

Use description Guidance (R12) - introduction

ENES7 – breakout groups

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R12 update:

Main changes - Guidance

- Extension of scope: from use descriptors to use description

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R12 update:

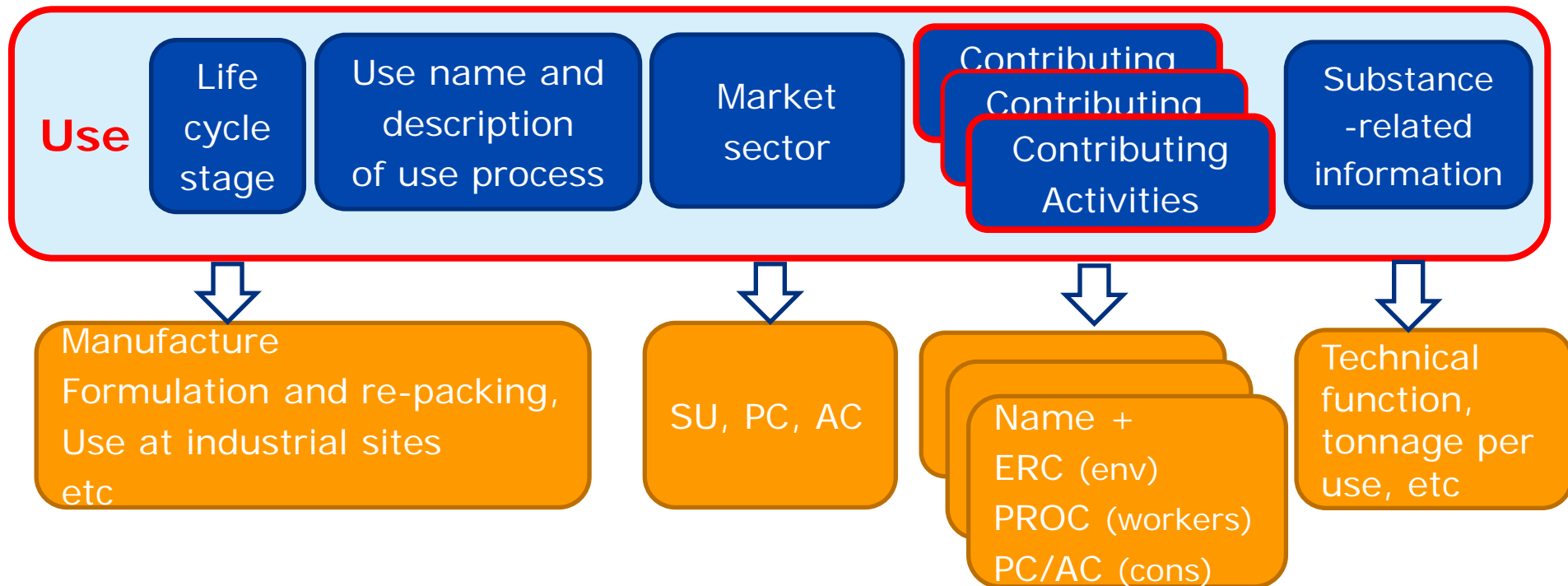
Main changes - Guidance

- Understanding of legal requirements as well as the role of use information in various processes
- Annexes including clarifications:
 - Clarification of terms and concepts
 - Drivers for splitting into uses and contributing activities
 - Differentiation between industrial and professional Life cycle stages
 - Lists of use descriptors

R12 update:

Main changes - Guidance

- Main concepts explained: life cycle, use/contributing activity, etc.



- Concept of use description aligned with tools e.g. IUCLID, use maps

R12 update:

Main changes - use descriptors

- **New UD:** Life cycle stage (replacing 'main SUs')

Use descriptor: Life cycle stage	
LCS1	Manufacture
LCS2	Formulation and re-packing
LCS3	Use at industrial sites
LCS4	Widespread use by professional workers
LCS5	Consumer uses
LCS6	Service life

Clarification of the scope:

- *Formulation includes re-packing within distribution*
- *'Professional use' refers to widespread non-consumer uses taking place outside of industrial sites*

- **SUs:** no major changes
 - SU3,21,22 and 10 removed as redundant with the LCS

R12 update:

Main changes - use descriptors

- **PCs:**

- Shortened names
- New PC for hydraulic fracturing
- Remove PC intermediate (covered by Technical function)

- **PROCs:**

- De-couple activity description from conditions of use
- Clarification of scope of some PROCs
 - making clear when PROCs are sector specific e.g. PROC1-4
 - some PROC names adapted
- Avoiding inconsistencies with ECETOC TRA

R12 update:

Main changes - use descriptors

- Examples:

PROC	Before	After (name)
PROC1	Use in closed process, no likelihood of exposure	Chemical production or refinery in closed continuous process without likelihood of exposure
PROC8a	Transfer of substance or preparation (charging/discharging) from/to vessels/large containers at non-dedicated facilities	Transfer of substance or mixture (charging and discharging) without containment techniques in place

R12 update:

Main changes - use descriptors

Open issue: how to deal with maintenance/cleaning operations?

- Do these activities need a separate CA?
- Do we need to distinguish between frequent (potentially included in existing CAs) and infrequent?
- Are they use-specific? Or substance specific i.e. qualitative assessment based on substance properties = PPE based
- Are they site-specific?

R12 update:

Main changes - use descriptors

– ERCs:

Clarification of ERC names based on their applicability depending on:

- LCS
- Fate
- Indoor/outdoor
- Articles with release-promoting conditions

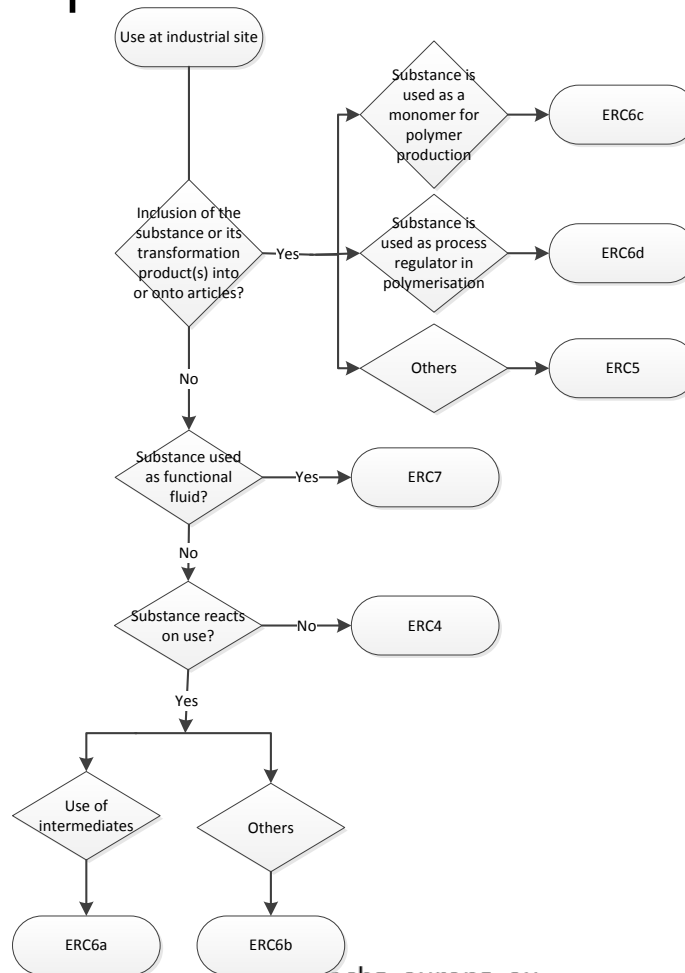
Examples:

ERC6b: Use at industrial site; No inclusion into or onto article; Reaction on use

ERC8f: Widespread use; Inclusion into or onto article; (outdoor)

Main changes - use descriptors

- New flowchart added to support assignment of ERC: (example for industrial sites)



R12 update:

Main changes - use descriptors

- **ACs:**

- Enhancing the concept of AC sub-categories to bring more specific information on articles
- Alignment with US system (proposed to OECD) as much as possible

– **TF:** adaptation of pick-list on the basis of US EPA (proposed to OECD):

- Harmonisation purpose
- Migration relatively straight-forward (only additional TFs)
- No impact in CSA
- Based on large number of dossiers with free text

- Draft updated Guidance circulated to PEG nominees before end of the year
- 4 weeks commenting according to Consultation procedure for Guidance (holidays break will be considered)
- PEG meeting: likely to take place in March '15
- Response to comments will be provided
- Publication foreseen by end of 2015
- Practical Guide and examples to follow. Consultation in parallel!

Thank you!

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