuA	Bundesanstalt für Arbeitsschutz und Arbeitsmedizin
Cefic	European Chemical Industry Council
Chesar	Chemical Safety Assessment and Reporting tool
CONCAWE	The oil companies' European association for environment, health and safety in refining and distribution (Conservation of clean air and water in Europe)
COSHH	Control of substances hazardous to health (UK system)
CSA	Chemical safety assessment
CSR	Chemical safety report
DUCC	The Downstream Users of Chemicals Co-ordination Group
ECHA	European Chemicals Agency
ECETOC TRA	European centre for ecotoxicology and toxicology of chemicals – targeted risk assessment
ENES	ECHA-stakeholder exchange network on exposure scenarios
EMKG	Einfaches Maßnahmenkonzept für Gefahrstoffe
ES	Exposure scenario
ESIG/ESVOC	European Solvents Industry Groups
EUROSTAT	European Commission Directorate General in charge of Statistics
Fecc	The European Association of Chemical Distributors
GES	Generic exposure scenario
GISBAU	Hazardous materials information system for the construction sector (German system)
NACE	Nomenclature Générale des Activités Économiques dans les Communautés Européennes
REACH	Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals
SCED	Specific consumer exposure determinant
SME	Small and medium-sized enterprise
SpERC	Specific environmental release category
TARIC	Integrated Tariff of the European Communities
UVCB	Substance of unknown or variable composition, complex reaction products or biological materials

**TABLE OF CONTENTS**

1. Foreword	5
2. Introduction	5
2.1 Tasks under REACH	5
2.2 Implementation of REACH processes in the market	6
2.3 Exposure assessment	7
2.4 Improvement needed	7
2.5 The roadmap	8
2.5.1. Governance	9
3. Actions	9
Area 1: Increase the common understanding among stakeholders	9
Area 2: Further develop information inputs for the chemical safety assessment	11
Area 3: Further develop IT tools and standardisation	14
Area 4: Support processing of information at formulators' level	16
Area 5: Support processing of information at the end-users' level	18
Appendix 1. Composition of the Roadmap Coordination Group	19

## 1. FOREWORD

The REACH Regulation (EC) No 1907/2006 placed the responsibility on the safe use of chemicals on industry and introduced a new framework in Europe for the assessment of chemical substances and their uses. The information from this assessment is summarised in the REACH chemical safety report (CSR). One key component of that CSR is the exposure scenario (ES) in which manufacturers or importers set out the conditions for safe use of their substance. This information is essential to many actors in the chemical supply chain in their day-to-day handling of substances. Authorities also need such information to evaluate the wider perspective of the risk management of chemicals and take decisions on additional regulatory risk management that may be needed in the long term in Europe e.g. restriction or authorisation. For all such actors and processes, clear and accurate information on substances and their use is required for effective decision-making.

Since the advent of REACH in 2007, much has been achieved in generating this information through the new framework. However, experience drawn from many actors recognises the need for continuous improvement to achieve the goals of REACH.

This roadmap sets out a series of discrete actions to help that process. The 21 actions combined cover the logical sequence of steps in gathering, assessing and communicating information on chemical substances. The rationale behind this cross-stakeholder initiative is explained in the following section. The actions that form part of a rolling programme to 2018 through which good practice examples, methods, guidance and tools will evolve is given in section 3. For each action, the organisations that will lead or take them forward are identified.

## 2. INTRODUCTION

### 2.1 TASKS UNDER REACH

Under Article 14 of REACH, manufacturers and importers of hazardous substances in quantities of 10 tonnes or more per year are required to carry out a chemical safety assessment (CSA) that covers exposure and risks for all the identified uses in the life cycle of the substance. The assessment must be documented in the chemical safety report (CSR). The purpose of the CSA is to define the conditions of safe use and to demonstrate that these conditions limit or prevent the exposure of humans and the environment to

the extent that risks are controlled. The conditions of use include operational conditions (e.g. the type of technical process or process temperature) and risk management measures (e.g. limiting of substance concentration in products or engineering controls).

Suppliers shall communicate the conditions of safe use down the supply chain of chemicals making use of the established safety data sheet mechanisms. Downstream users must check that their actual use is covered by the exposure scenarios supplied to them and hence has been demonstrated to be safe in the registrant's CSA. If the actual use or the conditions of use do not match the supplier's exposure scenario, the downstream users must contact their supplier, adapt their conditions or carry out their own downstream user CSA. In addition, the CSR is meant to inform ECHA and Member State competent authorities on the identified hazards of a substance, on its uses and the conditions of use (including risk management measures), as well as on the corresponding exposure estimates and risk characterisation. Authorities will use this information for their regulatory action and for carrying out their tasks as defined in the REACH Regulation, such as prioritising substances for authorisation or substance evaluation.

To start the CSA for registration in an effective and meaningful way, registrants need to combine the information on the properties of the substance with the information on the existing conditions of use. Registrants themselves have access to the information on the intrinsic properties of their substance and existing information about the main foreseeable uses in the upper part of the chemicals' supply chain. However, the information on the existing uses at the bottom of the supply chain and on the real life conditions of use lies mainly with the downstream users. Downstream users need to communicate this information to registrants so that the registrants can carry out their CSAs and communicate realistic information on the safe use of chemicals back to their customers.

## 2.2 IMPLEMENTATION OF REACH PROCESSES IN THE MARKET

The chemicals' market is a complex network of purchase, own use and supply, where most of the actors in the upper part of the supply chain are both suppliers and major users of chemicals simultaneously. In the lower part of the supply chain, substances (mostly in the form of mixtures) are processed into articles or used for providing all kinds of services e.g. cleaning and maintenance. The chemicals' market is dynamic and global, involving imports/exports and product innovation.

Implementing the REACH processes into the market is a new task and the legislator has set ambitious deadlines in REACH, which registrants and downstream users must adhere to. As a result, in order to be compliant, companies had to prepare their CSAs for the first time and forward the resulting exposure scenarios to their customers without much experience on the foreseen communication mechanisms in the supply chain. Since 2010, both industry and authorities have gained practical experience in these communication processes, and it has become evident to all actors that there are issues that still need to be solved and that improvements are needed to make the most out of the REACH mechanisms and improve the safe use of chemicals throughout the supply chain. While a lot of effort has been put into developing manageable processes, it is clear that many challenges still lie ahead.

### **2.3 EXPOSURE ASSESSMENT**

So far, most of the assessments have been carried out with a handful of exposure assessment tools, which aim to capture the vast real life variety in conditions of use in a relatively low number of exposure determinants. Consequently, the resulting information on operational conditions and risk management is relatively limited and communication down the supply chain should be straightforward. However, there is not yet sufficient standardisation in structuring the information content of the exposure scenarios and in presenting the information to the reader. Thus, the safety advice communicated downstream is very diverse in terms of layout and phrasing. Furthermore, the information generated by registrants is in text-format, instead of electronic data format. This leads to inefficiencies at the level of the downstream users and authorities when manually identifying, checking and processing the relevant information, and at the level of registrants when keeping their CSR text files up-to-date. Finally, the connection between exposure estimates under REACH and the established risk management practice under other legislation needs to be further developed particularly on the environmental side.

### **2.4 IMPROVEMENT NEEDED**

Since preparing for registrations in 2010, experience has been reflected and the CSAs of forthcoming registrations may already benefit from the lessons learnt. However, there remains a need to manage the processes for improving the CSAs for the already registered substances.

The need to improve the compilation, communication and use of extended safety sheets was also noted in the recent REACH Review conducted by the European Commission.<sup>1</sup> The Commission calls upon ECHA and industry to address the observed problems in order to promote the extended safety data sheet as a central risk management tool. This roadmap is a central means of responding to that call.

## 2.5 THE ROADMAP

This roadmap is based on a cross-stakeholder consensus. It recognises that the mechanisms introduced by REACH for producing exposure scenarios as part of CSRs and the communication of the relevant information up and down the supply chain are new and that it will take time for these mechanisms to be fully understood and practised. To that end, it sets out an action plan that will help to improve the mechanisms needed in readiness for the next REACH registration deadline in 2018, and improve the clarity and accuracy of the information already submitted. Through this roadmap, the CSR along with its exposure scenarios should become recognised as a cornerstone of the REACH processes and as the principal instrument to report on and communicate the conditions of safe use as identified in the registrants' chemicals safety assessment. The roadmap serves to catalogue the key areas that require attention so that these goals can be achieved. It outlines a series of actions in the context of a coherent continuous development process and arranges these actions in a realistic timeline. By transparently documenting the areas of improvement, it enables all stakeholders to take a shared responsibility towards the successful implementation of REACH, and allows the most efficient use of resources of all actors.

The actions presented in the roadmap are divided into five areas which reflect both the logical order<sup>2</sup> of the anticipated improvement needs and the flow of information in the supply chain:

- Increase the common understanding among stakeholders on the practical use of the information in the CSR and in the exposure scenario for communication;
- Further develop the methods and processes for generating the key information inputs for the CSA;
- Further develop IT tools and standardisation for generating, processing and exchanging CSR and exposure scenario information;
- Support understanding and processing of exposure scenario information at the formulators' level;

<sup>1</sup> See [http://ec.europa.eu/enterprise/sectors/chemicals/documents/reach/review2012/index\\_en.htm](http://ec.europa.eu/enterprise/sectors/chemicals/documents/reach/review2012/index_en.htm)

<sup>2</sup> However, as many of the actions are already on-going or about to be launched, the actions will in reality run in parallel.



and

- Support understanding and processing of exposure scenario information at the end-users' level.

### 2.5.1. Governance

It will be necessary that senior representatives from all the involved stakeholders confirm the commitment to provide adequate resources to ensure that real progress can be made in terms of delivery of the activities described in this document.

The Roadmap Coordination Group will monitor the implementation of the roadmap and will review the roadmap every second year. The ECHA-stakeholder Exchange Network on Exposure Scenarios (ENES) will act as a platform for sharing the information on concluded actions and agreeing on best practices.<sup>3</sup>

## 3. ACTIONS

### AREA 1: INCREASE THE COMMON UNDERSTANDING AMONG STAKEHOLDERS

**Increase the common understanding among stakeholders on the practical use of the information in the CSR and in the exposure scenario for communication.**

It is essential that the stakeholders share a common understanding on the purpose of the CSR/exposure scenario information in the various interactions between ECHA, national authorities (REACH competent authorities and national enforcement authorities), registrants and downstream users. Such common understanding is the basis for targeting the further development of methods/tools for assessment and communication. The available experience and practical examples of CSRs and exposure scenarios will facilitate a review of the current understanding related to the purpose and target audience of the different information elements in the context of a CSA.

<sup>3</sup> Consult <http://echa.europa.eu/enes>

**Action 1.1: Align understanding among stakeholders on the purpose of the different information elements in the CSR (e.g. description of use, exposure scenario title, risk management measures and operational conditions, exposure estimates, risk characterisation).**

**Method:** A kick-off workshop with general discussion (covering environmental, occupational and consumer exposure) and scoping of the task followed by a series of more targeted workshops as needed for individual CSR information elements, resulting in defining the “content essentials” for both human health and the environment-related elements of the CSR. ECHA and the Member States contribute to these workshops with their findings from evaluation. The workshops will be organised via ENES and ECHA’s illustrative CSR example may be used to facilitate the discussion.

**Lead:** ECHA

**Contributing:** Member State authorities and agencies (e.g. NL, UK, FR), industry organisations representing registrants; enforcement authorities to be involved.

**Timing:** To be started in late 2013, running for six to nine months.

**Action 1.2: Align understanding among stakeholders on the purpose of the different information elements in the exposure scenario for communication and in which way the information differs from what is documented in the CSR.**

**Method:** A kick-off workshop with general discussion and scoping of the task followed by a series of more targeted workshops, as needed, for the individual exposure scenario elements, resulting in the “content essentials” for the exposure scenario for communication (environmental, occupational and consumer exposure controls). Different needs of different user groups are to be taken into account. The workshops will be organised via ENES and exposure scenarios generated with Chesar<sup>4</sup> may be used to facilitate the discussion.

**Lead:** ECHA

**Contributing:** Member State authorities and agencies (e.g. NL, UK), industry organisations representing registrants and downstream users.

**Timing:** To be started in late 2013, running for six to nine months.

**Action 1.3: Disseminate the aligned expectations.**

**Method:** Documentation of workshop outcome in an easy-to-read document that can be broadly distributed to registrants and authorities through various channels.

**Lead:** ECHA

**Contributing:** Member State authorities and agencies, industry organisations representing registrants and downstream users.

**Timing:** Q3-Q4/2014

4 Consult <http://chesar.echa.europa.eu>

## AREA 2: FURTHER DEVELOP INFORMATION INPUTS FOR THE CHEMICAL SAFETY ASSESSMENT

**Further develop the methods and processes for generating the key information inputs for the chemical safety assessment.**

Based on the current understanding, it seems that the most crucial pieces of information needed for carrying out a CSA are 1) the brief description of identified uses and 2) the harmonised building blocks for the exposure assessment, for example generic exposure scenarios (GESs), specific environmental release categories (SpERCs) and specific consumer exposure determinants (SCEDs). All of these types of information are to be generated downstream to enable a meaningful CSA at the level of the registrant.

The development of the CSA building blocks has begun over the recent years, and some of them have already been widely used in registrations (e.g. GESs and SpERCs). Further development is anticipated. The main purpose of such building blocks is:

- to describe the conditions of use (including established risk management measures under other legislation) for specific product or process types, and
- to connect these descriptions to an exposure estimation method/tool that registrants can use.

The description of use plays a central role for both authorities and the actors in the supply chain. Actors in the supply chain need to ensure that the relevant risk management information follows the logistics of raw material purchase and product sales so that the use description connects the market knowledge with the exposure assessment. Authorities, on the other hand, have the task to check dossiers for compliance and to select and prioritise substances in a sensible way for the various REACH processes. For doing this, they need to be able to understand from the use description what is done with a substance at different life cycle stages.

### **Action 2.1: Review the current practice for describing uses (including use descriptor system) to determine where improvements are required.**

**Method:** Collect experience from sectors having described their uses in REACH terms. Analyse how the descriptions of use have been fed into the registrants' exposure assessments and the related exposure scenarios for communication. Collect expectations from authorities (including ECHA) regarding use description with a view to identifying the information needed for the REACH processes under the responsibility of authorities (e.g. selection and prioritisation of substances for evaluation or for authorisation). Make proposals for improving and aligning the current approaches to use description, including also the use description targeting the end of the supply chain (substance use in articles). The work also includes considerations on whether and how to complement the existing use descriptor system with additional categories, e.g. from TARIC or NACE system<sup>5</sup>. The further development of the approaches to use description should take into account the work carried out to harmonise the approaches to build the short titles of exposure scenarios.

**Lead:** ECHA

**Contributing:** Industry organisation representing downstream users and registrants, Member State authorities and agencies (e.g. DE, NL, FR).

**Timing:** To be started in late 2013, running for six to nine months.

**Action 2.2: Develop and illustrate good practice for description of use, based on the outcome of action 2.1.**

**Method:** Producing a series of illustrative good practice examples on description of uses (at downstream user sector level and registrant's level), followed by a (series of) workshop(s) where these examples are discussed and refined.

**Lead:** Cefic

**Contributing:** DUCC, Member State authorities and agencies (e.g. FR) and ECHA.

**Timing:** To be started in 2014

**Action 2.3: Analyse and exemplify the extent to which the existing exposure estimation tools/methods can facilitate a better link between REACH exposure scenarios and use-specific risk management advice established under occupational legislation (e.g. COSHH control sheets, GISBAU Safety Advice for construction chemicals and generic exposure scenarios (GESs) developed by ESIG/ESVOC and other sector organisations).**

**Method:** Identify existing sector-specific (and/or process-specific and/or product-specific) risk management advice that can be converted into REACH exposure scenarios and linked to corresponding exposure estimates (measured or modelled). Exemplify how existing Tier 1 exposure assessment tools such as the ECETOC TRA or BAUA's EMKG tool (as they are, or after further development) can facilitate the connection between existing risk management practice and the chemical safety assessment under REACH.

**Lead:** BaUA (DE)

**Contributing:** Industry organisations representing registrants and/or downstream users, exposure tool owners, ECHA.

**Timing:** End 2013 to 2015, starting from on-going activities.

**Action 2.4: Review the second generation of specific environmental release categories (SpERCs) available for the 2013 registration; identify the extent to which the SpERCs deliver a link to risk management measures established under environmental legislation; identify product or process types where this information is missing.**

**Method:** Review the second generation of specific environmental release categories (SpERCs) available for the 2013 registration to identify further development needs in terms of transparency in the justification of release factors, harmonisation of content/structure, the identification of scope, the transparency of operational conditions and risk management; to identify product groups, process types and/or sectors where this information is still largely missing (a gap analysis); to make SpERCs available in a format that allows their import into Chesar.

**Lead:** Industry organisations representing registrants and downstream users.

**Contributing:** ECHA, Member State authorities and agencies (e.g. DE, RO, FR, IT), DUCC.

**Timing:** Mid 2014–2015 based on the experience from converting SpERC information into risk management advice for communication

**Action 2.5: Further develop and test specific consumer exposure determinants (SCEDs) as harmonised consumer product specific data sets that can be fed into the consumer exposure assessment under REACH. Set up a process to get feedback on the concept from national agencies/authorities dealing with consumer protection. Enable the import of SCEDs into a Chesar based CSA.**

**Method:** Exemplify SCEDs and publish a first guidance (by sector organisations). Carry out one or more workshops with national authorities and ECHA for feedback and identification of potential critical issues. Update the TRA consumer estimation tool and enable Chesar chemical safety assessments utilising SCEDs to test all CSA elements and the generation of the exposure scenario for communication based on SCEDs. Based on feedback from authorities update the relevant ECHA Guidance document. Setting up a peer review process for SCEDs may be subject to a follow up action.

**Lead:** DUCC, CONCAWE.

**Contributing:** ECHA, Member State authorities and agencies (e.g. NL, DE, FR).

**Timing:** On-going 2013–2014; follow-up after 2014.

5 Harmonised EU systems to categorise economical activities (NACE) or products (TARIC)

**Action 2.6: Further develop methods for registrants to estimate substance volumes supplied into the different uses of a substance (in order to support the environmental part of the chemical safety assessment under REACH).**

**Method:** Identify existing data available at the registrant's level and/or sector level (substance manufacturing, formulation, distribution) and/or EUROSTAT that would enable registrants to break down the substance volumes supplied across different uses (to the extent needed for the environmental assessment). Develop a practical guide for supporting a harmonised approach to volume tracking in the CSR.

**Lead:** Industry organisations representing registrants

**Contributing:** ECHA

**Timing:** 2014-2015

**Action 2.7: Compile a consolidated and broadly agreed overview on the content and structure of information that should be available from downstream sectors to enable a good quality CSA and corresponding exposure scenarios communicated down the supply chain (see Action 2.1 to 2.5). Subsequently, sectors are expected to adapt to the agreed elements if not done so already.**

**Method:** Based on the outcome of the actions above codify best practice through update of ECHA Guidance.

**Lead:** ECHA

**Contributing:** DUCC and other industry organisations representing downstream users

**Timing:** 2015-2016

### AREA 3: FURTHER DEVELOP IT TOOLS AND STANDARDISATION

Further develop IT tools and standardisation for generating, processing and exchanging CSR and exposure scenario information.

IT tools play a significant role in managing the vast amount of information generated, communicated and processed under REACH. These tools support the consistency of information and efficiency all the way from hazard assessment to exposure assessment and to the communication of conditions of safe use down the chemicals' supply chain. IT tools also enable the electronic exchange of information (still including the possibility to communicate printable text documents for example to SMEs) thereby reducing the need for manual steps in the process and providing for efficient search mechanisms.

#### Action 3.1: Further develop the IT tools IUCLID and Chesar to enable the generation, processing and exchange of transparent and standardised CSR information in electronic format.

**Method:** Review of IUCLID and Chesar in cooperation with industry and authorities to see where changes in the data structure and workflow could better support the CSA process and the corresponding CSR for the broad range of substance types (including e.g. multiconstituents and UVCBs) to be registered (taking into account the potential impact for the existing registrations). This also includes linking to additional Tier 1 or Tier 2 exposure estimation tools. Enable CSRs to be stored and exchanged in structured electronic format (instead of text files). Put in place a systematic process to review the current use of Chesar and gather proposals for improvements for future releases as well as promote its use.

**Lead:** ECHA

**Contributing:** Industry organisations representing registrants and downstream users, Member State authorities and agencies (e.g. FR).

**Timing:** On-going (2013 to 2016)

#### Action 3.2: Further develop and improve existing exposure assessment tools, including their extension for broader categories of substances.

**Method:** Analyse the outcome of the on-going validation of existing exposure tools; collection of user feedback (including experience on limits of applicability) for the different tools, including those plugged into Chesar; identification of development needs; initiation of tool/guidance update.

**Lead:** Industry organisations representing registrants; exposure tool owners (may include ECHA when taking over the responsibility for the maintenance / further development of EUSES).

**Contributing:** Member State authorities and agencies, ECHA.

**Timing:** Q4/2013–Q3/2014

**Action 3.3: Develop the phrase library (ESCom) and the electronic exchange format (ESComXML) to further support the efficient exchange of clear and consistent information on safe use of chemicals. Set up a transparent and sufficiently resourced standardisation mechanism within industry.**

**Method:** Cefic and DUCC set up a Memorandum of Understanding (MoU) with IT providers, ECHA and other interested parties for the publication and further development of the IT exchange standard for exposure scenario information (ESComXML) and the library of harmonised phrases for describing the conditions of safe use in the exposure scenario for communication (ESCom). Based on this, publish the ESComXML V.2.0. via Cefic's website. Put in place an appropriate infrastructure via i) a Steering Committee to oversee this development and ii) via a technical working group to further develop the phrase catalogue. The further development of the ESComXML is covered by a collaboration agreement being finalised by IT providers.

**Lead:** Cefic/DUCC.

**Contributing:** ECHA and potentially IT providers.

**Timing:** On-going (2013) and regular update thereafter.

## AREA 4: SUPPORT PROCESSING OF INFORMATION AT FORMULATORS' LEVEL

### Support understanding and processing of exposure scenario information at formulators' level.

Formulators are in a key position in the chain of actors who transfer information on the safe use of chemicals in the supply chain. Registrants generate information on the conditions of safe use for single substances and the formulators need to process and link this information for the safe use of their products, i.e. mixtures.

Proper functioning of this information transfer mechanism will depend on the extent to which i) the generation of sector specific CSA building blocks by downstream user organisations has worked beforehand (see area 2) and suitable tools for electronic exchange are available (see area 3). Some of the following actions are based on the assumption that the actions under 2 and 3 have delivered as expected.

#### Action 4.1: Registrants of the same substance intensify cooperation to harmonise the advice on safe use in the extended safety data sheets.

**Method:** Compile a set of practical examples where the risk management advice for the same substance in the same use differs significantly from supplier to supplier. Discuss and exemplify (at one or more workshops) which kind of harmonisation would be desirable and how the process of developing a joint CSR could play a role. Publish and disseminate a best practice (guide) to registrants for consolidating risk management advice based on information made available from downstream user sector organisations.

**Lead:** Cefic and sector organisations representing registrants, REACH consortia.

**Contributing:** ECHA, Fecc.

**Timing:** 2013-2015

#### Action 4.2: Agree on and promote a harmonised layout-format for the exposure scenarios for communication in order to support human readers in navigating through the exposure scenario annex of the safety data sheet, including short titles, main sections and table of contents.

**Method:** Set up an alignment process within industry (downstream users and registrants) and draft a set of guiding principles supported by illustrative examples on the standard information elements in the short title for the exposure scenario. In a second phase focus on the harmonization in the presentation of contents in the main sections of the exposure scenario, taking into consideration the outcome of Action 1.2.

**Lead:** DUCC

**Contributing:** ECHA, Member State authorities and agencies (e.g. NL), Cefic.

**Timing:** On-going; 2013-2014

#### Action 4.3: Support formulators in understanding their options when receiving an extended safety data sheet from the supplier.

**Method:** Review and further development of ECHA's Practical Guide for Downstream Users receiving exposure scenarios: add illustrative examples of how downstream users can respond to the exposure scenario information received, and explain the pros and cons of the choices available. This may include for example, feedback to the supplier, scaling of exposure scenario information, and downstream user chemical safety report. Develop training support for industry associations to help companies.

**Lead:** ECHA

**Contributing:** Industry organisations representing downstream users, Member State authorities and agencies (e.g. IT)

**Timing:** 2014



**Action 4.4: Further develop the methodology to link the substance-related safety advice in the exposure scenarios with the communication on safe use of (substances in) mixtures.**

**Method:** Agree on the general (high level) principles in the context of the update to the ECHA Guidance for Downstream Users in 2013. Publication of sector-related approaches (e.g. the ATIEL concept for lubricants published in autumn 2012). Analysis and comparison of existing approaches and methods in order to derive a common framework for making use of the exposure scenario information (generated under REACH) for the safe use of mixtures. Regular monitoring on progress and exchange on practices via ENES.

**Lead:** Industry organisations representing downstream users and Cefic (regarding developing, analysing/comparing and publishing of sector-related approaches); ECHA regarding Guidance update process.

**Contributing:** ECHA and Member State authorities and agencies (e.g. DE).

**Timing:** On-going-2015; continuation 2016-2020

**Action 4.5: Explain and exemplify how a downstream user chemical safety assessment can be carried out in practice, and which sources of information can be used.**

**Method:** Collect experience on carrying out a downstream user CSA; identification of issues where clarity and/or further support is needed; explore which sources of information can be used and under which conditions (e.g. supplier's extended-SDS; assessment made under other legislation; ECHA's dissemination website if relevant data are missing in the safety data sheet); exemplify different types of DU CSRs (e.g. based on measured release or exposure data, based on simple exposure calculation, based on existing work place risk assessments); producing respective support material (including examples) and making it widely known in the downstream user community.

**Lead:** DUCC and other industry organisations representing downstream users.

**Contributing:** ECHA (exemplification of DU CSR types), Cefic.

**Timing:** 2013-2014

**Action 4.6: Increase understanding of what authorities can do with the information contained in the downstream user reports to ECHA and downstream user chemical safety reports.**

**Method:** Publish a report on the experience so far with downstream user reports to ECHA (notification of the fact that own conditions of use are outside the conditions described in the exposure scenario received from a supplier), including an explanation on what can be done with the information. The outcome of this report should be taken into account to consider potential improvements to the reporting scheme.

**Lead:** ECHA

**Contributing:** Member State authorities and agencies (e.g. FR, RO).

**Timing:** 2014

## AREA 5: SUPPORT PROCESSING OF INFORMATION AT THE END-USERS' LEVEL

### Support understanding and processing of exposure scenario information at the end-users' level.

This area of action can and will benefit a lot from the results achieved in the previous step of the roadmap's implementation. However, end-users (industrial sites and professional users) differ markedly from formulators in at least two aspects: 1) they do not need to forward the safety information they receive in the form of safety data sheets; and 2) the group is very heterogeneous in terms of size, technical processes/activities, relevance of risk management requirements from other legislation, knowledge on REACH. Please note: Making information on conditions of use at this level in the supply chain available to registrants is already covered under action area 2.

#### **Action 5.1: Analyse the information needs of the different end-user groups and improve the presentation of information on safe use of mixtures in the safety data sheet (either in exposure scenarios or in the main body of the document).**

**Method:** Workshop or equivalent to share among different end-user sectors the desired elements and the order of presentation of these elements in the safety data sheet. Subsequently, to promote good practices via various communication vehicles.

**Lead:** DUCC and other industry organisations representing/including downstream users (end-users).

**Contributing:** ECHA, Member State authorities and agencies; potentially partner with other agencies and networks to identify good methods for presenting information to SMEs.

**Timing:** 2015

#### **Action 5.2: Spread information to increase awareness on agreed issues in an effective way to the end-user sectors.**

**Method:** Variety of communication and awareness raising tools, including monitoring at ENES meetings.

**Lead:** DUCC and other industry organisations representing downstream users (end-users).

**Contributing:** ECHA, Member State authorities and agencies; potentially partner with other agencies and networks to identify good methods for presenting information to SMEs.

**Timing:** 2016 onwards

## APPENDIX 1. COMPOSITION OF THE ROADMAP COORDINATION GROUP

### Representatives from Member State authorities

AT	Eugen Anwander	Federal State Service Vorarlberg
DE	Eva Lechtenberg-Auffarth	BAuA – Federal Institute of Occupational Safety and Health
DK	Bengt Horn Andersen	Danish Ministry of Environment
IT	Flaviano d’Amico	National Agency for New Technologies, Energy and Sustainable Economic Development
IT	Renato Cabella	Istituto Superiore di Sanità
ES	Ruben Cordoba	Spanish Ministry of Health, Social Services and Equality
NL	Renske Beetstra	Inspectorate SZW
PL	Monika Wasiak-Gromek	Bureau for Chemical Substances
UK	Christine Northage	Health and Safety Executive

### Representatives from industry

Cefic	Erwin Annys
CONCAWE	Chris Money
DUCC	Sylvie Lemoine
DUCC	Laura Portugal

### Representatives from ECHA

Andreas Ahrens  
 Andrew Murray  
 Laura Walin

EUROPEAN CHEMICALS AGENCY  
ANNANKATU 18, P.O. BOX 400,  
FI-00121 HELSINKI, FINLAND  
ECHA.EUROPA.EU