

Uses of Petroleum Substances

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Scenarios (ENES9)**
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- ▶ The EU Commission SVHC Roadmap states that *"there is a need to develop an approach to assess the petroleum streams (approach 2013-2015, systematic assessment from 2016)."*
- ▶ The 2010 REACH registration dossiers for Petroleum Substances contain Tonnages per Use per Category* whilst regulatory processes (e.g. SVHC assessment) take place at the Substance level
- ▶ Therefore, in July 2014 Concaawe sent Questionnaires to all registrants of Petroleum Substances, requesting information on Tonnages per Use per Substance per Legal Entity for the year 2013
 - ▶ The Tonnages are aggregated per Substance before sharing outside Concaawe to protect the confidentiality of the information
 - ▶ 2013 data are considered historical and can be used without infringing Competition Law

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* A Category is a group of substances with similar properties



- ▶ The scope (i.e. number of registrations) of the Use survey is hard to define since:
 - ▶ Concaawe does not have complete information on the UUIDs of the registering Legal Entities (registrants do not always inform Concaawe of changes)
 - ▶ The information in ECHA Dissemination website only gives the Legal Entity names and provides only one entry when the same Legal Entity name has been used for more than one UUID
 - ▶ Ownership changes, Bankrupted companies, Cease of Manufacture, etc. further complicate the picture
- ▶ Combining the information from Concaawe and from the ECHA Dissemination website (as of 18 June 2015), there are **4,468** registrations using (or having used) Concaawe dossiers for **207** Petroleum Substances by **735** Legal Entities; 413 of these registrations are inactivated (Cease of Manufacture, Ownership changes, ...) - 8 substances and 54 Legal Entities have no active registrations

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Degree of Coverage

- ▶ **4,055** sets of data (Legal Entity + Substance) for **199** Petroleum Substances were expected from **681** Legal Entities
- ▶ As of 1 August 2015, **3,570** sets of data for **199** Petroleum Substances have been received from **489** identified Legal Entities
- ▶ In terms of registrations, the data received by Concaawe reach **100 %** for Concaawe members and **63.7 %** for non-members with an overall Degree of Coverage **88.0 %**; all missing Legal Entities are non-members and Concaawe often does not have a working e-mail contact for them
- ▶ **Concaawe is seeking ways to clearly indicate in the Chemical Safety Reports to which Legal Entities the assessment applies; Concaawe cannot take any responsibility for the assessment of Tonnages that have not been communicated by registrants**



- ▶ Tonnage per Use is not relevant in the following situations
 - ▶ When the substance was registered by the Legal Entity only as Intermediate under Strictly Controlled Conditions, since no Risk Assessment is required
 - ▶ When the Legal Entity reported no movement of the substance in 2013
- ▶ After considering the above, the Concaawe Tonnages Database comprises **6,987** tonnage values from **1,878** sets of data for **176** substances from **374** Legal Entities

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- ▶ The Concaawe Tonnages Database also contains information on the hazard classification of the Substances since several “versions” of the same Use may exist according to the different possible classifications (e.g. due to the application of the Notes included in CLP Annex VI)
- ▶ As shown in the example below, the Tonnages allocated to each Use are therefore linked to a specific hazard classification *

Use No.	Use Name	Tonnes
67	06 a – Lubricants: Industrial (not classified; IP 346 < 3%; > 20.5 cSt @ 40°C)	6,924,197
68	06 a – Lubricants: Industrial (classified as H304 only; IP 346 < 3%; ≤ 20.5 cSt @ 40°C)	560,134
69	06 a – Lubricants: Industrial (classified as H350, not H304; IP 346 ≥ 3%; > 20.5 cSt @ 40°C)	0
70	06 a – Lubricants: Industrial (classified as H350 and H304; IP 346 ≥ 3%; ≤ 20.5 cSt @ 40°C)	0

- ▶ Besides Tonnage, hazard classification is a key criterion to prioritize Substances for regulatory processes

* Note L in Annex VI to CLP drives the classification as Carcinogen based on IP 346 (DMSO extract); Viscosity drives the classification for Aspiration



- ▶ Since February 2015, Concaawe has been updating ECHA (and then COM and MSCAs) on the status of the Uses survey
- ▶ The exchange of data has taken place informally: data were provided as Excel files and PowerPoint summaries rather than via dossier updates
- ▶ This “informal” approach has proven to be very efficient in terms of data sharing since updating dossiers is a very time-consuming exercise that also require participation from (Lead) registrants
- ▶ Concaawe thanks ECHA for its understanding of the difficulties of the task, which resulted in significant delays to provide final, consolidated data
- ▶ Dossier updates to cover the new data on Tonnages per Use per Substance will be undertaken by Concaawe in connection with the upgrade to IUCLID6



- ▶ The initial set of data (February 2015) showed that 150 million tonnes were reported as “sold to traders / distributors” and therefore were not allocated to a specific Use
 - ▶ The “worst-case” approach implies that all non-allocated Tonnage is assumed to go into Consumer uses
 - ▶ Therefore **127** Petroleum Substances would be considered as relevant for prioritization due to widespread (or unknown) Uses
- ▶ After a very time-consuming (but worthwhile) interaction with registrants, all non-allocated tonnages were assigned to specific Uses in the final set of data (August 2015)
 - ▶ Only **65** Petroleum Substances have widespread uses

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Use setting	Million tonnes
Manufactured	821
Imported	199
Exported	51
Intermediate Use (not under Strictly Controlled Conditions)	324
Marketed = Manufactured + Imported – Exported – Intermediate Use	645
Fuel	609
Industrial (non-Fuel)	16
Professional (non-Fuel)	20
Consumer + Articles (non-Fuel)	2
Widespread (non-Fuel) = Professional + Consumer + Articles	22

- ▶ Although only $22/(821+199-51) = 2.3 \%$ of the EU Tonnage goes into Widespread uses, the absolute figure (**22 million tonnes**) is significant

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STATUS			# Subs
Ceased Manufacture in REACH-IT			8
Only Intermediate under SCC			11
No movement in 2013			12
Marketed = 0			31
Marketed > 0	Widespread = 0		80
	Widespread > 0	Consumer + Articles = 0	20
		Consumer + Articles > 0	45
TOTAL			207

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Some figures

- ▶ Information received for 88 % of active registrations (100 % Concaawe members)
- ▶ Tonnages reported for 380 out of 512 Uses; 123 Uses reported in less than 3 registrations
- ▶ 357 registrations report widespread uses (non-fuel professional / consumer / articles) for 65 substances; 38 substances with widespread uses reported in less than 3 registrations

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A legal review will be completed, to ensure the proposed steps below are done in compliance with Competition Law

- ▶ Quality checks will be conducted to confirm uses reported in less than 3 registrations
- ▶ After consultation with SIEFs, uses with no reported tonnages will be removed from the dossiers
- ▶ After consultation with SIEFs, several uses may be included in the dossiers as “Uses advised against”

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CONCLUSIONS

- ▶ This exercise has taken 1 man-year of effort at Concaawe, plus significant resources from registrants
- ▶ The collection of Uses data for Petroleum Substances has been beneficial for the following reasons
 - ▶ The Use pattern has been clarified vs. the all-inclusive approach taken in 2010, resulting in a significantly smaller number of Uses (for classified Substances) to be assessed (from 323 down to 220)
 - ▶ The allocation of Tonnages (and related hazard classifications) to Uses is key to guide the prioritization for the SVHC Roadmap, resulting in a significant reduction of the number of Substances in scope (from 207 down to 65)

Concaawe wishes to thank registrants for their collaboration

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