

Simplified Guidance to Identified Use Communication in the Supply Chain

Under the REACH legislation, each chemical substance manufacturer or importer is required to register their substances at the appropriate date (Dec 2010, June 2013 or June 2018). If the substance is hazardous (based on test data) the registration dossier must include a risk assessment to man and the environment. This risk assessment needs to consider Identified Uses of the substance, and its disposal as waste

Part of the risk assessment process includes the creation of an Exposure Scenario (ES) for each Identified Use covering its various life cycle phases including disposal. The ES describes how man and the environment might be exposed to the substance and how that exposure can be controlled by applying appropriate Operational Conditions (OCs) and Risk Management Measures (RMMs). OCs describe how the substance is to be used and RMMs describe the precautions needed to handle the substance safely. Ultimately a summary of the ES will form part of the Extended Safety Data Sheet (eSDS) that is provided to the user.

REACH permits Downstream Users (DUs) to inform their suppliers of their substance/product use so that it can be included in the Registration dossier. These are known as Identified Uses under REACH. By supporting these uses, the supplier is then obliged to provide an appropriate ES for any hazardous substances. If however a DU does not wish to inform the supplier of his use, he must prepare his own ES to retain on file and inform the European Chemical Agency (ECHA).

Under the guidance documents published by ECHA, the use of any chemical substance can be described using a series of codes known as the Use Descriptor System. Each product type can have several Use Descriptors representing different phases of its life cycle. **This is a common framework that permits harmonisation of use communication in all supply chains, including the lubricants supply chain.** The codes are divided into a number of categories:

- SU** Sector of Use: Describes the main area of use (manufacturing, private use, etc) and type of industry (eg large scale chemical industry)
- PC** Product Category: Describes the type of product (eg hydraulic fluid, metalworking fluid, etc)
- PROC** Process Category: Describes how a substance is being used (eg spraying, brush application, etc)
- ERC** Environmental Release Category: Describes the environmental exposure conditions related to the PC and PROC codes
- AC** Article Category: Describes the type of article into which the substance has eventually been processed. This is unlikely to be applicable to formulated lubricants.

Two sector groups representing the lubricants industry (ATIEL¹ and ATC²) have identified several hundred different lubricant applications and allocated each of these to one generic Lubricant Use Group on the basis of how the products are generally used (i.e. their exposure profile).

Use Descriptors were then allocated to these generic Lubricant Use Groups such that each of the different lubricant applications can be described by a limited number of Use Descriptors, enabling simple and consistent use communication in the supply chain.

Generic Exposure Scenario (GES) will be developed covering these Lubricant Use Groups thereby avoiding the need for industry to develop a separate ES for each of the different types of lubricant use identified.

¹ATIEL = Association Technique de L'Industrie Européenne des Lubrifiants

²ATC = Technical Committee of Petroleum Additive Manufacturers in Europe

ATIEL/ATC has produced guidance describing how suppliers and customers in the lubricants supply chain can use this harmonised information to ensure that their specific uses have been covered appropriately.

Specifically Section 7 on the ATIEL website guidance describes how the DUs should use the information to check that their specific uses have been covered appropriately. To do this, the following steps are recommended:

Step 1:

Imagine that your company is an industrial user of a soluble metalworking fluid concentrate. Using the “Lubricant Application Table” (7.2 on the ATIEL website), look for the combination of ‘Family’ and ‘Specific Application’ that best describes the products that you use, and note the generic **Lubricant Use Group (B to F)** to which it/they has/have been assigned. For example:

Family: Metalworking Fluid
Specific Application: Machining/Grinding Fluids—soluble (concentrate)
Lubricant Use Group: E

This means that a soluble metalworking fluid concentrate is in the ATIEL/ATC Lubricant Use Group E.

Note that for metalworking fluids there will be different Lubricant Use Groups for the concentrate and for the diluted in-use fluid. In this case it is necessary to identify both Lubricant Use Groups relevant for the use of the product.

Step 2:

Having identified the Lubricant Use Group(s) from Step 1, open the spreadsheet titled “Lubricant DUC table” (7.3 on the ATIEL website).

In column A of this table, the Lubricant Use Groups are listed and separated according to industrial (i), professional (p) and consumer (c) with each sub-category having a separate set of Use Descriptors. Generally speaking ‘industrial’ is the relevant choice to cover manufacture and most uses of lubricants. The others, p and c, are intended for small workshops or home use respectively. Note that not all Lubricant Use Groups will have professional and/or consumer sub-categories because they are not used in these sectors.

As your company is industrial in this example, find ‘ATIEL-ATC Group E(i)’ in column A. The combination of SU, PC, PROCs and ERCs in this row of the table represent the harmonised Use Descriptors as assigned by the ATIEL/ATC experts to “Metalworking fluid, machining/grinding fluids – soluble (concentrate)” according to industry consensus of how such metalworking products are used. These should match the processes or activities described in column C, and should agree with how you (and, if appropriate, your customers) use this type of lubricant. Detailed descriptions of the PROC and ERC shorthand codes are found on other tabs in this spreadsheet for reference.

Step 3:

If you are happy that your product uses are correctly covered by the Use Descriptors assigned by the lubricants industry (and it is expected that almost all uses will be accurately covered), then there is no need to take further action because these Identified Uses should be covered at Registration. If however, you believe that your use is not accurately covered (for example you are using a lubricant for a different purpose than described on the Lubricant Application Table), then it is recommended that you contact your supplier directly.

Please note that the Use Descriptors that have been assigned to each Lubricant Use Group represent the working group’s current understanding of the ‘normal’ uses of lubricants, i.e. describing tasks that would normally be expected in a workplace or consumer environment. However, the content of the ATIEL/ATC website will be kept under review and may be updated if additional information becomes available and as understanding of the use descriptor system increases.

Summary

Overall, this is a complex process and it requires a detailed knowledge of REACH and its terminologies. The ATIEL and ATC work has been conducted to simplify this process for our customers and ensure an agreed methodology and interpretation across the industry. If you are interested in understanding more on the issues addressed in this work we recommend the guidance documents on the ECHA website .

Such an understanding is necessary for you to ensure your obligations under the legislation. REACH impacts everyone in the chemical supply chain, from the initial manufacturer/importer, through to the final end user. The ECHA website (http://guidance.echa.europa.eu/index_en.htm) contains a range of guidance documents, some of which are simplified versions, and others cover aspects in more depth. We advise you to look at these guidance documents in order to gain a full understanding of the legislation concerning Identified Uses and its impacts on the supply chain.