



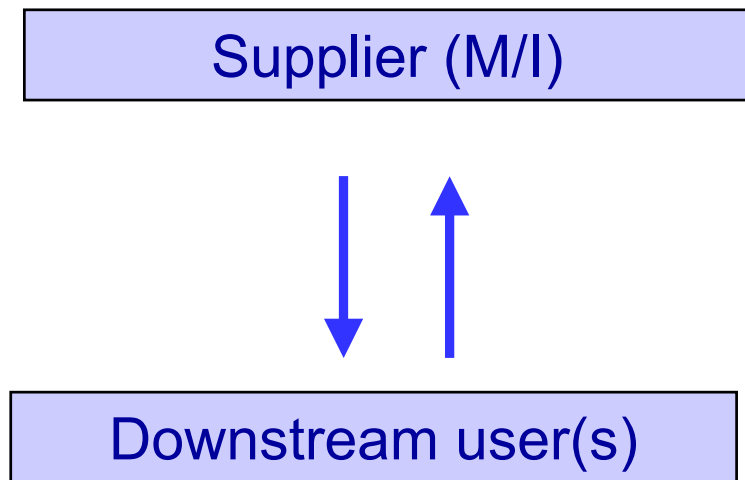
Best Available Communication Techniques

France Capon

- Intro: purpose and objectives
- DUs obligations
- Different tools:
 - For the Registrants
 - For the DUs
- How to communicate in practice?
- Conclusions



- REACH requires extensive data gathering and the establishment of an effective communication system up and down the supply chain of a substance

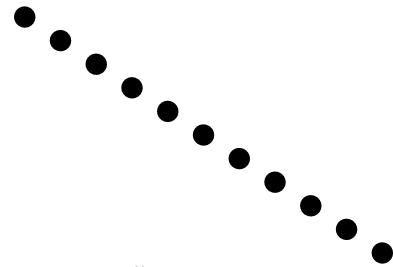
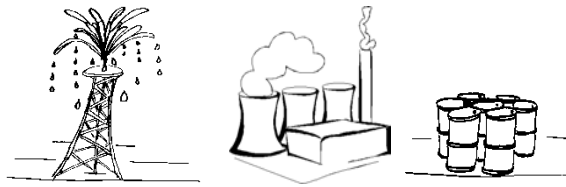


Interest in developing **ESs that are relevant for the DU**

Knowledge on substance properties and toxicity & performing risk/safety assessment

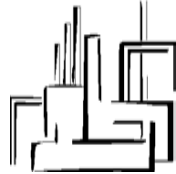
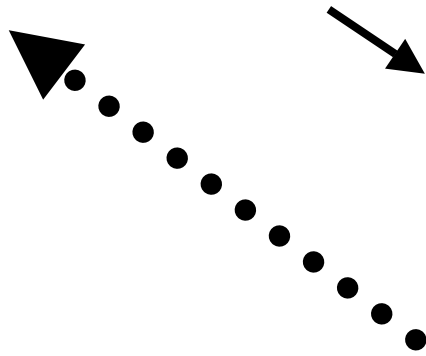
Interest in **receiving relevant ESs**

Knowledge on substance precise use, processes and on current RMM and operational conditions



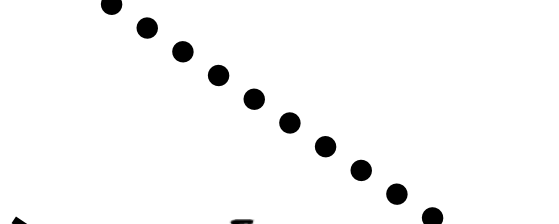
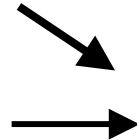
Safety Data Sheets / Chemical Safety Reports

- exposure scenario
- risk management measures
- registration number
- authorization/restriction info



Information on use/ exposure scenarios

- uses
- sufficient info for exposure scenarios
- risk management measures
- new info on hazardous properties

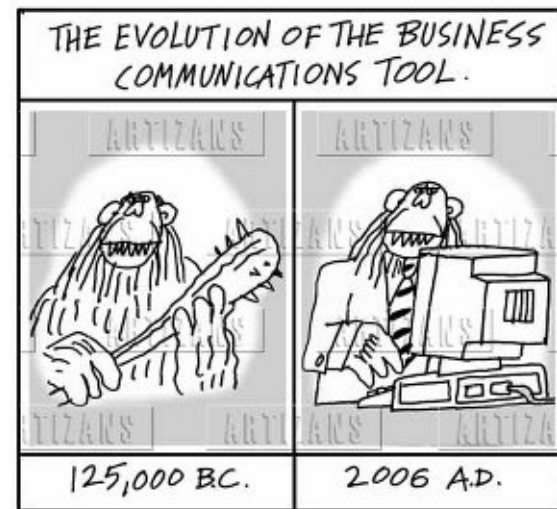


End User

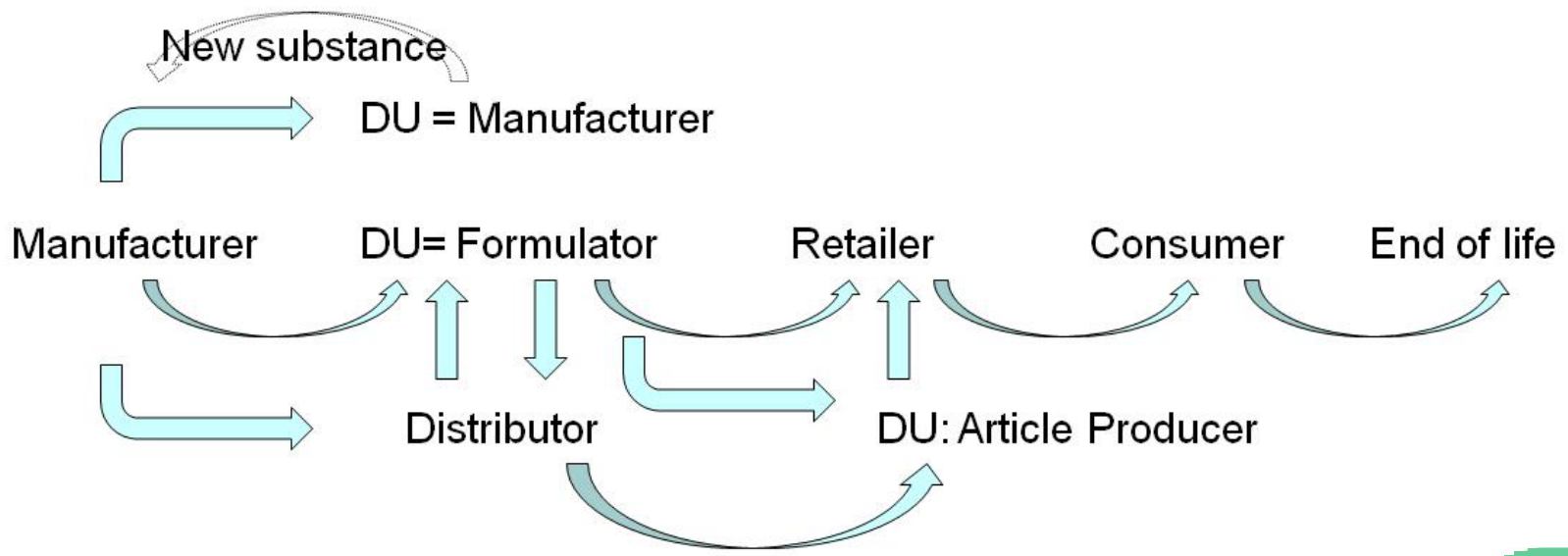


- DU: **may** provide information to assist registration (Article 37.1)
 - DU: **No obligation** to supply information, **but** then
 - **use may no longer be supported**, or
 - must **submit information to ECHA** to support use (Articles 37.4, 38.1(a))
 - *Exceptions:*
 - DU **must provide** information **on hazardous properties** of a substance back up the supply chain (Article 34(a))
 - If DU requests inclusion of its use as **an identified use**, he **must provide all available information** (Article 37.2)
- N.B.:** **deadline to “identify use”** – 12 months before the Registration deadline (e.g.: **30 November 2009 for Nickel**)

- Questionnaires (e.g.: MMQ)
- Technical estimations exposure:
 - Occupational Exposure assessment tool:
 - ECETOC
 - ART models (10 metals involved)
 - Environmental scaling tool: DU calculator
- Safety Data Sheet (including Exposure Scenarios for the Substances meeting the criteria)
- SIEF: no obligation to share exposure data information BUT could be used as a exchange platform

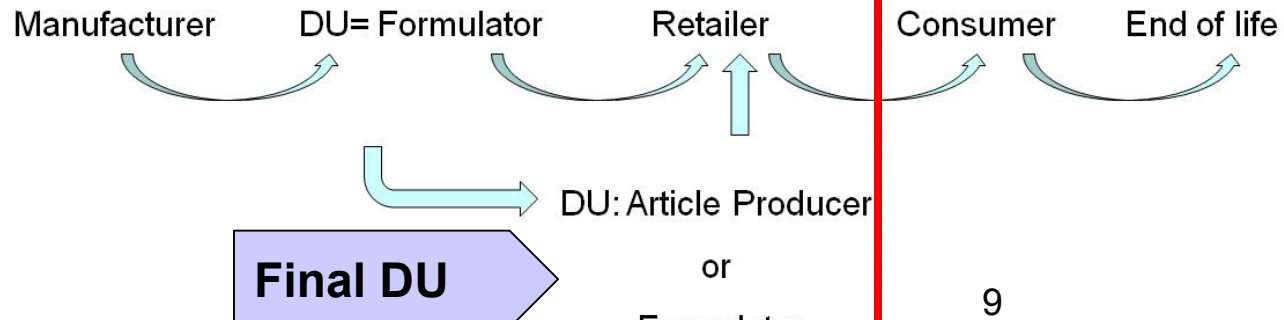
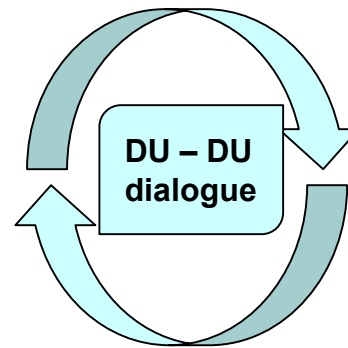
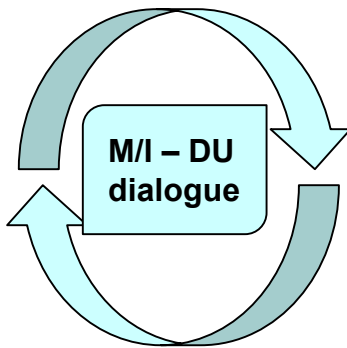


- Letter to identify use
- DU calculators to check environment and health conditions
- Questionnaires to be adapted and filled
- Use similar tools further down supply chain



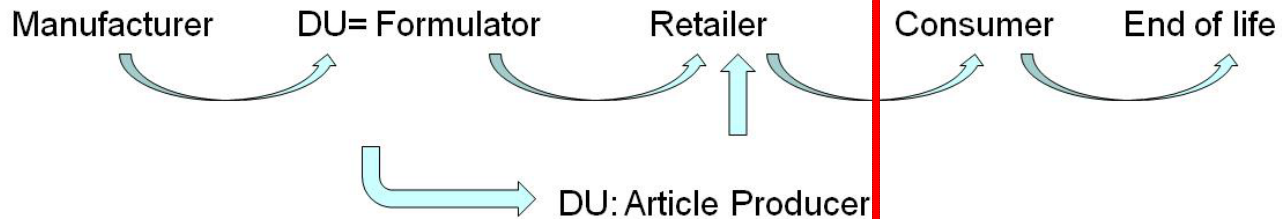
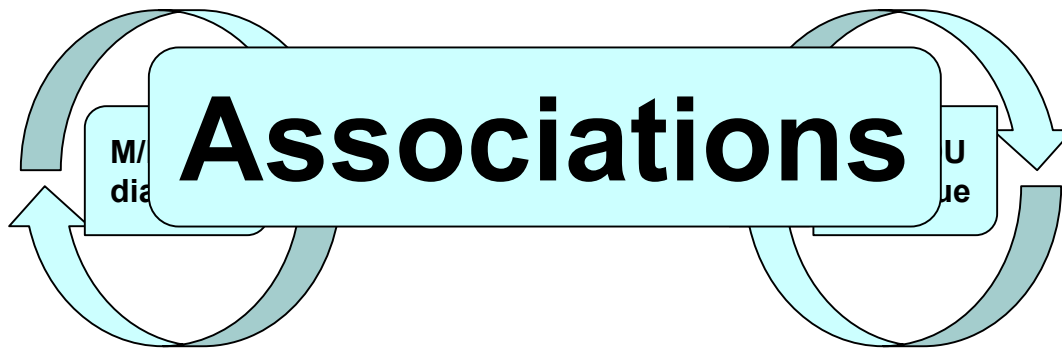
- Identification of uses
- ES building
- Conducting CSA

- Making uses known to M/I
- Informing about conditions of use
- Giving feedback on ES



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Benefits	Drawbacks
Simplification of the communication	Difficulties to get access to sites specific data
Reduce burden on the companies	Representativeness of the sector
Harmonization of the communication tools (questionnaire, GES...)	Lack of organisation of some sectors
Centralization of the knowledge	Liability issue





- Excellent tools available
- EU language barrier in some SMEs and MS
- Time consuming: keep track to avoid any delay in the Registration process
- Accurate data needed to avoid default scenarios
- Break in communication through the supply chain at consumer level: need to work with assumptions