

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

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Chemical Information has to be gathered
from the first tier (manufacturer)
and communicated throughout the life cycle

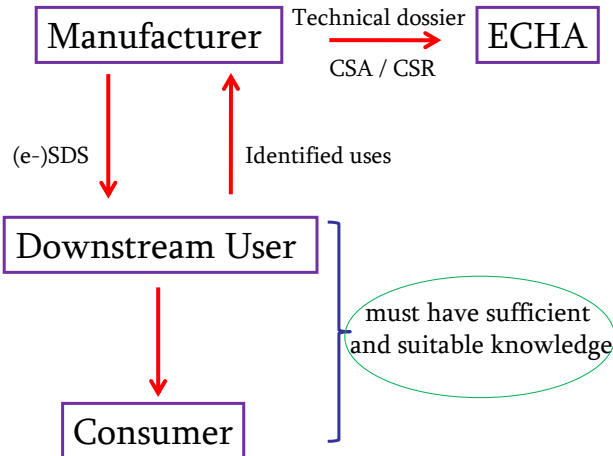


REACH

Registration / Evaluation / Authorisation / Notification / Restriction / Communication

Industries must have
clear understanding of

- Definitions
- Roles
- Obligations



REACH Merits, Processes and Implementations

Knowledge Transfer

Industries / Authorities / Public

Substances

Preparations

Articles



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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



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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



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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

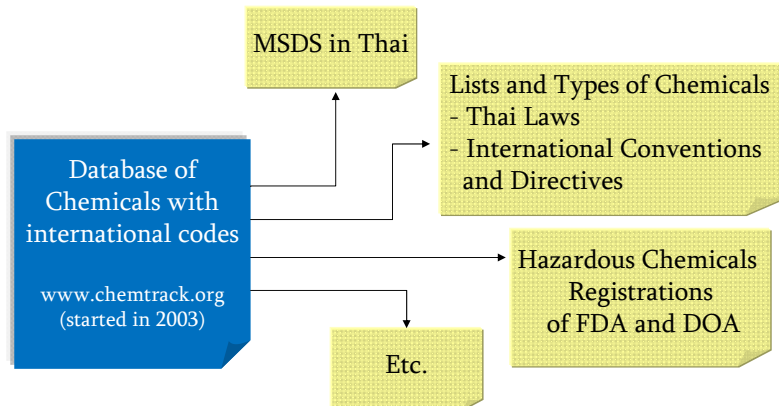


USA: Household Product Database

- National Library of Medicine – USA
- Information from various sources
- Communicate mainly to *consumers*
- Started in 2001



Thailand: Platform on Chemicals Safety



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)

Source	Product name	Registration No.	HS code	Others	Users
Sweden	+	+	+	Hazardous component, other substances > 5%, etc.	Authority
HPD	+	-	-	Ingredients	Public
ChemTrack	+	+	+	Registered Information	Mix
JAMP	+	-	-	Composition	Industry, Supply chain



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



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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 ?



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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

