



REACH – Automotive Industry Recommendation on Exposure Scenarios

Introduction

With the REACH regulation (EC) No. 1907/2006 a number of new requirements are introduced in respect to the use of chemical substances. In the chemical safety assessment (CSA), which is part of the chemical safety report (CSR), the Manufacturer/Importer (or 'only representative' fulfilling the obligations of the importer) has to demonstrate the safe use of a substance for all identified uses through the substance's whole life cycle. The life cycle covers manufacturing, formulation, service life, end use and waste stage of the substance. This is achieved by applying the appropriate operation conditions (OC) and risk management measures (RMM) to the Exposure Scenario (ES).

Due to the complexity and size of the supply chain and the huge number of substances to be registered, the automotive industry is confronted with a major challenge in terms of implementing these requirements. It is essential that a common approach is adopted in the whole automotive supply chain in regard to exchange of information on uses by Manufacturer/Importers (M/I) and Downstream Users (DU) when building an exposure scenario.

If supported by the M/I the use of a substance should become an identified use within an ES.

When is an Exposure Scenario (ES) required?

If a substance that is to be registered is classified as dangerous, vPvB or PBT and is manufactured or imported equal to or above 10 tonne per annum, an exposure scenario assessment and risk characterisation is obligatory.

Automotive Industry's Position

Car manufacturers and tier one suppliers in general will not respond to company specific questionnaires in regard to exposure scenarios, but require a pre-populated spreadsheet (preferable the DUCC UseR template and/or CEFIC template)¹ which need only to be checked for completeness i.e. that your identified uses are covered.

Suppliers of substances or preparations are urged to contact their appropriate association for the substance in question, to make sure that their use becomes an identified use in the generic exposure scenario.

¹ <http://www.cefic.be/Templates/shwPublications.asp?HID=750>

In the case of large tonnage band registrations, it is necessary to make sure that your use is upstream communicated before the 30th of November 2009 because after that date the manufacturers / importers who are responsible for registration including exposure scenarios are not obliged to make your use an identified use.

How an automotive supplier being a Manufacturer / Importer (or Only Representative) of substances / preparations has to approach the Automotive sector?

- The Automotive Industry (AI) is following the CEFIC recommendation and
 - will not proactively approach their chemical suppliers but wait until associations start communication.
 - will not accept individual exposure scenarios from each supplier.
 - will only accept Generic Exposure Scenarios sent or published via the individual association of the supplier (preferably in the DUCC template).
- Please ask your association to
 - forward the Generic Exposure Scenario for the affected substance / preparation to techsec@clepa.be
 - or send information to techsec@clepa.be indicating where the ES has been published (e.g. on the webpage of the association)
- As an exceptional case the Automotive Industry will also accept Exposure Scenarios send by an individual supplier (and not an association) if the supplier is no member of any association.

In case an association considers they are responsible for building an ES for a specific substance or preparation (SES), the AI strongly recommends to evaluate and use a generic ES which should then be provided for review by the AI in a timely manner. In case the automotive industry experiences problems to cover all uses via the provided generic exposure scenario we expect support to modify the ES via scaling tools by the associations.

Recommendations for the Automotive sector

- Even if the official deadline is the 30 November 09 for the high tonnage band substances which are classified as dangerous, PBT or vPvB, it is recommended to start communication as soon as possible by distributing e.g. this letter
- To minimise effort, we urgently suggest not to start discussions with individual suppliers or customers but give feedback on your expectation to the relevant association responsible for exposure scenario building.
- Should any car manufacturer or supplier receive a request from an association in respect to exposure scenario building, they are requested to forward the document to CLEPA at techsec@clepa.be and they will disseminate the information within the industry.
- An industry wide sub-working group –of the international Automotive Industry Associations- will analyse all received ESs and update the TF-REACH.