International Association for Soaps,
Detergents and Maintenance Products

A.I.S.E. SUMI webinar

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Topics Overview

- Introduction
- Roles and Obligations under REACH
- Communication in the Supply Chain
- A.I.S.E. SUMIs
- Using the SUMIs: the Role of Formulators
- Next Steps
- Q&A

www.aise.eu

A·I·S·E

International Association for Soaps,
Detergents and Maintenance Products

ROLES AND OBLIGATIONS UNDER REACH

AISE WEBINAR

Sonia Benacquista (AFISE)

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Registrants and DUs in the registration process

Manufacturers / importers (Registrants)

- In charge of compiling the information on hazardous properties and uses for all individual substances they register
- In charge of assessing that all the uses described in the registration dossier (with associated RMM and OC) are safe throughout the whole lifecycle of the substance

Downstream users

- Are encouraged to communicate information on uses so that the registrant has the most relevant information in order to carry out the safety assessment

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The Chemical Safety Assessment (CSA)

- For each substance registered > 10t/y and classified as dangerous or PBT/vPvB, the CSA included in the registration dossier shall include:
  - An exposure assessment with risk characterisation *(article 14(4))*

- Registrants are responsible for assessing all **identified** uses of their substances throughout the supply chain, based on use information provided by downstream users *(article 37(2))*

- The outcome of the CSA shall result in Exposure Scenarios (ES) provided to downstream users as SDS attachments

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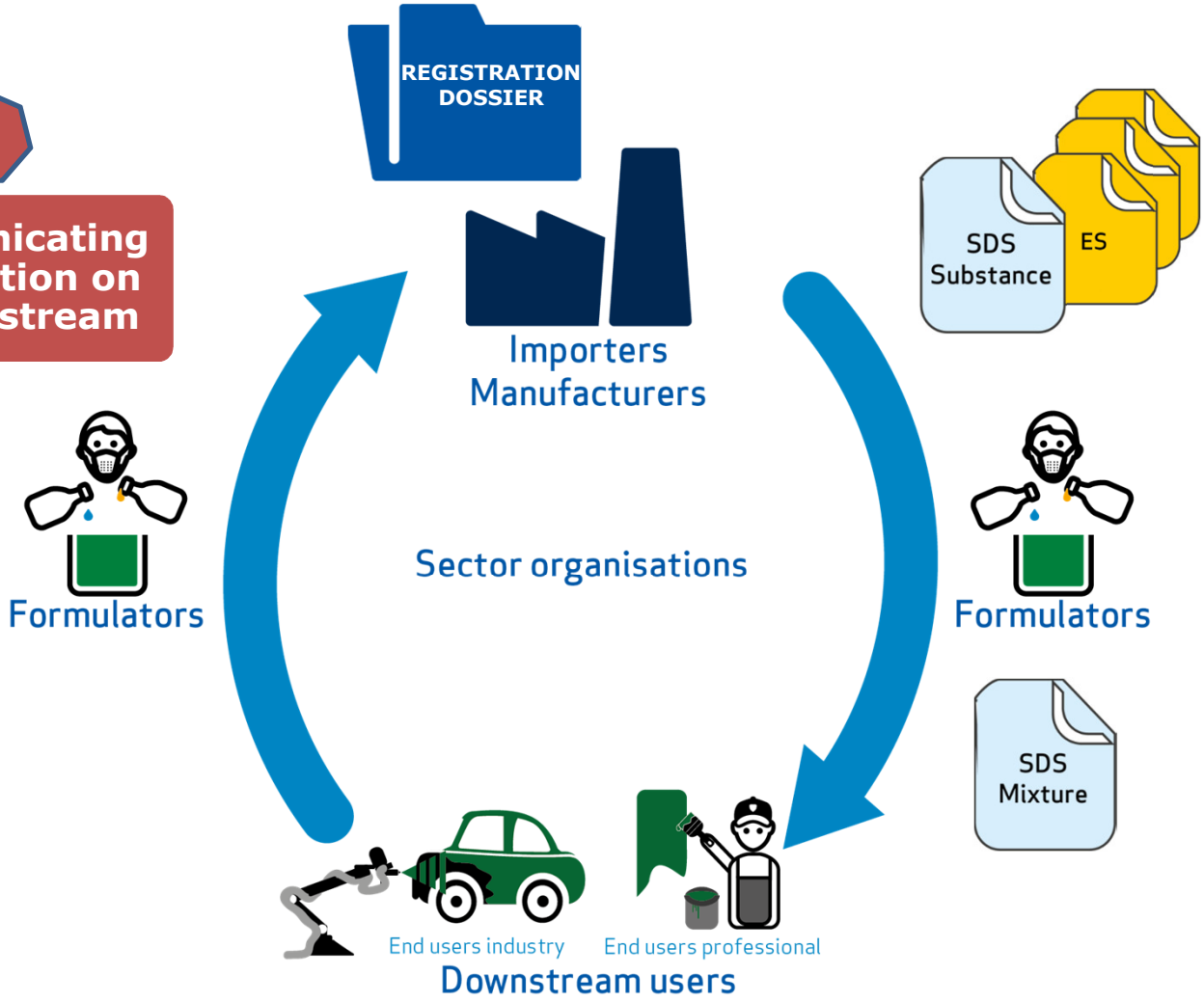
Supply chain communication : formulators role under REACH

1

Communicating information on uses upstream



2

Checking SDS and ES from suppliers and communicating information on safe use downstream

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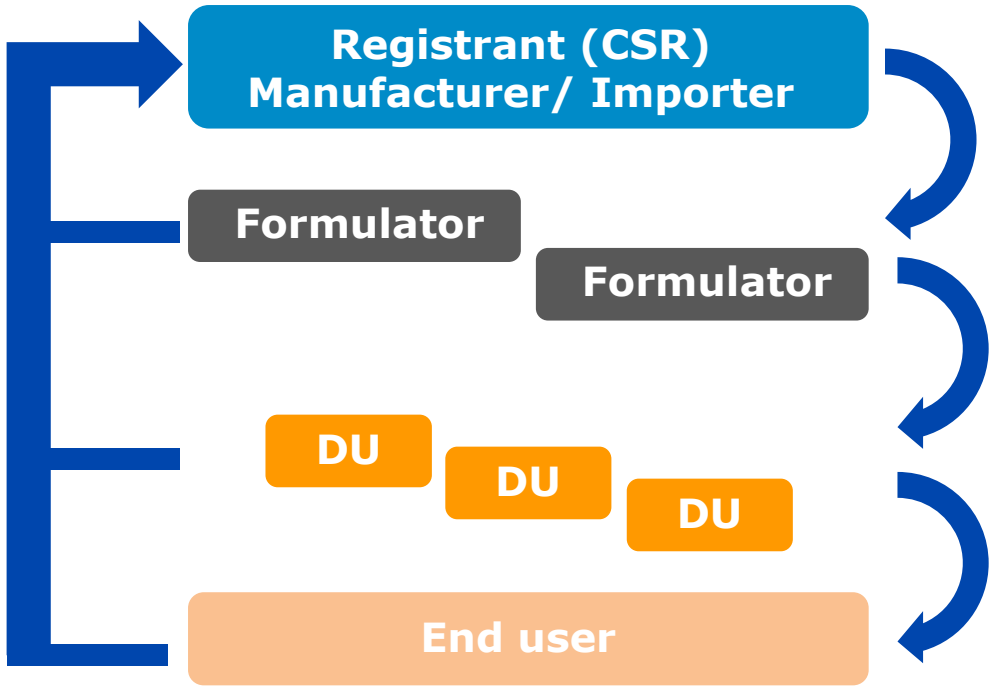
Communication flow in the supply chain

Upstream

Downstream



Communication on uses to the registrant

Communication on safe use to downstream users

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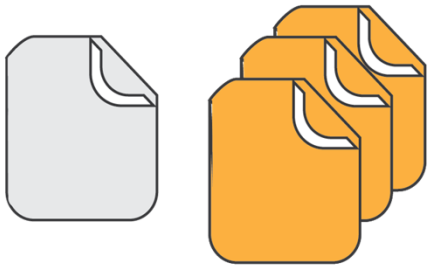
Communication up the supply chain

Registrants



Chemical Safety Report
Exposure Scenarios

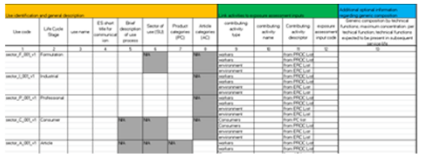
Information on uses

Direct communication to the supplier

or

Via sector organisations

Sector Use Maps



Customers (Downstream users)

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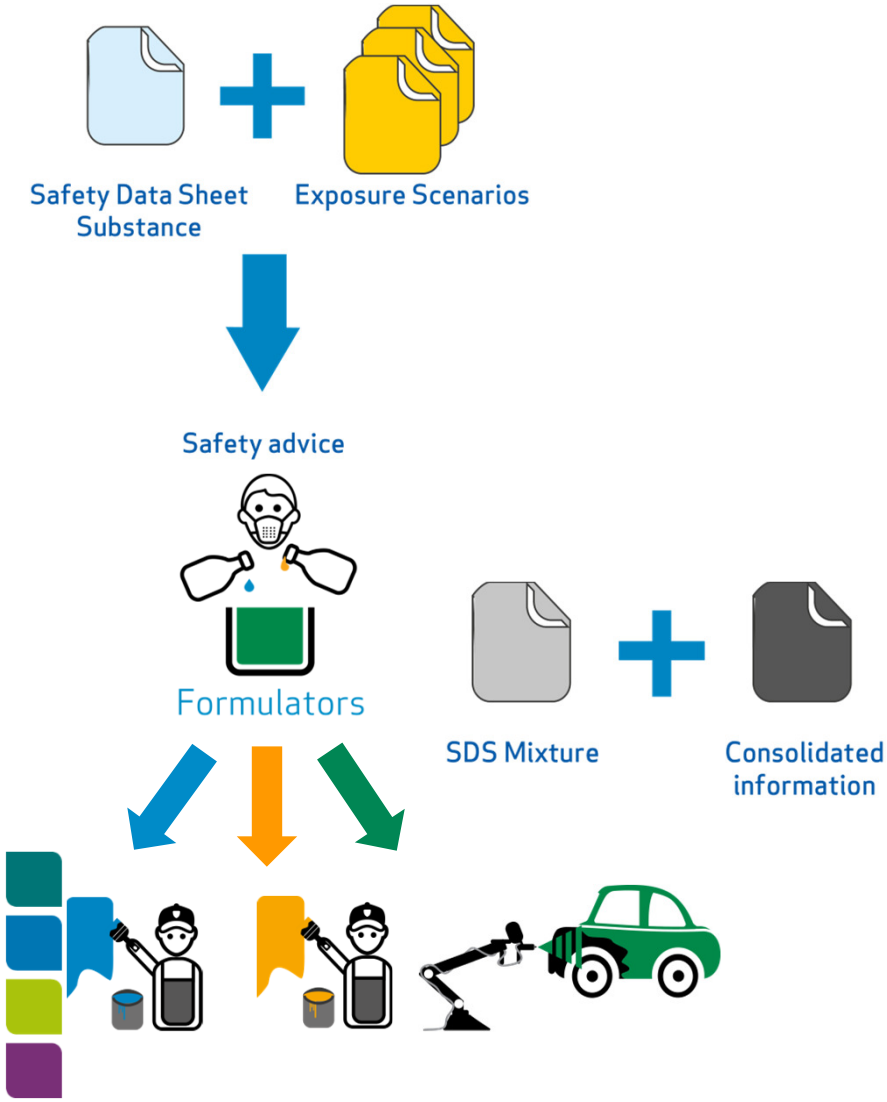
Communication down the Supply Chain - The formulator's role



- Formulator receives extended safety data sheets for substances from his suppliers
- Identifies and consolidates relevant advice to provide for safe use of the mixture
- Provides safety data sheets for hazardous mixtures to downstream users, together with consolidated information on safe use
- Customers receive clear, relevant information so they can use the mixtures safely

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What to do when you receive ES and you are a formulator

Check that your use and customer use is covered

- Check if you have received ESs covering your use and uses by your customers

Provide a SDS to downstream users for a hazardous mixture

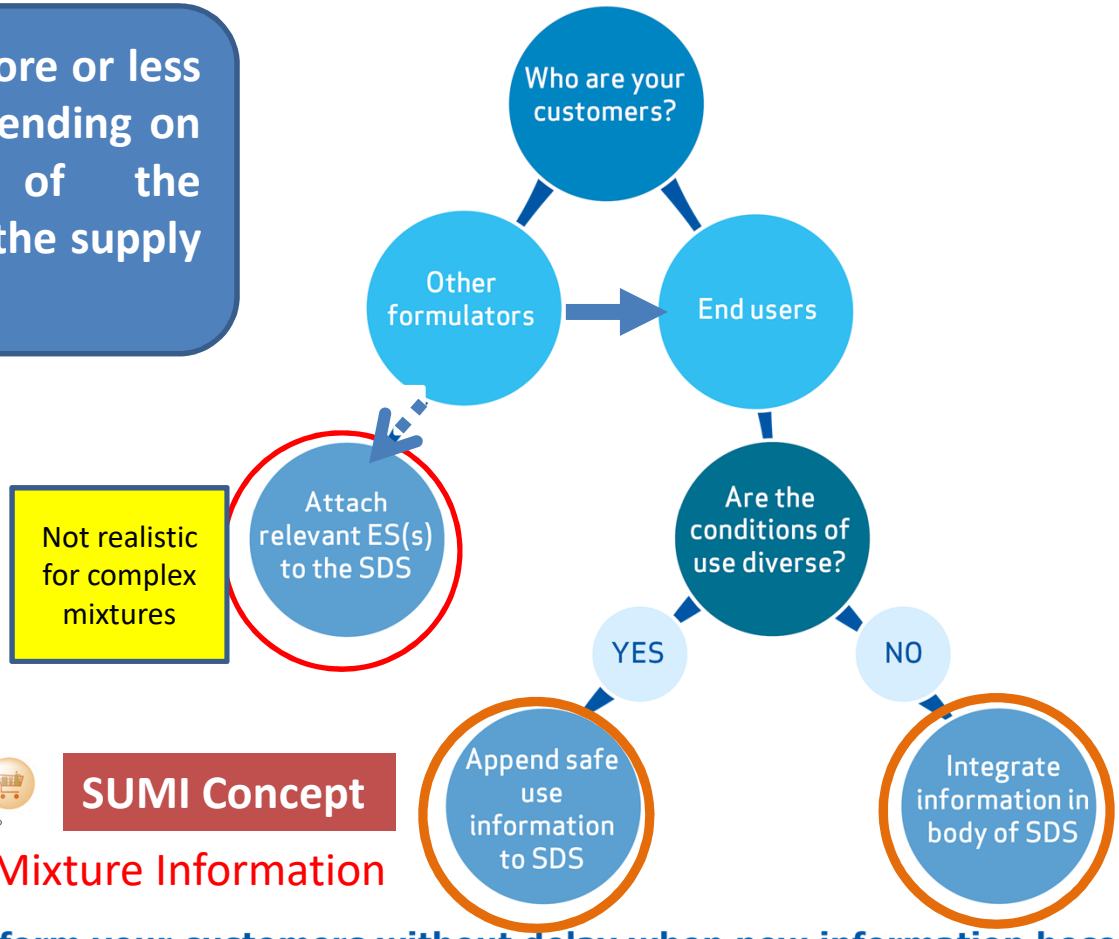
- Provide on request, if mixture is non-classified and contains certain substances above specified limits

Communicate information on safe use of the mixture from ES

- You have several options

The 3 options for Mixtures

3 options, more or less relevant depending on the role of the customer in the supply chain



SUMI Concept

Safe Use Mixture Information

Inform your customers without delay when new information becomes available

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GS2

International Association for Soaps,
Detergents and Maintenance Products

COMMUNICATION IN THE SUPPLY CHAIN

AISE WEBINAR

Patrick Verhelle (DETIC)

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Slide 12

GS2 CSR Roadmap, ENES, Use maps anh the SUMI option.

Giulia Sebastio, 05/11/2018

Webinar Outline

- **Use maps**
  - ✓ENES
  - ✓CSR Roadmap
  - ✓Bottom-up approach
  - ✓SWED's
- **3 options for Mixtures → SUMI's**
- **Description of Use**
- **Description of the documents**

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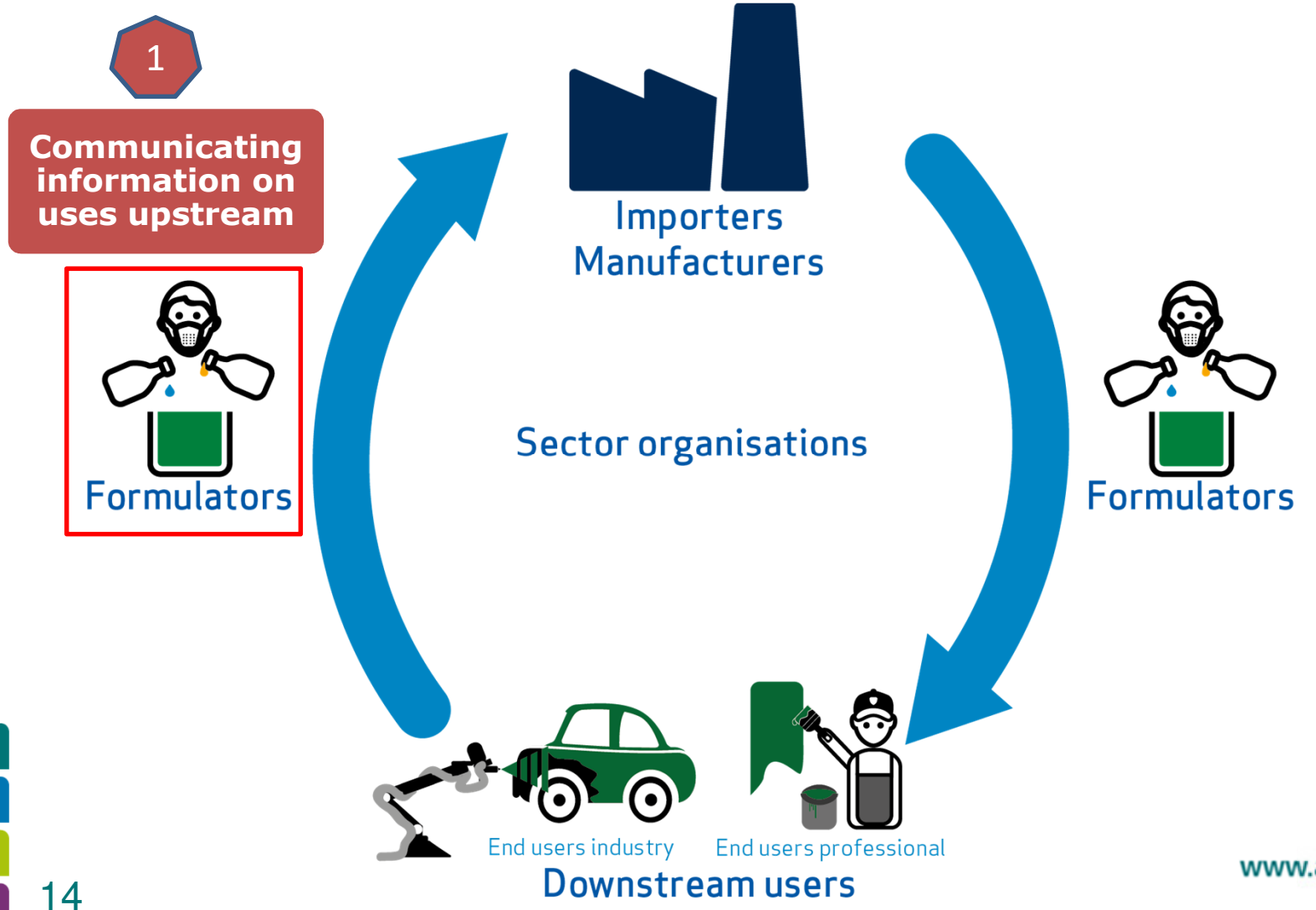
Supply chain UP-stream communication
Formulators role under REACH



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Use Maps

Involvement of sector organisations

To close this gap and ensure that registrants have this important information available, a network of experts (ENES [1], Exchange Network on Exposure Scenarios) has **included the sector organisations in this part of the communication chain.**

In particular, this was done by analysing and standardising the descriptions of **all known (PC&H) end-uses in each sector in the so-called specific Use Map.**

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(1)

Exchange Network Exposure Scenarios

- **ENES** is a collaborative **network**
- Established by **ECHA** together with most sector **ORGANISATIONS** (DUCC, AISE, etc.)
- Identifying **GOOD PRACTICES** on preparing and implementing Exposure Scenario's
- Develop **EFFECTIVE COMMUNICATION EXCHANGE** between **ALL** supply chain actors (manufacturer, **formulator**, user, authorities)

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Use Maps

Way of working …

Since 2009, A.I.S.E. has been gathering information within its membership to identify **all uses of a substance** in Cleaning & Maintenance products to ensure that the **REACH risk assessment is appropriate and accurate.**

The analysis of the professional uses has been done through cooperation with an independent research organisation (TNO), experts from several cleaning companies and supported by **several formulators active in the PC&H (B2B) sector.**

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Use Maps

Way of working …

During the last years a lot of work has been done also in the context of the CSR/ES Roadmap to harmonize the use description based on the ECHA use descriptor system (updated in Dec 2015) and, where possible, on ESCom standard phrases.

In the last years many tools have been made available or updated to prepare for the 2018 REACH Registration deadline, including the **ESCom Package 2.0** and a harmonized Improved **Use Maps template.**

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Use Maps

Way of working …

Like the older tables of uses, USE MAPS cover the vast majority (> 80 %) of the products' uses identified by A.I.S.E. members, both large and small companies. However, following the questions and the comments received over the years, the team preparing the improved use maps tried to simplify as much as possible the descriptions and the grouping of the different activities. **This simplification aims at ensuring that these use maps can cover effectively a wide range of applications, regardless of the size of the company and of the specificity of the market – and, therefore, products' use - in the different EU countries.**

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Use Maps

Way of working …

The A.I.S.E. work resulted initially in more than **150 different uses**, which have been **aggregated after a grouping exercise.**

The **improved A.I.S.E. use maps** V1.1 were published at the end of 2017 and were

- incorporated to the template,
- discussed and agreed on,

In the context and in line with the

CSR/ES roadmap 2018 (2)

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(2) REACH CSR/ES Roadmap 2018

- 5 years plan for improving the **content and use of ES**
- Jointly developed by **ECHA and stakeholder organisations**
- Commitment **charter signed** to this collaborative effort
- **Support development and implementation** of the actions laid down in the roadmap.

Objective:

Generate and communicate clear information on safe use conditions for chemicals through the supply chain

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ECHA CSR/ES Roadmap 2018

Member States Competent Authorities Representatives: DE (BAuA, Bfr, UBA), GR, FR, IT, NL, PL, RO, UK, FI

A.I.S.E. active participation under DUCC coordination

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Use Maps

Way of working …

Registrants were encouraged to consider the UM as representative for the sector when they prepare their registration dossiers.

Also, for the same activity, e.g. spraying of a product, the use maps could list the different combinations of **Risk Management Measures** and **Operational Conditions** that can occur on the market depending on several factors, e.g. CLP classification of the product

(see SWEDs section for more details).

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Use Maps

Way of working …

To make an efficient use of such information, registrants are encouraged to **base their risk assessment** on the less stringent conditions, e.g. in the absence of RMMs if it occurs.

If safe use can be demonstrated under these conditions, also more stringent conditions of use are considered covered.

Differently, if safe use **cannot be demonstrated**, other stricter scenarios should be considered and communicated to the DUs accordingly via the ESs.

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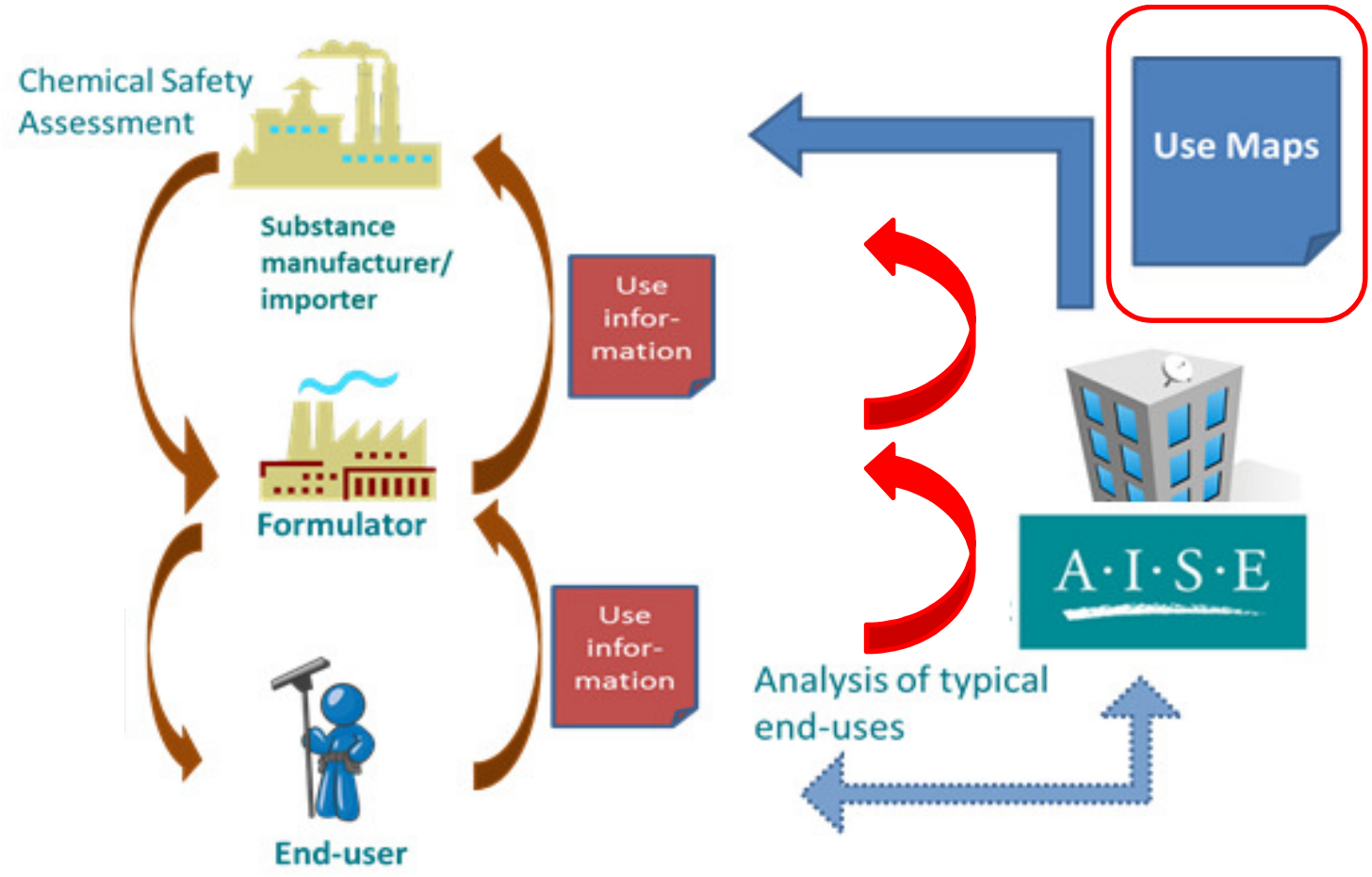
Communication UP the supply chain via USE MAPS



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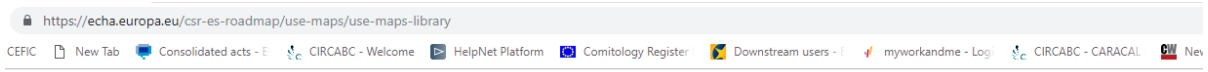
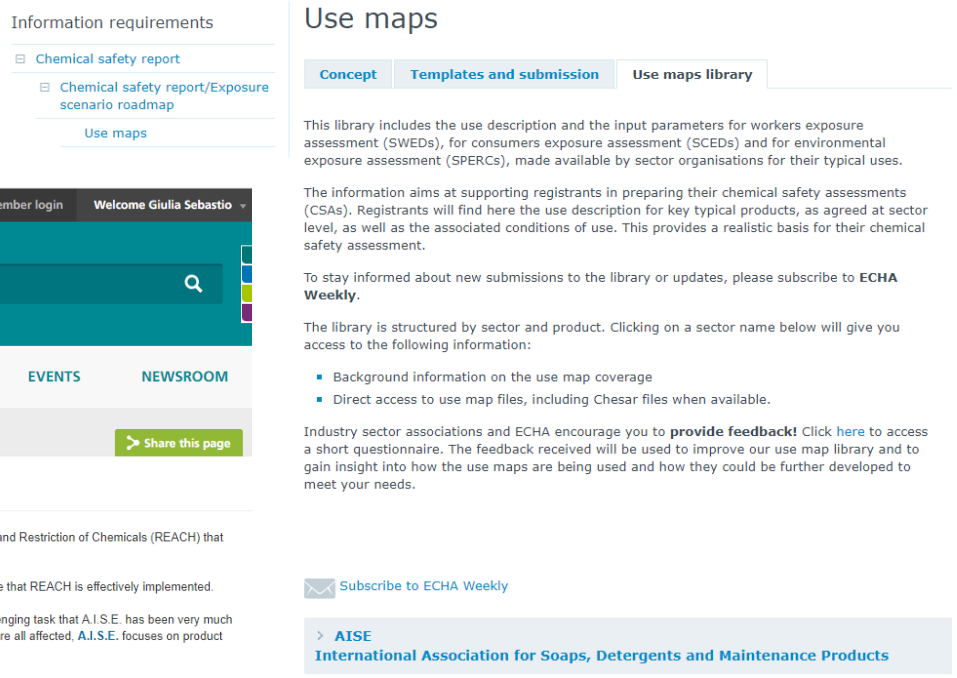
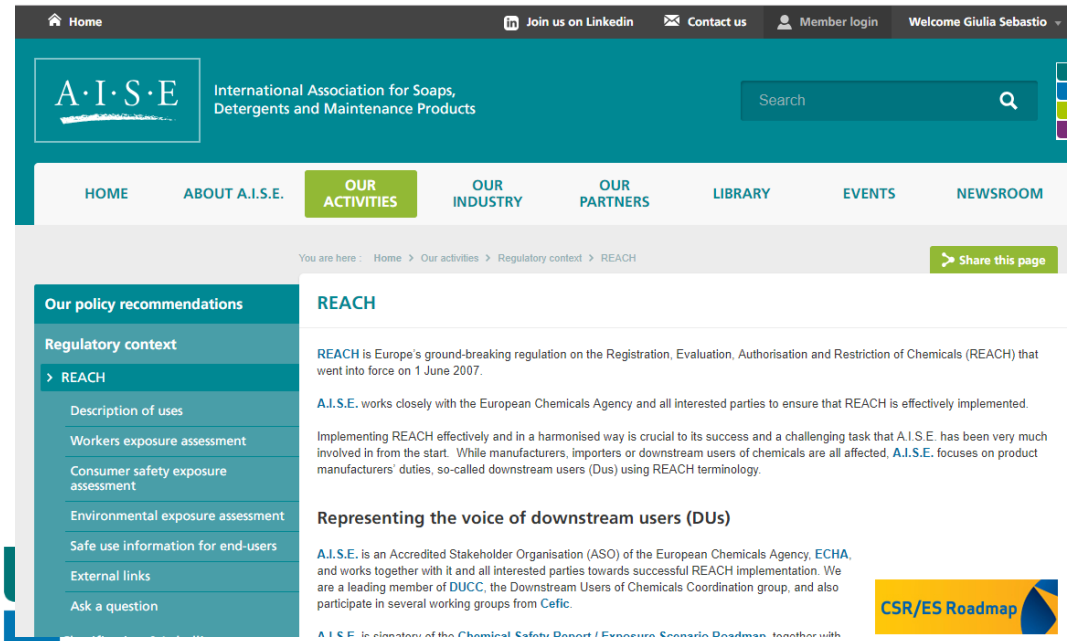
Communication UP the supply chain via USE MAPS







All USE MAPs and SWEDs are available at the [A.I.S.E. website] and the [ECHA Use Map Library.]

www.aise.eu

USE MAPs Benefits (for registrants)

- **Detailed information on actual use** (Realistic)
  - ✓ Reliable Chemical Safety Assessments (CSA)
- **Harmonized information format**
  - ✓ Harmonization between most industry sectors
- **Standardized format enables automation of assessments**
  - ✓ Saving time and resources

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USE MAPs Benefits (for formulators)

- **Reliable, high-quality exposure scenarios**
- **Realistic use conditions described**
- **Standardized communication to end-users possible**
  - ✓ Safe Use of Mixtures Information (SUMI)

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USE MAPs Benefits (Downstream Users)

- **Reliable, realistic conditions of safe use**
- **Standardized, harmonized communication between suppliers**
  - ✓SUMIs, tailored information for end-users
- **Using the results of a chemical safety assessment done at manufacturer level**
  - ✓ Dutch OHS inspectorate: *A.I.S.E. SUMIs can be used as a basis for the (OHS) chemical risk assessment (translation to practice required)*

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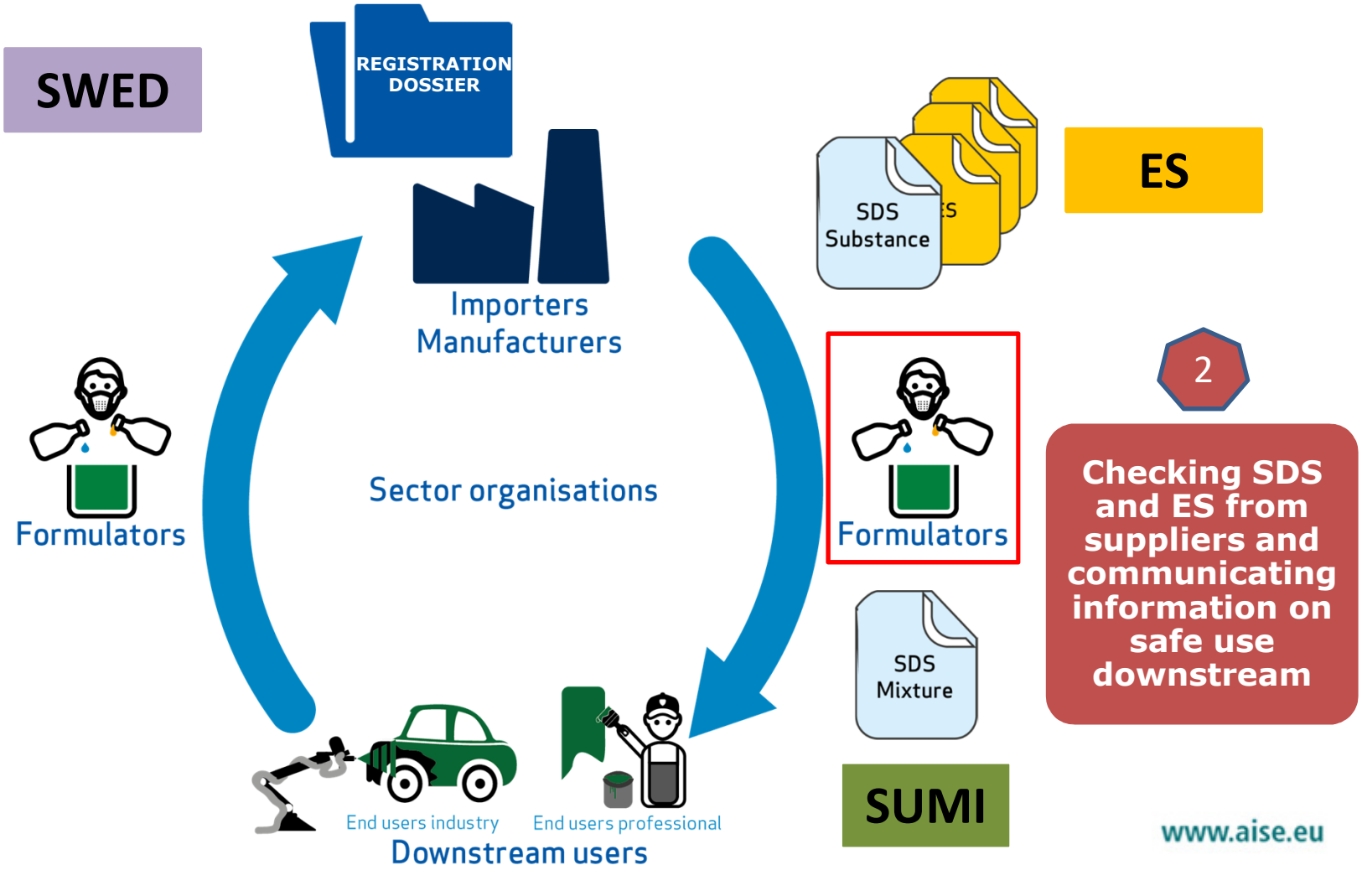
Supply chain DOWN-stream communication
Formulators role under REACH



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The Bottom-Up approach

The ‘bottom-up’ approach originated by DUCC has as **starting point,** the information on the uses of the mixtures and includes **two elements** to assist formulators with communication:

upstream communication of use conditions in the form of the **Sector - specific Worker Exposure Descriptions** [SWEDs] included in Use Maps

and Safe Use of Mixture Information [SUMIs] for **downstream communication** - both within the existing boundaries of REACH.

SUMIs and SWEDs are therefore an integral part of this so-called bottom-up approach.

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The Bottom-Up approach

Tools developed by sector organisations, however, are a **support to formulators** and do not replace the duty to **verify the information received from supplier(s)** and to select the applicable instructions for safe use towards its end-users.

In fact, the formulator shall check that all the substances in the product are:

- ✓ In **such a concentration** that they do not pose a risk to the person working with the mixture, or
- ✓ The substances can be safely used within the conditions of the **relevant SWED**.

This check has to be performed for all SWEDs for which the product is suitable!

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The Bottom-Up approach

The formulator then **mentions all SWED codes for which he has done the assessment** and determined that those **uses are safe for all relevant dangerous substances** in the product.

In a next step all SUMIs linked to those assessed **SWEDs** then have to be communicated down the supply chain in accordance with the REACH requirements and prescribed in the **ECHA Downstream User guidance** [3].

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(3) ECHA Downstream User GUIDANCE
The 3 options for Mixtures

*"The process of communication in the supply chain, should be **as efficient as possible**, proportionate to the risk, and **relevant** and **UNDERSTANDABLE** to the recipients."*

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Explanation of the SWEDs

SWED

Sector-specific Worker Exposure Description

- Describe the typical use conditions of mixtures by workers
- Are an element of the use maps
- Template is published
- It is the **input** information **for registrants** to perform a CSA / Workers' Exposure (i.e. provides the exposure determinants)

Sector association

Formulator

1. **To check SWEDs *vs.* incoming ES for substances**
2. **To communicate downstream the appropriate SUMI**

- Based on SWED → the **output** of the assessment, containing simple advice to the **professional** or **industrial end-user**
- One SWED ⇔ One SUMI
- Are **use oriented** and not specific for a product
- To be integrated within *or* appended to the SDS of mixtures (1- or 2-pager)

SUMI

Safe Use of Mixtures Information

www.aise.eu

The 3 options for Mixtures

REACH COMMUNICATION in the SUPPLY CHAIN:

- Relevant **SUBSTANCE** information need to be provided **DOWN** the **SUPPLY CHAIN** via **SDS** and **EXPOSURE SCENARIOS.**

- **SAFE USE** of SUBSTANCES needs to be ensured during its **WHOLE LIFE CYCLE.**

- **COMMUNICATION** between downstream users and suppliers is **KEY**

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The 3 options for Mixtures

COMMUNICATING Exposure information

Possibilities:

1. **ATTACH** relevant exposure Scenarios for all the substances in the mixture **ANNEXED** to the **SDS**
2. **INTEGRATE** information into the **BODY** of **SDS**
3. **APPEND Safe Use** information for the Mixture

Mentioning all the SUMI codes in Section 1.2 of SDS

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The bottom-up approach

The formulator then **mentions all SWED codes for which he has done the assessment** and determined that those **uses are safe for all relevant dangerous substances** in the product.

SUMIs linked to those assessed **SWEDs then have to be communicated down the supply chain in accordance with the REACH requirements.**

- **Preferably appended** to SDS

  or
- **Eventually integrated** in the core sections of SDS

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A.I.S.E. SUMIs

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Slide 39

GS2 CSR Roadmap, ENES, Use maps anh the SUMI option.

Giulia Sebastio, 05/11/2018

SUMI_IS_7_1

Example

(Recto)

Translation in EU languages!

SUMI

Safe Use of Mixtures Information

AISE_SUMI_IS_7_1

Version 1.0, June 2018

Industrial spraying; Automated task; Open systems; Long term (LEV)

This document is intended to communicate the conditions of safe use for the product and should always be read in combination with the product's Safety Data Sheet and labels.

General description of the process covered

This SUMI applies to professional uses where articles are treated by dipping or pouring. This Safe Use Information is based on the **AISE_SWED_IS_7_1**.

Operational Conditions

Maximum duration	480 minutes per day.
Range of application / Process conditions	Indoor Use.
	Process carried out at room temperature.
	In case of dilution, tap water at a maximum temperature of 45°C is used.
Air exchange rate	LEV required.

Risk Management Measures

Measures related to personal protective equipment (PPE), hygiene and health evaluation	Wear suitable gloves. See section 8 of the SDS of this product for specifications. 
	Training of workers in relation to proper use and maintenance of PPEs must be ensured.
Environmental measures	Prevent that undiluted product reaches surface waters.
	If appropriate AISE SPERC 8a.1.a.v2 may apply: wide dispersive use resulting in release to municipal sewage treatment plant.

SUMI_IS_7_1

Example

(Verso)

Translation in EU languages!

Additional good practice advice

Don't eat or drink. **Don't smoke.** **Don't use in proximity of open flame.**	
Wash hands after use. **Avoid contact with damaged skin.** **Do not mix with other products.**	
Spillage instructions	Dilute with fresh water and mop up.
Hygiene practices	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 product SDS.

Additional information depending on product composition

The label and (when required) the Safety Data Sheet contain additional, product specific information crucial for working safely with mixtures. Please refer to the product label and SDS for information including, but not limited to: product hazard classification, potentially allergenic fragrances, notable ingredients and threshold limit values (when available).

Disclaimer

This is a document for communicating generic conditions of safe use of a product. It is the responsibility of the formulator to link this SUMI to the SDS of a specific product that he is selling.
If a SUMI (or associated SWED) code is mentioned in 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 SUMI is safe. When available, this safe use is ensured by evaluating the results of the chemical safety assessments as performed 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 SUMI conditions remains responsible for communicating relevant use information to employees. When developing workplace instructions for employees, SUMI Sheets should always be considered in combination with the SDS and the label of the product.
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SUMI_IS_7_2_G

Example

(Recto)

Translation in EU languages!

SUMI

Safe Use of Mixtures Information

AISE_SUMI_IS_7_2_G

Version 1.0, June 2018

Industrial spraying; Automated task; Open system; Long term

This document is intended to communicate the conditions of safe use for the product and should always be read in combination with the product's Safety Data Sheet and labels.

General description of the process covered

This SUMI applies to professional uses where articles are treated by dipping or pouring. This Safe Use Information is based on the **AISE_SWED_IS_7_2.**

Operational Conditions

Maximum duration	240 minutes per day.
Range of application / Process conditions	Indoor Use.
	Process carried out at room temperature.
	In case of dilution, tap water at a maximum temperature of 45°C is used.
Air exchange rate	Provide a basic standard of general ventilation (1 to 3 air changes per hour). No LEV required.

Risk Management Measures

Measures related to personal protective equipment (PPE), hygiene and health evaluation	Wear suitable gloves and eye protection. Wear suitable respiratory equipment. See section 8 of the SDS of this product for specifications. 
	Training of workers in relation to proper use and maintenance of PPEs must be ensured.
Environmental measures	Prevent that undiluted product reaches surface waters.
	If appropriate AISE SPERC 8a.1.a.v2 may apply: wide dispersive use resulting in release to municipal sewage treatment plant.

SUMI_IS_7_2_G

Example

(Verso)

Translation in EU languages!

Additional good practice advice

Don't eat or drink. **Don't smoke.** **Don't use in proximity of open flame.**	
Wash hands after use. **Avoid contact with damaged skin.** **Do not mix with other products.**	
Spillage instructions	Dilute with fresh water and mop up.
Hygiene practices	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 product SDS.

Additional information depending on product composition

The label and (when required) the Safety Data Sheet contain additional, product specific information crucial for working safely with mixtures. Please refer to the product label and SDS for information including, but not limited to: product hazard classification, potentially allergenic fragrances, notable ingredients and threshold limit values (when available).

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SUMI_PW_11_32_G

Example

(Recto)

Translation in EU languages!

SUMI

Safe Use of Mixtures Information

AISE_SUMI_PW_11_3_G

Version 1.0, June 2018

Professional uses; Spraying

This document is intended to communicate the conditions of safe use for the product and should always be read in combination with the product's Safety Data Sheet and labels.

General description of the process covered

This SUMI applies to professional uses where articles are treated by dipping or pouring. This Safe Use Information is based on the **AISE_SWED_PW_11_3**.

Operational Conditions

Maximum duration	480 minutes per day.
Range of application / Process conditions	Indoor Use.
	Process carried out at room temperature.
	In case of dilution, tap water at a maximum temperature of 45°C is used.
Air exchange rate	Provide a basic standard of general ventilation (1 to 3 air changes per hour). No LEV required.

Risk Management Measures

Measures related to personal protective equipment (PPE), hygiene and health evaluation	Wear suitable gloves and eye protection. See section 8 of the SDS of this product for specifications. 
	Training of workers in relation to proper use and maintenance of PPEs must be ensured.
Environmental measures	Prevent that undiluted product reaches surface waters.
	If appropriate AISE SPERC 8a.1.a.v2 may apply: wide dispersive use resulting in release to municipal sewage treatment plant.

SUMI_PW_11_32_G

Example

(Verso)

Translation in EU languages!

Additional good practice advice

Don't eat or drink. **Don't smoke.** **Don't use in proximity of open flame.**	
Wash hands after use. **Avoid contact with damaged skin.** **Do not mix with other products.**	
Spillage instructions	Dilute with fresh water and mop up.
Hygiene practices	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 product SDS.

Additional information depending on product composition

The label and (when required) the Safety Data Sheet contain additional, product specific information crucial for working safely with mixtures. Please refer to the product label and SDS for information including, but not limited to: product hazard classification, potentially allergenic fragrances, notable ingredients and threshold limit values (when available).

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SUMI - DUCC © Pictogram

Downstream Users of Chemicals Co-ordination group

Contact Members login Search

A joint platform of European associations whose member companies use chemicals to formulate mixtures (as finished or intermediary products) for professional and industrial users, as well as for consumers.

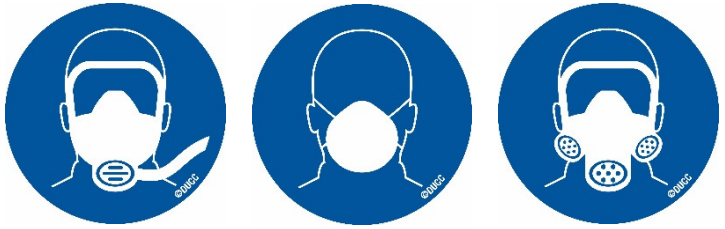
Guidance & Tools

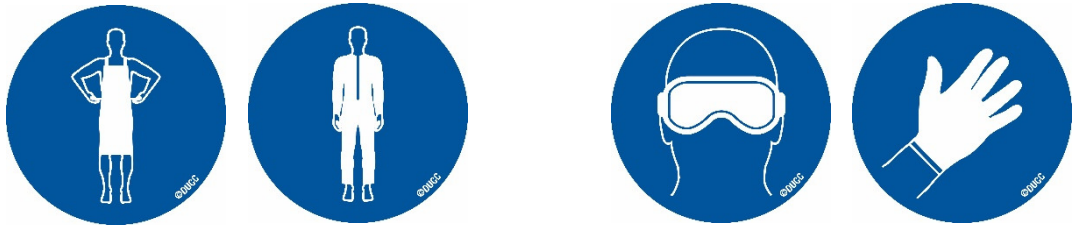
DUCC and its member associations are involved in the development of industry practical guidance, in all REACH and CLP topics that are considered relevant for the smooth implementaton of these Regulations. In many cases such documents are the outcome of projects (industry projects or projects in the context of CSR/ES Roadmap) or internal discussions (sometimes involving other industry partners).

2018

- **DUCC SUMI Pictograms** - please read the Disclaimer and Terms and Conditions of Use before making use of these files

Pictogram	JPG	PDF	PNG
Air Fed Mask	AFM1	AFM2	AFM3
Apron	A1	A2	A3
Dust Mask	DM1	DM2	DM3
Filter Mask	FM1	FM2	FM3
Gloves	G1	G2	G3
Goggles	GG1	GG2	GG3
Protective Clothing	PC1	PC2	PC3





http://www.ducc.eu/Publications.aspx (Guidance & Tools)

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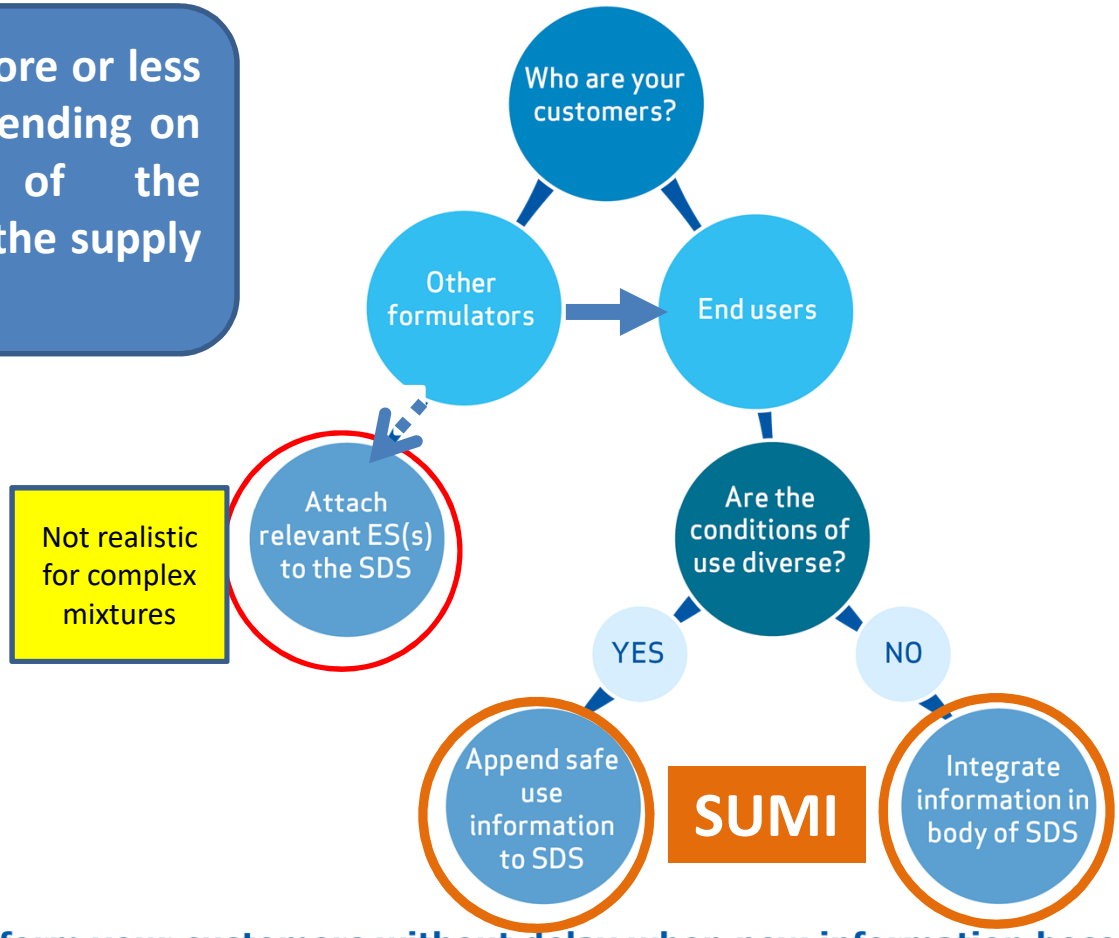
The 3 options for Mixtures

3 options, more or less relevant depending on the role of the customer in the supply chain



Inform your customers without delay when new information becomes available

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International Association for Soaps,
Detergents and Maintenance Products

SUMIs: the role of formulators

AISE WEBINAR

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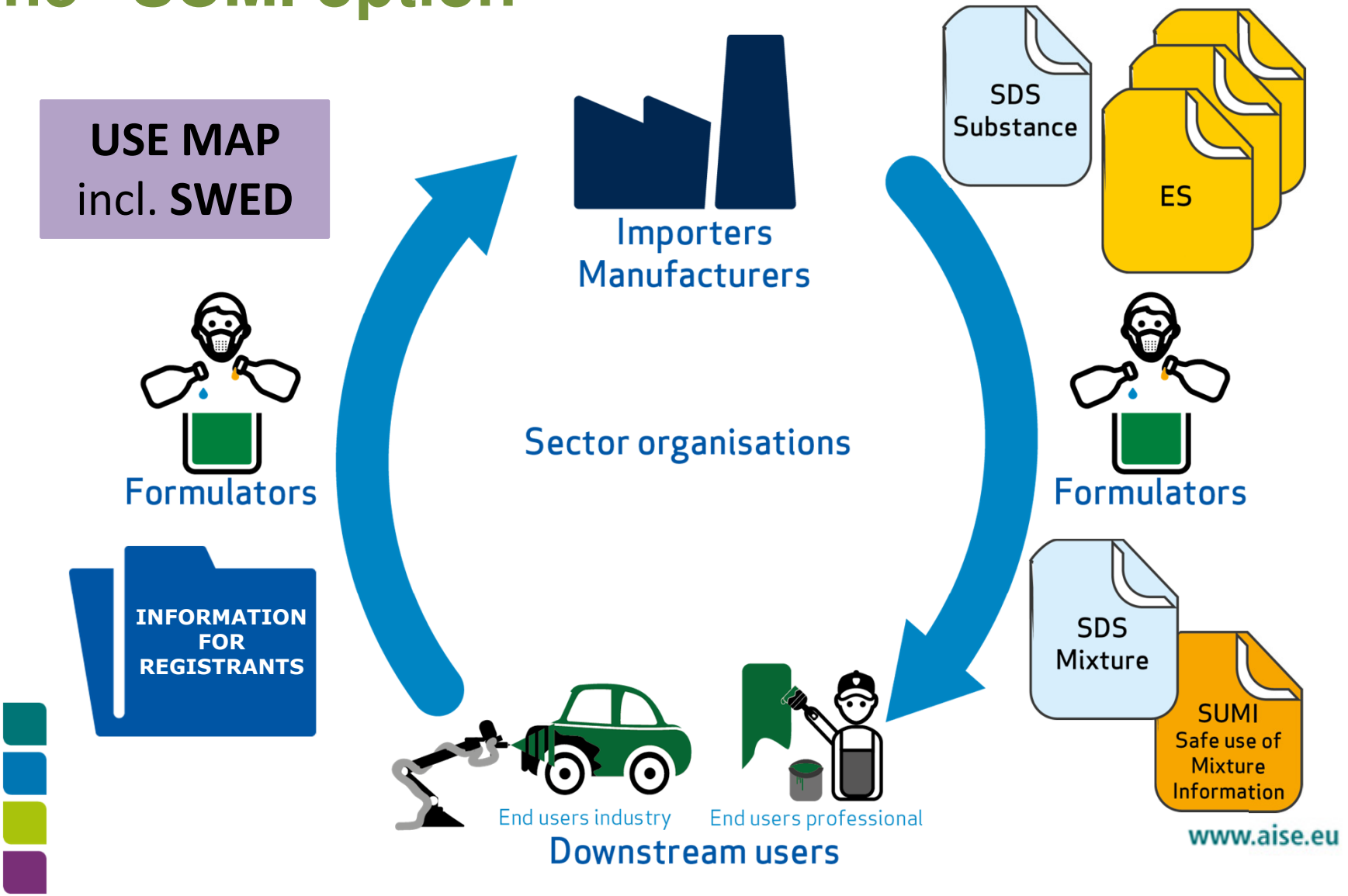
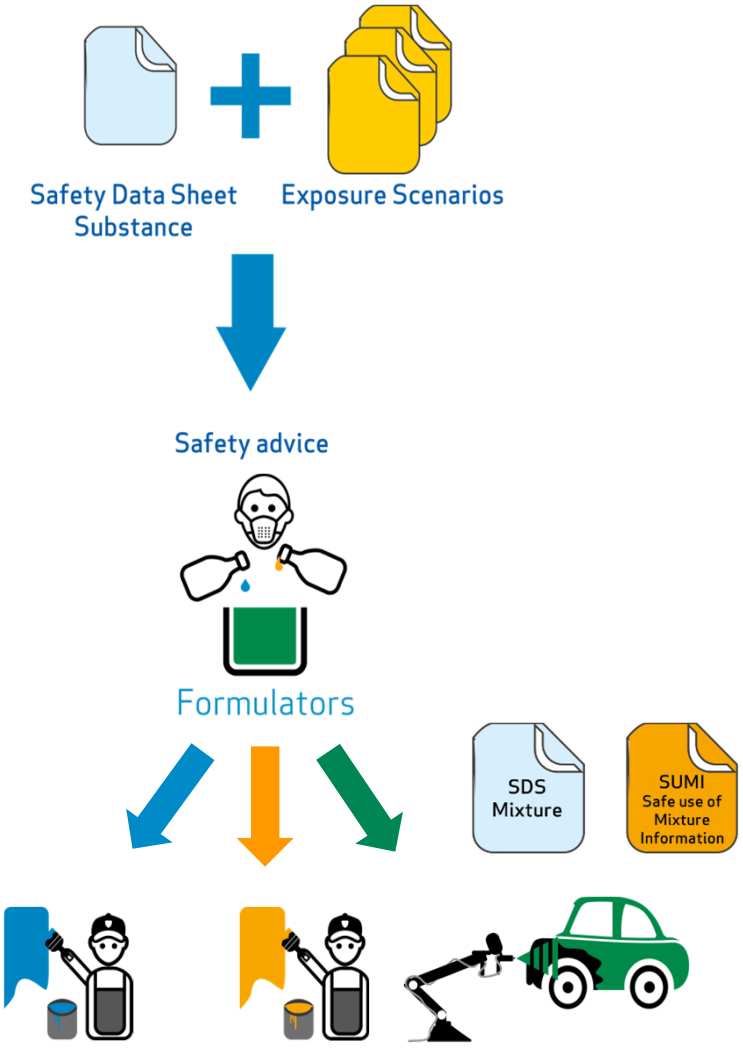
The supply chain: summary with the “SUMI option”



Communication down the Supply Chain - The formulator's role



- Map product use and communicate to suppliers.
- Formulator receives extended safety data sheets for substances from his suppliers
- Identifies and consolidates relevant advice to provide for safe use of the mixture
- Report back to suppliers
- Provides safety data sheets for hazardous mixtures to downstream users, together with consolidated information on safe use (in SDS or as SUMI)
- Customers receive clear, relevant information so they can use the mixtures safely

Map product use to AISE SWED

Professional vs industrial

- Professional =
  - not a production site, wide spread use, less supervision, various degree of training
- Industrial =
  - use a production site, well-trained employees, proper work instructions, and supervision

SWED code	SUMI code	Title	Explanation	Examples
AISE_SWED_PW_8a_1_L	AISE_SUMI_PW_8a_1	Transfer of product to a container (bottle/bucket/machine); Level II	The product is filled from large containers into a bottle, a bucket or a machine, without dedicated equipment and containment techniques in place. It is a short process. Protection of hands is in place.	Transferring a concentrated product to a bucket, flask or machine, whether or not in combination with diluting the product with water.
AISE_SWED_IS_8b_2_L	AISE_SUMI_IS_8b_2	Transfer and dilution of concentrated product by using dedicated dosing system; Level I	The product is filled from large containers into a machine or a vessel. Filling means to link and delink a tube with the container. It is a short process.	
AISE_SWED_IS_8b_2_S				

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Example product

- Composition of sanitary cleaner

Ingredient	Classifed (CLP)?	Conc. (%)	Contributing to mixture classifaction?
Water	No	80,14	No
Phosphoric acid	Yes	9,8	Yes
Sulphamic acid	Yes	4	Yes
ABS	Yes	6,0077	Yes
Perfume X	Yes	0,05	No
Colorant Y	No	0,0035	No

- **Product classification:**
  - *Skin Cat. 1, causes severe skin burns and eye damage (H314)*

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Example product

- Sanitary cleaner for professional use
- ***Typical use: Undiluted brushing by hand for 'tough' stains, diluted brusing by hand for everyday cleaning***

  - Application 1: brushing by hand with undiluted product
    - PROC19, on average about 6 hours a day
    - Select : AISE_SWED_PW_19_2

  - Application 2: diluting the product in a bucket
    - PROC8a, on average max. 1 hour a day
    - Select : AISE_SWED_PW_8a_1

  - Application 3: brushing by hand with the diluted product
    - PROC19, on average 8 hours a day
    - Select : AISE_SWED_PW_19_1

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Example product

- Sanitary cleaner for professional use
  - Product classified for health hazard →
    - *REACH obligation to check ESs of hazard driving substances and to forward safe use information*
  - Three substances contributing to mixture classification
    - Phosphoric acid, Sulphamic acid, ABS

  - Three applications, three SUMIs to be selected
    - PROC19 (brushing) and PROC8a (diluting)

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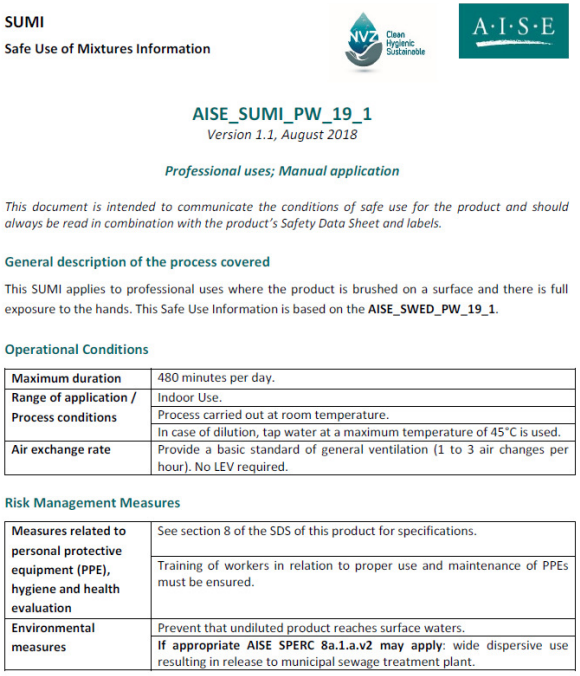
Example product

- Sanitary cleaner for professional use
  - Applications of a dilution: is the dilution still classified?
    - If no: any use of dilution is safe
  - Sanitary cleaner: dilution (1:10, according to label and instructions) is not classified
    - Brushing by hand with diluted product is safe without OC/RMM
    - → for dilution AISE_SUMI_PW_19_1 applies!



SUMI

Safe Use of Mixtures Information

AISE_SUMI_PW_19_1

Version 1.1, August 2018

Professional uses; Manual application

This document is intended to communicate the conditions of safe use for the product and should always be read in combination with the product's Safety Data Sheet and labels.

General description of the process covered

This SUMI applies to professional uses where the product is brushed on a surface and there is full exposure to the hands. This Safe Use Information is based on the **AISE_SWED_PW_19_1**.

Operational Conditions

Maximum duration	480 minutes per day.
Range of application / Process conditions	Indoor Use.
	Process carried out at room temperature.
	In case of dilution, tap water at a maximum temperature of 45°C is used.
Air exchange rate	Provide a basic standard of general ventilation (1 to 3 air changes per hour). No LEV required.

Risk Management Measures

Measures related to personal protective equipment (PPE), hygiene and health evaluation	See section 8 of the SDS of this product for specifications.
	Training of workers in relation to proper use and maintenance of PPEs must be ensured.
Environmental measures	Prevent that undiluted product reaches surface waters.
	If appropriate AISE SPERC 8a.1.a.v2 may apply: wide dispersive use resulting in release to municipal sewage treatment plant.

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ES Phosphoric Acid

No.	Short title	Main User Group (SU)	Sector of Use (SU)	Product Category (PC)	Process Category (PROC)	Environmental Release Category (ERC)	Article Category (AC)	Specification
1	Manufacture of substance	3	8, 9	NA	1, 2, 3, 4, 8b, 9, 15	1	NA	ES1433
2	Industrial use	3	8, 9, 10, 15, 16, 17	0, 1, 7, 9a, 9b, 13, 14, 19, 20, 21, 23, 24, 25, 26, 32, 34, 35, 37, 39	1, 2, 3, 4, 5, 7, 8a, 8b, 9, 10, 13, 14, 15, 19, 22, 23	2, 3, 4, 6a, 6b, 6d	NA	ES1460
3	Professional use	22	1, 19	9a, 9b, 12, 14, 15, 31, 35, 37, 38	5, 8a, 8b, 9, 10, 11, 13, 19, 25	8a, 8b, 8c, 8e	NA	ES1470
4	Use in Cleaning Agents	21	NA	0, 12, 28, 31, 35, 38, 39	NA	8a, 8b, 8e, 10a, 11a	NA	ES1513

1. Short title of Exposure Scenario 3: Professional use	
Main User Groups	SU 22: Professional uses: Public domain (administration, education, entertainment, services, craftsmen)
Sectors of end-use	SU1: Agriculture, forestry, fishery SU19: Building and construction work
Chemical product category	PC9a: Coatings and paints, thinners, paint removers PC9b: Fillers, putties, plasters, modelling clay PC12: Fertilizers PC14: Metal surface treatment products, including galvanic and electroplating products PC15: Non-metal-surface treatment products PC31: Polishes and wax blends PC35: Washing and cleaning products (including solvent based products) PC37: Water treatment chemicals PC38: Welding and soldering products (with flux coatings or flux cores), flux products
Process categories	PROC5: Mixing or blending in batch processes for formulation of preparations and articles (multistage and/or significant contact) PROC8a: Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at non-dedicated facilities PROC8b: Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at dedicated facilities PROC9: Transfer of substance or preparation into small containers (dedicated filling line, including weighing) PROC10: Roller application or brushing PROC11: Non industrial spraying PROC13: Treatment of articles by dipping and pouring PROC19: Hand-mixing with intimate contact and only PPE available

ES Phosphoric Acid

2.2 Contributing scenario controlling worker exposure for: PROC5, PROC8a, PROC8b, PROC9, PROC10, PROC11, PROC13, PROC19, PROC25		
Product characteristics	Concentration of the Substance in Mixture/Article	Covers concentrations more than 25%
	Physical Form (at time of use)	liquid, solid
	Frequency of use	220 days/year
Frequency and duration of use	The maximum duration considered for this exposure scenario is a working shift of above 4h/day (worst case assumption)	
	Frequency of use	8 hours/day
Organisational measures to prevent /limit releases, dispersion and exposure	Because the substance is corrosive, the risk management measures for human health should focus on the prevention of direct contact with the substance	
Conditions and measures related to personal protection, hygiene and health evaluation	Use suitable eye protection and gloves. Wear suitable coveralls to prevent exposure to the skin.	

ES Phosphoric Acid

- SUMI selection
  - ES of **phosphoric acid** covers applications of PROC19 and PROC8a
    - Up to 480 minutes/day, with use of gloves & goggles
    - Same situation with ABS and Sulphamic acid
  - AISE_SUMI_PW_8a_G and AISE_SUMI_PW_19_2_G apply for undiluted product

Example Product

- Communicating safe use information for sanitary cleaner (example)

  - In core section of SDS:
    - For this product the following A.I.S.E. SUMIs are applicable (see appendices):
      - Diluting the product in a bucket with water: AISE_SUMI_PW_8a_G
      - Brushing by hand of the DILUTED product: AISE_SUMI_PW_19_1 (PLEASE NOTE: ONLY WHEN DILUTION FACTOR OF AT LEAST 1:10 IN WATER IS ENSURED)
      - Brushing by hand of the undiluted product: AISE_SUMI_PW_19_2_G

Append relevant SUMIs to product SDS

Example Product– what if ES information is NOT acceptable

For example: required AISE_SWED_PW_19_1, manual use without gloves, but only scenarios with gloves available

1) Request supplier to adjust scenario, referring to AISE SWED!
2) Scaling possible?
3) Do DU-CSR (not preferred, supplier will not be aware that there is an issue, no improvement to be expected in future)
4) Accept to change your safety advise (NOT PREFERRED, not worker friendly)

Other common situation:

- LEV required for professional use.

Communicating with Downstream Users

1. Ensure that the product SDS contains your recommended use and is in line with AISE SWED/SUMI

2. safe use communication for recommended use:
    a) Via main body of the SDS
        a) Send SDS to customer
    b) via SUMIs
        a) Send pro-actively the full SUMI package to your customer with explanation
        b) Refer in the SDS or specific communication to AISE website where full package is available in all languages
        c) If technically possible : automatically send the relevant SUMIs per product in correct language together with the Safety Data Sheet

The AISE SWED code is the most important!
Currently AISE SWED code can directly be entered in WIK Maker resulting in a Worker Instruction Card.

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A.I.S.E. SUMIs

How to use SUMIs as end user?

- Determine how the product should be applied
  - Label, SDS and/or SUMI for the recommended AISE SWED codes

- Check which OC/RMM are required
  - Maximum duration per day?
  - Do I have the right gloves? etc

- Ensure that the employees adhere to the conditions of safe use
  - Training the employees
  - Developing Workplace Instruction Cards, based on SUMI information for product risks (For example: use ‘ WIK Maker’)

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Summary and Closing Remarks

- Determining and communicating conditions of safe use of the mixture is a legal obligation!
  - Even own assessment may be required if supplier has not done so

- Use of the A.I.S.E. SUMI approach is voluntary, but expressly urged
  - Harmonisation and simplicity for end-users

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Summary and Closing Remarks

- Mixture not classified according to CLP? No additional requirements!

- Only send SUMIs if a ‘safety assessment’ has been performed!
  - Based on ESs from substances contributing to classification
  - Based on own assessment
  - Based on CLP classification
    - No classification or acute classification (gloves and goggles are (also) for acute hazards!)

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Use Maps Benefits

- Reliable, realistic conditions of safe use
- Standardized, harmonized communication between suppliers
  - SUMIs, tailored information for end-users
- Using the results of a chemical safety assessment done at manufacturer level
  - Dutch OHS inspectorate: A.I.S.E. SUMIs can be used as a basis for the (OHS) chemical risk assessment (translation to practice required)

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Closing remarks

- Use maps improve upstream communication…
  - More detailed information on actual uses
- …and therefore also downstream communication…
  - High quality, reliable exposure scenarios
- …which enables safer workplaces, especially at end-user level.
  - Using the assessment results from a more knowledgeable player in supply chain

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Next Steps

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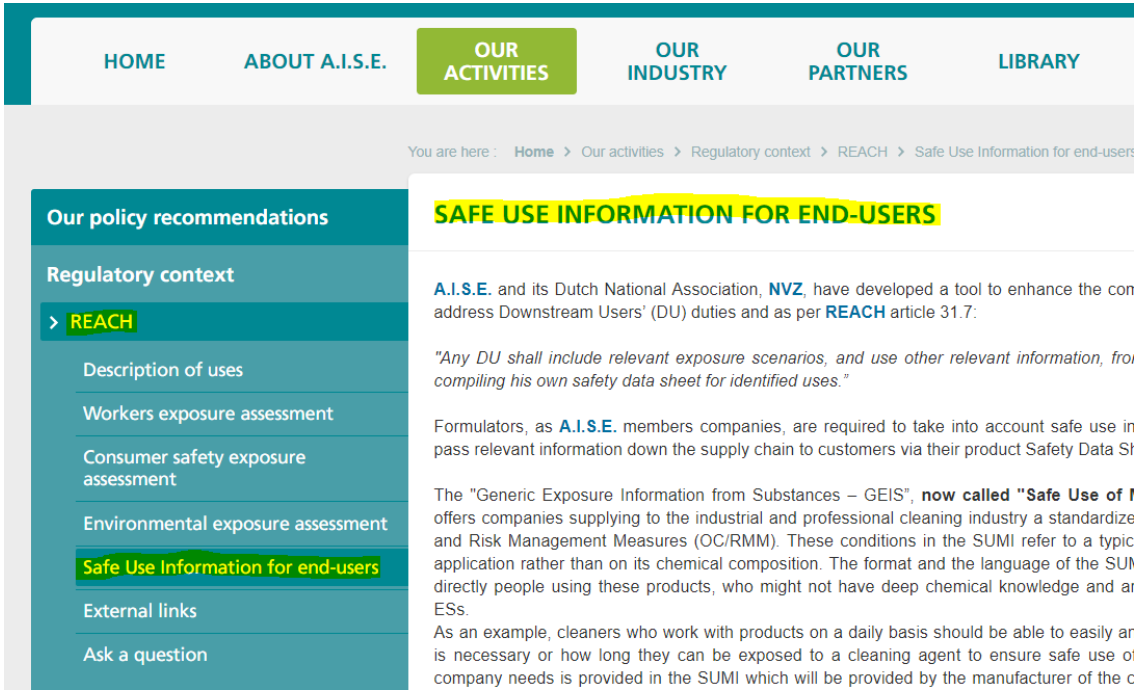
Where to find the SUMIs?

https://www.aise.eu/



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Next Steps

- Translations
  - End 2018: French, German, Italian, Dutch, Portuguese, Spanish and Finnish.
  - A.I.S.E. encourages translations

- Possibility of organizing a second Webinar (cover more practical examples of SUMIs) is being considered.

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Q&A

More in-depth answers to questions will be provided in writing.

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A·I·S·E

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References and Useful links

ENES

https://echa.europa.eu/nl/about-us/exchange-network-on-exposure-scenarios

ECHA R12 Guidance

https://echa.europa.eu/documents/10162/13632/information_requirements_r12_en.pdf

A.I.S.E. Use Maps

https://www.aise.eu/our-activities/regulatory-context/reach/description-of-uses.aspx

ECHA Use Maps

https://echa.europa.eu/csr-es-roadmap/use-maps/concept

ESCom Standard Phrases

http://www.cefic.org/Industry-support/Implementing-reach/escom/

CSR/ES roadmap 2018

https://echa.europa.eu/-/reach-roadmap-published

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