How Much should Products Details be Gathered and Disclosed for Chemical Safety Management?

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Strategic Approach to International Chemicals Management (SAICM)

Knowledge and information on chemicals and chemicals management are sufficient to enable chemicals to be adequately assessed and managed safely throughout their life cycles
**Chemical Information** has to be gathered from the first tier (manufacturer) and communicated throughout the life cycle.

**REACH**

Registration / Evaluation / Authorisation / Notification / Restriction / Communication

- Industries must have clear understanding of
  - Definitions
  - Roles
  - Obligations

- Manufacturer
  - Technical dossier
  - CSA / CSR
  - (e-)SDS
  - Identified uses

- Downstream User

- Consumer

- must have sufficient and suitable knowledge
**Definition (art. 3(3) REACH)**

**Article**: means an object which during production is given a special shape, surface or design that determines its function to a greater degree than does its chemical composition
**REACH: Information Requirements on Chemicals in Articles**

- EU or EEA *suppliers of articles* which contain substances on the Candidate List > [0.1%] w/w have to provide sufficient information, available to them, to their *customers*, or

- Upon request, to a *consumer* within 45 days of the receipt of request

This information must ensure safe use of the article. At minimum, it must have the substance name.

Source: ECHA, Short summary obligations linked to the Candidate List of SVHC, 4 Nov. 2008

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**Definition** (art. 3(33) REACH)

*Supplier of Article*: means *any producer* or *importer* of an article, *distributor* or *other actor* in the supply chain placing an article on the market
These actors have to provide

“Sufficient information” available to them

- How much information is available in “articles” or “products”?

Examples of Product Information Gathering Initiatives
**Sweden: Product Register**

- Chemical products defined by statistical customs number
- Exclude pharmaceuticals, food, cosmetics and pesticides
- Started in 1978
- To supervise, control, national overview, central information source

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**USA: Household Product Database**

- National Library of Medicine – USA
- Information from various sources
- Communicate mainly to *consumers*
- Started in 2001
Thailand: Platform on Chemicals Safety

- MSDS in Thai
- Lists and Types of Chemicals
  - Thai Laws
  - International Conventions and Directives
- Database of Chemicals with international codes
  - www.chemtrack.org
  - (started in 2003)
- Hazardous Chemicals Registrations of FDA and DOA
- Etc.

Japan: (JAMP) – A Consortium of “Joint Article Management Promotion”

- An industrial independent group in cooperation with Ministry of Economic, Trade and Industry, and Japan Trade Organisation
- Facilitate smooth and appropriate information Transfer about chemical substance contained in the products in the supply chain
- Started in September 2006
Information Offered (Products / Articles)

<table>
<thead>
<tr>
<th>Source</th>
<th>Product name</th>
<th>Registration No.</th>
<th>HS code</th>
<th>Others</th>
<th>Users</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sweden</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>Hazardous component, other substances &gt; 5%, etc.</td>
<td>Authority</td>
</tr>
<tr>
<td>HPD</td>
<td>+</td>
<td>-</td>
<td>-</td>
<td>Ingredients</td>
<td>Public</td>
</tr>
<tr>
<td>ChemTrack</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>Registered Information</td>
<td>Mix</td>
</tr>
<tr>
<td>JAMP</td>
<td>+</td>
<td>-</td>
<td>-</td>
<td>Composition</td>
<td>Industry, Supply chain</td>
</tr>
</tbody>
</table>

How Much Information is Provided and Used?

- Manufacturers
- Customers in supply chain
- Consumers
- Public

Providers (must provide sufficient information)

Users (must have sufficient knowledge to make use of available information)
Product Details – A Good Balance?

Information gathered and disclosed vs Chemical safety and confidentiality

Designing of Information System for Articles

- Concepts, processes and outcomes of existing initiatives should be studied and evaluated
- Key Questions
  - Who are the target audiences?
  - What chemicals?
  - What articles?
  - What information and language?
  - What format?
Designing of Information System for Articles

**Points of concern**

- Technical
- Management
- Co-operation

Simple / Feasible / Practical / …

**Points of Concern - Technical**

- Data structure
- Quality of information
  - Accuracy
  - Updating
- References

Languages
Points of Concern - Management

- Stakeholders participation
  - Institutions
  - National
  - Regional
  - Global
- Funding
- Maintaining

Points of Concern – Cooperation

- Exchange of experience
- Capacity building
Cooperative efforts to exchange experiences at local, regional and global levels is the key mechanism for development of a harmonized information system.

Thank you

Have a good day

Sawasdee ka