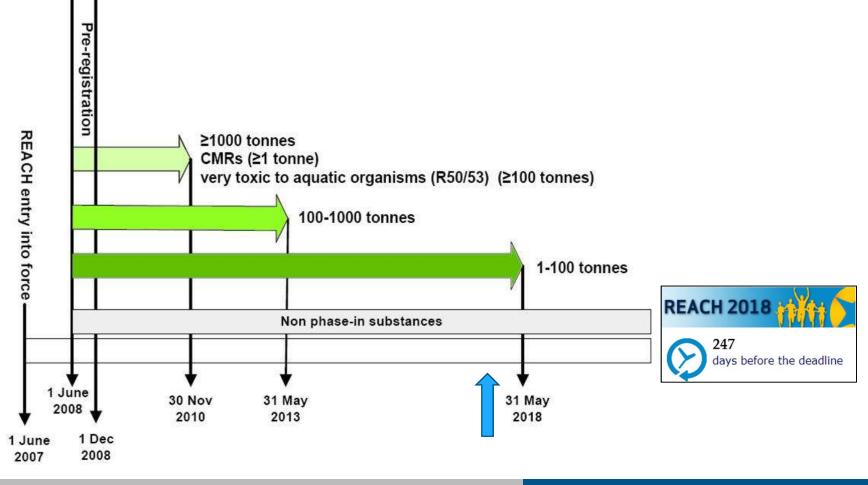


REACH Guidance:

Lead Component Identification (LCID) and Safe Use of Mixtures Information (SUMI)

KBull@spherasolutions.com

REACH registration deadlines

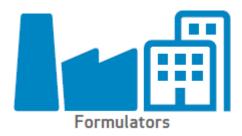


http://www.cirs-reach.com/REACH/REACH_Registration.html

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Communication of safe use information



Safe use of <u>mixtures</u> from ESs of substances

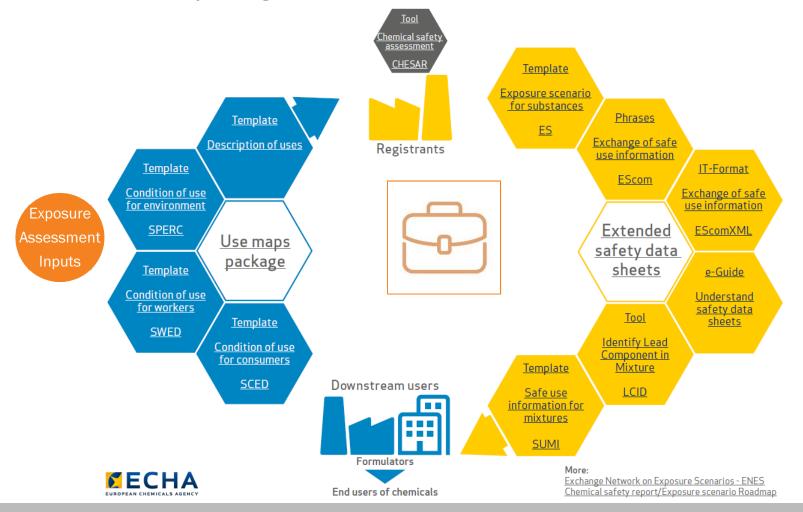
Registrants ESs Safe use of <u>substances</u> ENES (exchange network on exposure scenarios) ECHA, Cefic, Concawe, Eurometaux, Fecc, A.I.S.E, DUCC

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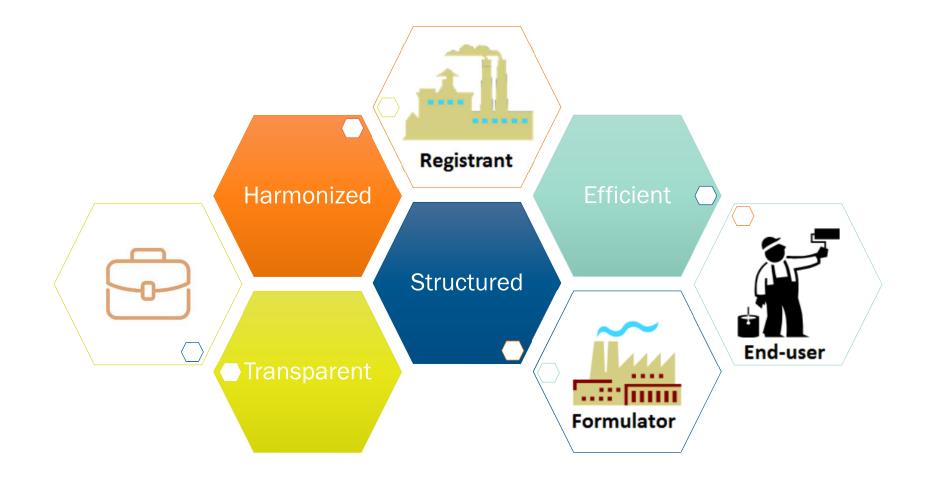
Chemical safety report/Exposure scenario roadmap

Improving communication on the safe use of chemicals

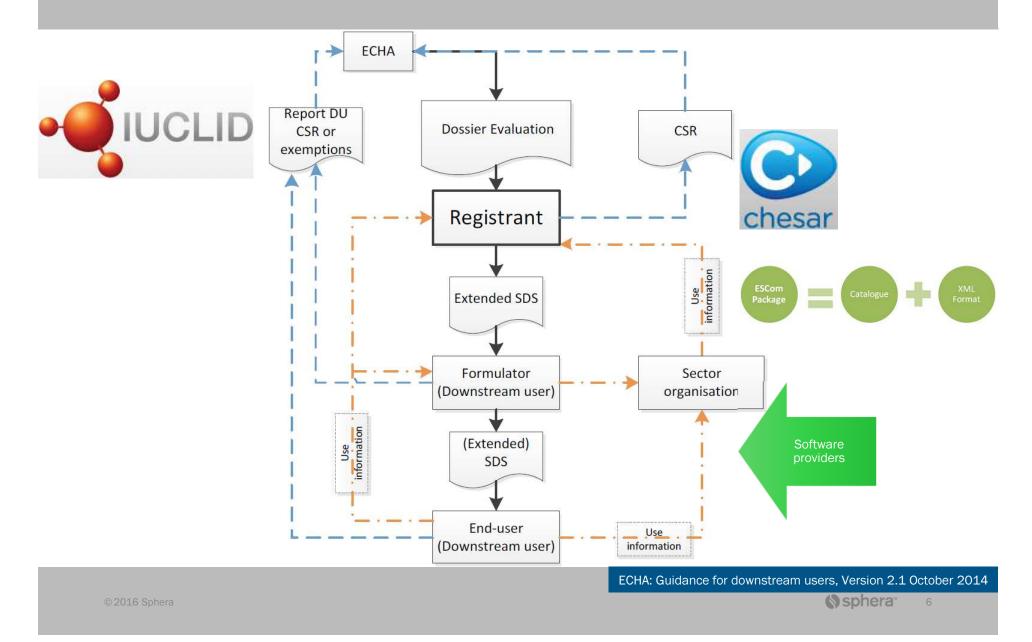


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Communication in the supply chain



Communication flows under REACH



CSR/ES roadmap – Action areas

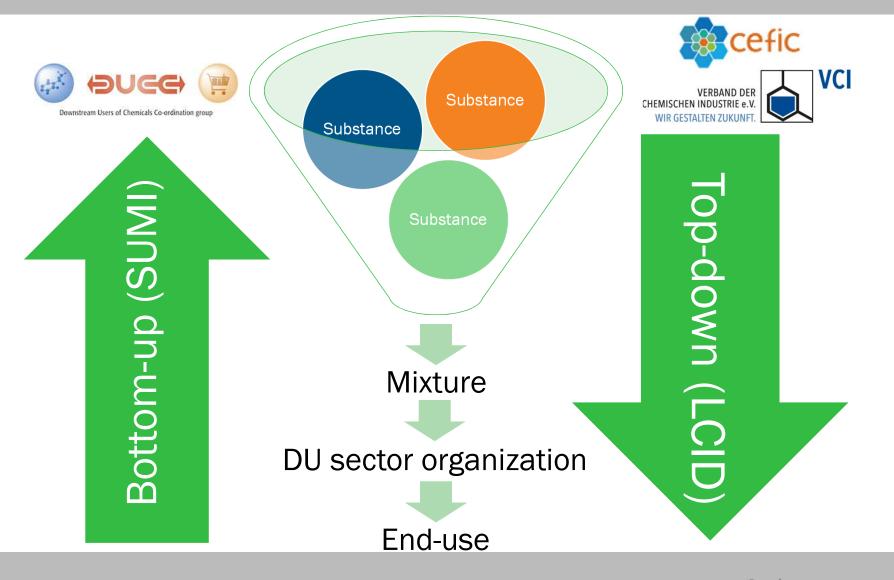
Action area 4: Support to formulators

	 Action area 1: Increase common understand stakeholders 	> Action 4.1: Harmonisation of the safety advice among co-registrants
		> Action 4.2: Harmonised layout for the ES for communication
	Achieve a common understanding among stakeho	
	of the information in the chemical safety reports scenario for communication.	> Action 4.3: Understanding the formulators' options when receiving an extended SDS
1	 Action area 2: Information inputs for the che assessment 	 Action 4.4: Converting substance exposure scenarios into advice on the safe use of a mixture
	Identify the information that registrants need fro so that the uses can be assessed, and helpful	This action seeks an agreement on the high level principles for linking the exposure scenario information on substances to the safe use advice for mixtures.
	communicated down the supply chain.	Status: Completed
R	> Action area 3: IT tools and standardisation Develop IT tools to support the efficient generation	Agreed general principles were incorporated into the 2013 version of the ECHA Guidance for Downstream Users. The two main approaches identified, referred to as top-down and bottom-up approaches, have been further developed since then.
	of consistent information on safe use.	
_		Top-down approaches
	> Action area 4: Support to formulators	A methodology has been developed to identify the components that determine the risk management measure, termed lead component identification (LCID). The Practical Guide was published by Cefic/VCI in April 2016.
	Harmonise the exposure scenario and develop wa consolidate the information from single substance the conditions of safe use for their products effectively.	 REACH Practical Guide on Safe Use Information for Mixtures under REACH. The Lead Component Identification (LCID) Methodology (Cefic)
	enectively.	Bottom-up approaches
	> Action area 5: Support to end-users	A safe use of mixtures information (SUMI) template has been developed which presents safe use advice information for mixtures in an easy to read format. Guidelines on the methodology were published by DUCC in December 2015. A
	Identify the needs of the various industrial and p of chemicals relating to safety advice, and promot	library of SUMIs, containing sector-specific advice for common uses, is expected to be finalised in 2015. This work is closely connected to sector-specific worker

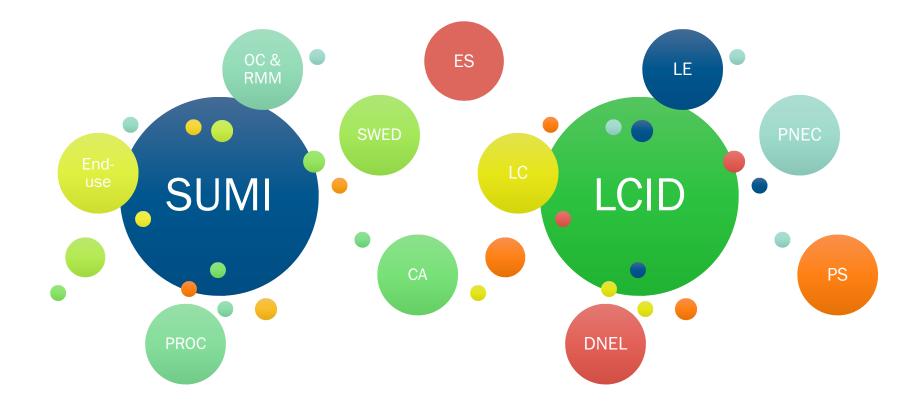
SUMIs/SWEDs aim to define the existing conditions of use for mixtures as the

exposure descriptions (SWEDs, see action 2.3.A).

Approaches: UP and DOWN

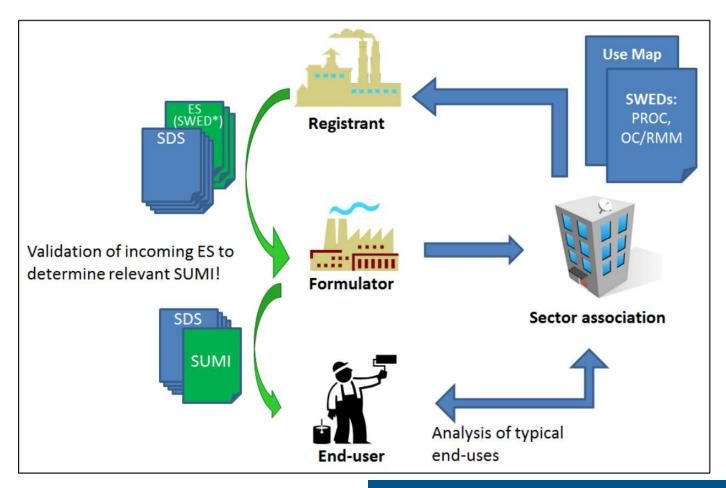


$\Delta G = \Delta H - T\Delta S$



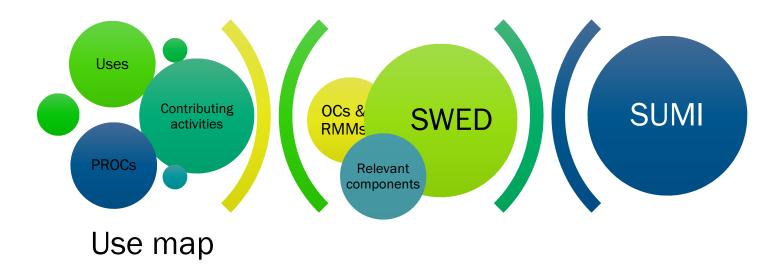
Bottom-up: SUMI (safe use of mixtures information)

Communication in the supply chain



SWED: sector-specific worker exposure description

SUMI approach



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Use maps

Mixture: detergent

Sector: A.I.S.E.

> A.I.S.E. Soaps, Detergents and Maintenance pro

> Cosmetics Europe Cosmetics and personal care products

> EFCC Construction Chemicals

> FEICA Adhesive and sealant industry

> I&P Europe Imaging and printing products A.I.S.E.
 Soaps, Detergents and Maintenance products

Sector acronym	A.I.S.E.
Sector name	Soaps, Detergents and Maintenance products
Keywords	Substances involved: Solvents, Surfactants, Waxes, Bases/Acids, Builders, Additives, Fragrances, Bleaching agents, Brighteners, Cleaning agents, Propellants, non-motive (blowing agents),
	Covered uses: Industrial, professional, consumer end-uses
Use map elements	Available: Use map, SWEDs, SPERCs, SCEDs
	Forthcoming: In the coming months: review of existing SPERCs and SCEDs.
Last updates	10/11/2016, Initial publication
General remarks	
✓ Files	
Use map	usemaps_v1 [XLSX]
SWEDs	swed_v1 [XLSX]
SPERCs	sperc2abc_factsheet_oct_2012 [DOC] sperc2g-l_factsheet_oct_2012 [DOC] sperc4_factsheet_oct_2012 [DOC] sperc5_factsheet_oct_2012 [DOC] sperc8a1a-c_factsheet_oct_2012 [DOC] spercs_overview_table_oct_2012 [XLSX]
SCEDs	sceds_factsheets_may2015_v1 [PDF] sceds_supportingdocument_may2015_v1 [PD]

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Use Map

SWEDs: PROC, OC/RMM

Use maps – A.I.S.E.

End-use: industrial \rightarrow tab: AISE INDUSTRIAL USES

Use maps template	e - Last updated:	April 2016										
Sector Name:	A.I.S.E.			Date:	October 2016							
Use identification	and general desc	ription										-
Use code	Link to entry in previous use maps	Life Cycle Stage	Life Cycle Stage code	Use name	ESCom standard phrase code(s) for use name	Further description of use	Sectors of use (SU)	Product categories (PC)	Article categories (AC)	ES short title for communication	This use leads to subsequent service life (Y/N)	Reference to subsequent service life use and relevant substances (if Y in previous column)
AISE_IS_002_v1		Use at industrial sites	U	Industrial uses; Metal surface treatment products SE NAN	ne		SU17	PC14		Use at industrial sites; Metal surface treatment products (PC14); General manufacturing, e.g. machinery, equipment, vehicles, other transport equipment (SU17)	no	

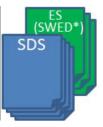
Use maps – A.I.S.E.

	A.I.S.E.		Date:	October	2016										
e identificatio	n and general des	scription													
Use code	Link to entry in previous use maps		Life Cycle Stage code	e phras	standard e code(s) se name	Further description of use	Sectors of use (SU)	Product categories (PC)	Article categories (AC)		rt title for unication	This use to subse service lif	equent	Reference to subsequent service life use and relevant substances (if Y in previous column)	
SE_IS_002_v1		Use at industrial sites	IS Industrial uses Metal su treatme	pucts			SU17	PC14		products (P manufactur machinery,	ce treatment C14); General ing, e.g.	no)		
	Link activitie	s to exposure a	assessment inputs											Additional information	tion (optio
	Contributing activity (CA) type	e la				tandard code(s) name		CA desc	CA descriptor Exposure assessment input code f			ut code for t	Generic composition by technic r this functions; maximum concentrat per technical function; tonnag information; other		
	Workers	Transfer and o dedicated dos	dilution of concentrate		g ·			sfer of substa g) at dedicate		e (charging	AISE_SWED_IS	_8b_1			
_	Workers	Brushing: Auto	omated ras	RMM	miss	ina: PRO	C10 - Rolle	er application of	or brushing		AISE_SWED_IS	_10_1			
(Conti	ribut	ing Act	tivitv	nar	ne 💀		energy manip und in/on mat		0	AISE_SWED_IS	_21_1			
'				-		103		tmont of artic	loc by dipping	and nouring	AICE CIMED IG				
L	workers		s; rreatment or articles	-	111331	65901; PRO 70157;		tment of artic	les by dipping	and pouring	AISE_SWED_IS	1 [
L	workers	moustrial uses pouring; medi	s; Treatment of articles um RMM aying; Automated task	by alpping or	111331 111331 <i>miss</i> 111331 111331	55901; PRO 70157; <i>ina</i> 70150; PRO 70578;						ecto	nr-si	necific	
	workers	Industrial uses pouring; medi Industrial spra Long term; wit	s; Treatment of articles um RMM aying; Automated task th LEV aying; Automated task	Open systems;	111331 111331 <i>miss</i> 111331	65901; PRO 70157; <i>ina</i> 70150; PRO 70578; 70150; PRO	C13 - Trea	trial s trial s	S	WE	Ds (s			pecific	
	Workers Workers Workers	Industrial uses pouring; medi Industrial spra Long term; wit Industrial spra Long term; hig	s; Treatment of articles um RMM aying; Automated task th LEV aying; Automated task	open systems; Open system;	111331 111331 <i>miss</i> 111331 111331 101331	65901; PRO 70157; ina 70150; PRO 70578;	C13 - Trea C7 - Indus	trial s trial s ndust	S	WE	Ds (s			pecific scriptio	ns)

SWEDs – A.I.S.E.

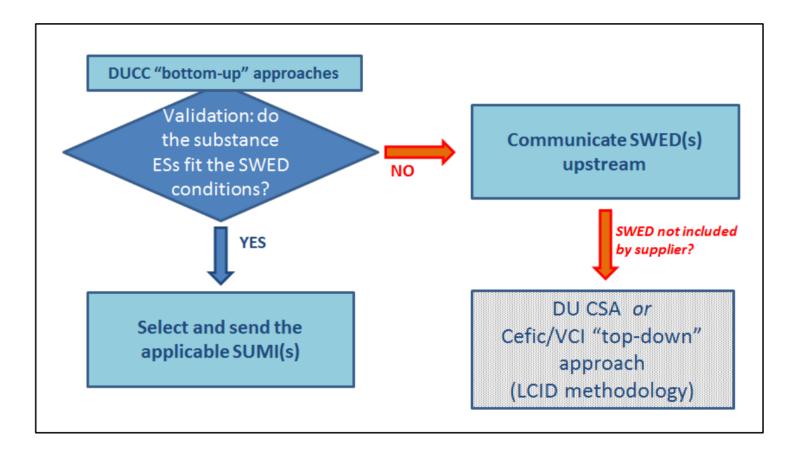
.ink activitie	es to exposure assessment inputs							Additional information	(optional)
Contributing activity (CA) type	-	ph	om standard rase code(s) or CA name		CA descriptor	Exposure assessment i CA	nput code for this	Generic composition I functions; maximum co per technical functio information; o	n; tonnage
Workers	Transfer and dilution of concentrated product by us dedicated dosing system; medium RMM	ing	-	PROC8b - Transfer of and discharging) at	of substance or mixture (charging dedicated facilities	AISE_SWED_IS_8b_1			
Workers	Brushing; Automated task; medium RMM		missing; 133170578; missing	PROC10 - Roller app	lication or brushing	AISE_SWED_IS_10_1			
Workers	Low energy manipulation and handling of substance bound in/on materials or articles	2		. SWEDs					
Workers	Industrial uses; Treatment of articles by dipping or pouring; medium RMM	Row	Version Oct	tober 2016 ield name	AISE SWE	D_IS_8b_1		ATSE SWE	D_IS_10_1
Workers	Industrial spraying; Automated task; Open systems, Long term; with LEV	No.			Field content	Information for communication	Field co		Information for communication
Workers	Industrial spraying; Automated task; Open system; Long term; high RMM	1	SWED ide	ntifiers	Transfer and dilution of				
Environment	t Use at industrial site leading to inclusion into/onto	1.1	SWED title ³		concentrated product by using			; Automated task;	D IS 10 1
Environment	article t Use at industrial site leading to inclusion into/onto article	1.3	Short desc		worker e	Ds (sec [.] xposure	•		
		1.4.1 1.4.2	substance p Short descri during use t	domain (in terms of					
	C	Cor		ons of	dedicated dosing system;		Brushing; medium	; Automated task; RMM	
		1.6a.2 1.7	Last Revisio	n date	medium RMM PROC8b 10/1/2016		PROC10 10/1/201	6	
		2		s of use for input to CSA)	The risk assessor using this		The risk i	assessor using this	

Validation



		Control of w ng (<mark>PROC 1</mark> 0	worker exposure: Roller, spreader, flow application; <mark>10</mark>)				
	Product (Article) characteristics						
	Covers $a_{\rm Am}^{2.2}$	concentrations up t .4. Control o	up to 2.0 % I of worker exposure: <i>Raw material receipt and transfer</i>				
2. ES 2: Use at industrial sites; C	Cov(P)	ROC 8b)					
Se Thinners, paint removers (PC 9a)	Tec Pr	oduct (Article) ch	characteristics OCs & RMMs				
	Loci Co	vers concentration	ons up to 2.0 %				
2.1. Title section	Prov An	nount used (or co	contained in articles), frequency and duration of use/exposure				
	Sup Co	vers use up to 1.0	.0 h/day				
ES name: General Industrial use of coatings and inks Product category: Coatings and Paints, Thinners, paint remover	opei Te	chnical and orga	ganisational conditions and measures				
Environment	Oth Pro	Provide a basic standard of general ventilation (1 to 3 air changes per hour).					
1: Industrial application of coatings and inks involving water	Inde Supervision in place to check that the risk management measures in place are being used correctly and						
2: Industrial application of coatings and inks involving water	Assi operation conditions followed.; Ensure control measures are regularly inspected and maintained.						
3: Industrial application of coatings and inks. Water free	Add Other conditions affecting workers exposure						
Worker	Wea Inc						
w material receipt and transfer	Use As	sumes process tem	emperature up to 40.0 °C				
ixing operations; Open systems		PROC 5					
6: Batch loading of equipment (manual, non dedicated)		PROC 8a					
7: Spraying		PROC 7					
8: Printing closed automated machinery		PROC 10					
9: Roller, spreader, flow application; Printing		PROC 10	All the conditions of use (OCs, RMMs) in a				
10: Dipping, immersion and pouring		PROC 13	SWED (e.g. PROC 8b, PROC 10) are				
11: Film formation - force drying, stoving and other technolog temperature	ies; Eleva	nted PROC 2	covered by the ESs of all the substances				
12: Equipment cleaning and maintenance; Manual		PROC 28	contributing to the mixture classification				

SUMIs



SUMIs – A.I.S.E.



SUMI: Safe Use of Mixtures Information for end-users
AISE_SUMI_13.1.b.v1: Professional use of drain

unblockers

USE, Use of drain unblocking products by profession	al end-users
SWED, This information is link	ed to AISE_SWED_13.1.b.v1
Sector of use (SU): 22 Profession	al
PROC Process Category (PROC) 13 Dipping &	pouring

Operational conditions Maximum duration					
	10 minutes per day.				
Process conditions	Process is carried out at room temperature.				
	In case of dilution, tap water at a maximum temperature of 45 degrees Celcius is used.				
	No LEV needed; good general ventilation at workplace is sufficient.				

	Risk management measures								
RMMs	Conditions and measures related to personal protection equipment (PPE), hygiene and health evaluation and the environment	Use gloves and safety goggles. See Section 8 of the SDS of this product for specifications.							
	Environmental measures	Prevent that the undiluted product reaches surface waters.							

Note: This example is a draft and subject to change.

Good practise advice	
Don't eat or drink, don't smoke, no open flame	$\textcircled{0}{\otimes}$
Wash hands after use Avoid cont act with damaged skin Do not mix with other products	à 🚳 🌠
Spillage instructions	Dilute with water and mop up.
Additional good practice advice	Follow the product instructions as specified on the label or in the product information sheet and use good occupational hygiene practices as specified in Section 7 of the SDS of the used product.
Additional information on product	composition
	ind on the label the classification of the undiluted
	ed on the classified ingredients in the products. All fication of the mixture are mentioned in Section 3 of the
Relevant limit values of the ingredier stated in Section 8 of the SDS.	nts on which the exposure assessment is based, are
	ingredients, that may cause an allegric reaction in states these ingredients, when applicable to the

Disclaimer: This is a generic document for communicating conditions of safe use of a product. If a GEIS code is mentioned in Section 1 of the SDS of a product, the formulator of that product declares that all substances in the mixture are present in such concentration, that the use of the product within the conditions of the GEIS CSP documents is safe, according to the GEIS Formulator Guidance. When available, this safe use is ensured by evaluating the results of the chemical safety assessments aperformed by the raw material suppliers. When no chemical safety assessment has been carried out by the supplier for an ingredient that contributes to the classification of the mixture, the formulator has performed a safety assessment himself.

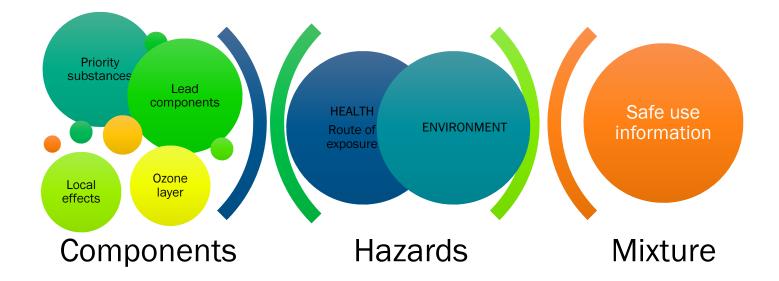
Following Occupational Health legislation, the employer of workers that use products that are assessed as safe following GEIS conditions remains: responsible for communicating relevant use information to employees. When developing workplace instructions for employees, Generic Exposure Information Sheets should always be considered in combination with the SDS and the label of the product. The GEIS Guidance for End Users provides more information.

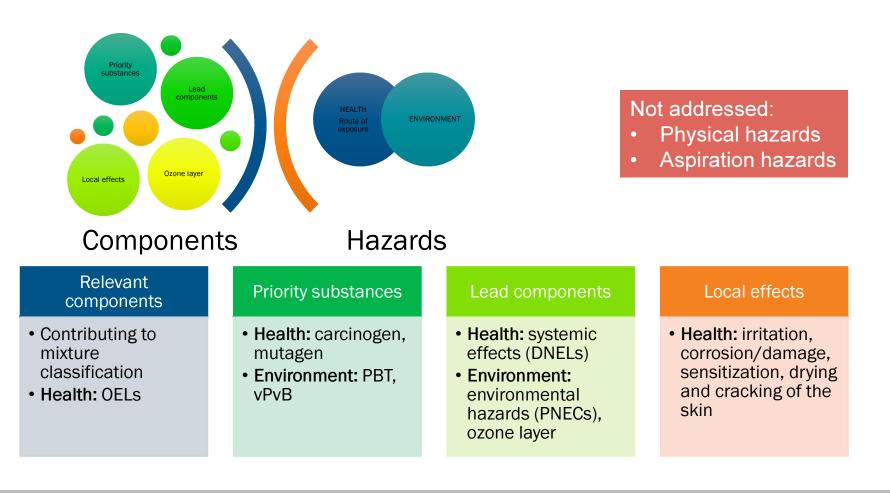
The A.I.S.E. is under no conditions liable for any damage, no matter of what kind, which is the direct or indirect consequence of acts and/or decisions (partly) based on the contents of this document.

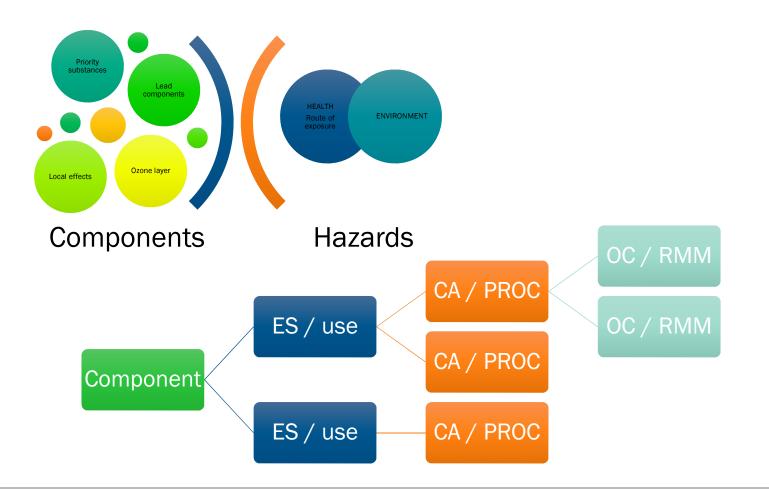
Version: 2.0, May 2015

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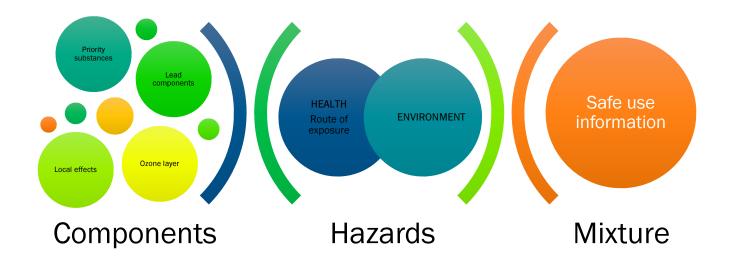
Top-down: LCID (lead component identification)







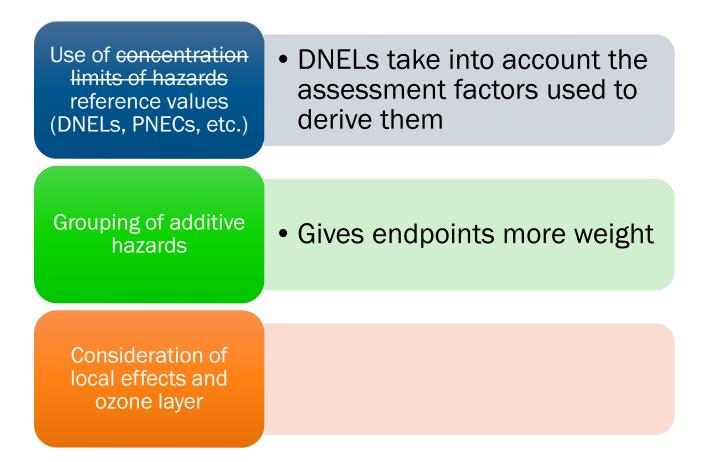
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Mixture

- Worst-case assumption... but coverage checks of OC, RMM for PS, LC, LE
 - All components and/or exposure pathways
 - Components with specific properties not reflected by classification
 - End-uses of mixture

LCID vs. DPD+ methodology



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Lead component indicator (LCI) – Health

Component with highest LCI = LC

 $LCI_{\alpha} = \frac{Conc \text{ in mixture}}{DNEL}$

Not addressed:

 Component interactions (synergistic/potentiating/antagonistic effects)

Additive effects

Acute toxicity (oral, dermal and inhalation) – Categories 1, 2, 3 and 4 STOT SF 3 (dermal and inhalation) – Narcotic effects

$$LCI_{group} = \Sigma LCI_{i} \qquad C_{weighted} = \sum_{i=1}^{\infty} \frac{C_{i} \times DNEL_{LC}}{DNEL_{i}}$$

Lead component indicator (LCI) – Environment

Ozone layer

LCI = Conc in mixture

Environmental hazards

 $LCI = \frac{Conc in mixture}{(lowest PNEC) x 3}$ $LCI = \frac{Conc in mixture}{lowest PNEC}$

for readily biodegradable component

for **not** readily biodegradable component

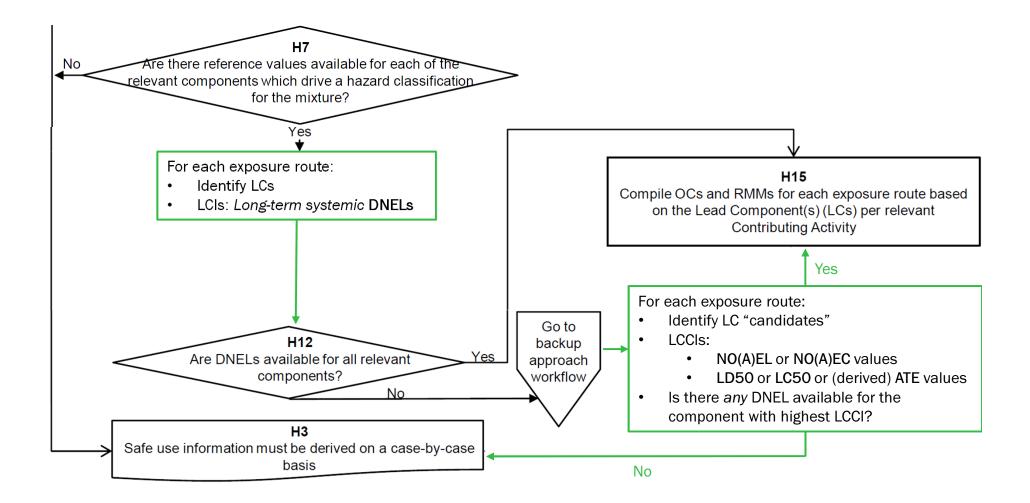


"Calculation according to LCID is possible as long as at least one of the above mentioned values is available for all relevant components"

DNEL, NO(A)EL, NO(A)EC, LD50, LC50, (derived) ATE



Health hazards – Two approaches



Data requirements – Health



 All relevant components, all routes of exposure

LD50/LC50

• All relevant components, all routes of exposure

Derived ATE

• All relevant components, all routes of exposure

DNEL

- Any DNELs for all relevant components
- Long-term systemic DNELs for Lead component indicator (LCI)
- Same species, duration, type, frequency

Data requirements – Environment

PNEC

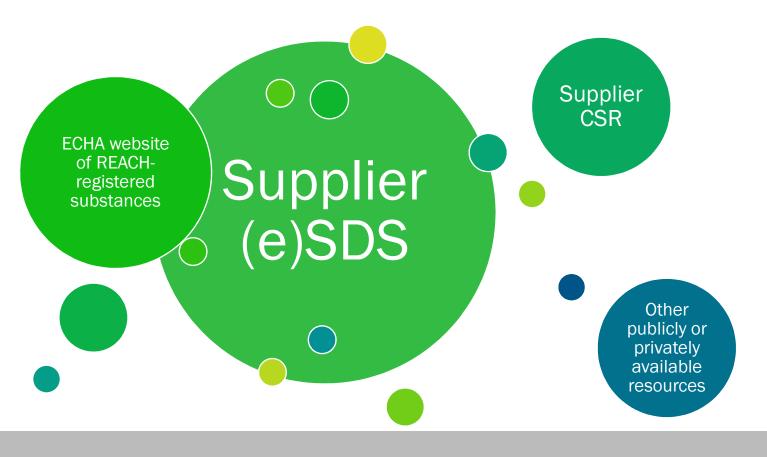
- Any PNECs for all relevant components, any compartment
- Convert to mg/L

Aquatic environment

 Acute/chronic category and Mfactor

Data sources

"The primary source of information should be the supplier's (e)SDS"



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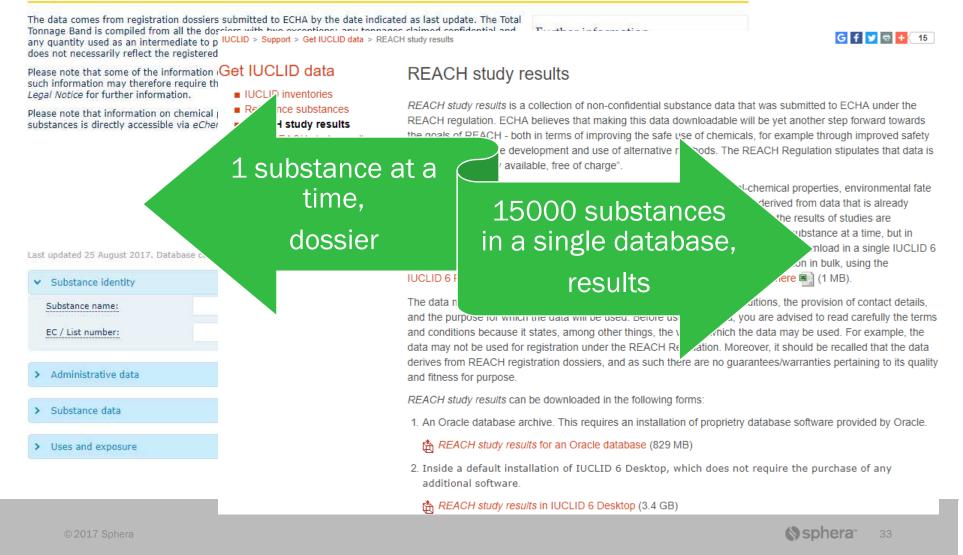
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ECHA website of REACH-registered substances

ECHA > Information on Chemicals > Registered substances

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Registered substances

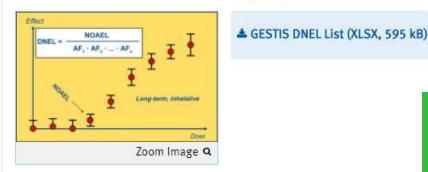


Other publicly or privately available resources

Home > GESTIS > GESTIS DNEL list

GESTIS DNEL List

Hazardous substance information system of the German Social Accident Insurance



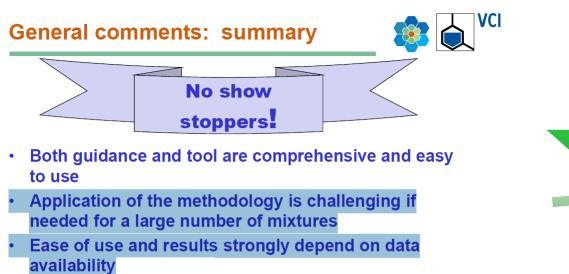
4800 substances, industry-specific

Contents

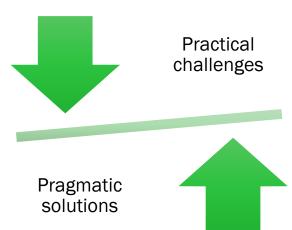
For the registration of each substance under the European chemicals regulation REACH, manufacturers or importers have to quote assessment benchmarks on which the protective measures are based. Among these assessment yardsticks are Derived No-Effect Levels (DNELs). The REACH regulation defines them as exposure levels beneath which a substance does not harm human health.

The GESTIS DNEL list of the German Social Accident Insurance (DGUV) is based on a compilation conducted by the social accident insurance institution for the construction industry which makes available workplace-related DNELs that have been established by manufacturers and importers on their own responsibility and are published in this form by the European Chemicals Agency (ECHA).

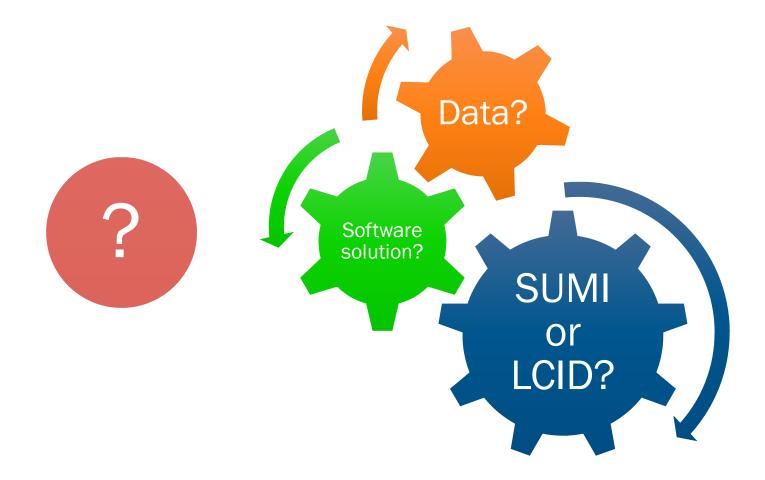
LCID Methodology Guide Update and Preliminary Test Results



- Expert judgment is still necessary
- Need for further IT support of the calculation tool or the separate development of software solutions
- Training workshops would be appreciated



Approaches: UP or DOWN?



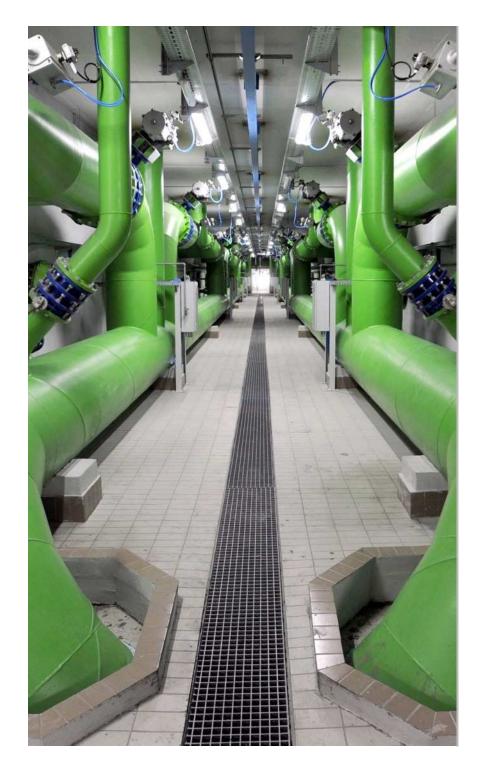
Acronyms

A.I.S.E.	International Association for Soaps, Detergents and Maintenance Products
ATE	Acute Toxicity Estimate
CA	Contributing Activity
Cefic	The European Chemical Industry Council
CEPE	European Council of the Paint, Printing Ink and Artists' Colors Industry
Chesar	Chemical safety assessment and reporting tool
CSA	Chemical Safety Assessment
CSR	Chemical Safety Report
DNEL	Derived No-Effect Level
DU	Downstream User
DUCC	Downstream Users of Chemicals Co-ordination group
ECHA	European Chemicals Agency
ENES	Exchange Network on Exposure Scenarios
ES	Exposure Scenario
ESCom	Exposure Scenario Communication
eSDS	extended Safety Data Sheet
IUCLID	International Uniform ChemicaL Information Database
LC	Lead Component
LCI	Lead Component Indicator
LCCI	Lead Component Candidate Indicator

LCID	Lead Component Identification (methodology)
LC50, LD50	Lethal Concentration, Dose 50
LE	Local Effect
NO(A)EC, NO(A)EL	No Observed (Adverse) Effect Concentration, Level
OC	Operational Condition
OEL	Occupational Exposure Limit
РВТ	Persistent, Bioaccumulative and Toxic substance
PNEC	Predicted No-Effect Concentration
PROC	Process Category
PS	Priority Substance
REACH	Registration, Evaluation, Authorization and Restriction of Chemicals Regulation (EC) No 1907/2006
RMM	Risk Management Measure
SCED	Specific Consumer Exposure Determinant
SDS	Safety Data Sheet
SpERC	Specific Environmental Release Category
SUMI	Safe Use of Mixtures Information
SWED	Sector-specific Workers Exposure Description
VCI	Verband der Chemischen Industrie e.V. (the German chemical industry association)
vPvB	very Persistent and very Bioaccumulative substance

References

ECHA	https://echa.europa.eu/regulations/reach An illustrative example of the exposure scenarios to be annexed to the safety data sheet
ENES	https://echa.europa.eu/about-us/exchange-network-on-exposure-scenarios
CSR/ES roadmap	https://echa.europa.eu/regulations/reach/registration/information-requirements/chemical- safety-report/csr-es-roadmap
IUCLID 6	https://iuclid6.echa.europa.eu/
Chesar	https://chesar.echa.europa.eu/
ESCom	http://www.cefic.org/Industry-support/Implementing-reach/escom/
DUCC	Sector-specific approaches towards developing and communicating information for the safe use of mixtures SUMI template
Use maps	https://echa.europa.eu/csr-es-roadmap/use-maps/concept
Cefic	http://www.cefic.org/Industry-support/Implementing-reach/Guidances-and-Tools1/
LCID methodology	REACH Practical Guide on Safe Use Information for Mixtures under REACH: The Lead Component Identification (LCID) Methodology
Registered substances	https://echa.europa.eu/information-on-chemicals/registered-substances
REACH study results	https://iuclid6.echa.europa.eu/reach-study-results
GESTIS DNEL List	http://www.dguv.de/ifa/gestis/gestis-dnel-liste/index-2.jsp



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