



Downstream Users of Chemicals Co-ordination group

18 July 2017

## How to use SUMIs: operational framework

Safe Use of Mixtures Information (SUMI) is a communication template, developed by the Downstream Users of Chemicals Co-ordination Group (DUCC) to facilitate the information-flow downstream to the end-users. SUMIs were created in the context of the [Chemical safety report/Exposure scenario roadmap](#), which aims to improve the supply chain communication by developing a methodology to derive and communicate information on the safe use of mixtures (see actions 4.4. and 5.1 respectively).

The 'bottom-up' approach originated by DUCC has as a starting point the *information on the uses of the mixtures* and includes two elements to assist formulators with communication: upstream communication of use conditions in the form of the Sector-specific Worker Exposure Descriptions (SWEDs) included in use mapping tables, and SUMIs for downstream communication - both within the existing boundaries of REACH. SUMIs are therefore an integral part of this so-called bottom-up approach. Hence their applicability domain and boundaries have to be borne in mind when applying them.

Recent discussions within the CSR/ES roadmap activities indicated the wide acceptance of the concept of SUMI, as well as the steps taken so far for their implementation – e.g. in IT systems. These raised some questions as to how and when to use the SUMIs, in particular if applied 'outside' the above-mentioned bottom-up approach. The present document tries to provide the necessary clarity on how to use SUMIs.

- SUMIs are a means to communicate information on the safe use of mixtures **to end-users** – i.e. *professional and industrial workers*. SUMIs are not meant for upstream communication.
- SUMIs are not intended for safe use communication of mixtures in the middle of the supply chain, where the mixture is used in the formulation of another mixture. The applicable exposure scenarios of the relevant substances in the mixture, preferably based on SWEDs, might be a better option in this case.
- SUMIs *assist* in implementing the Occupational Safety and Health (OSH) requirements as they provide the “**product's safe use** information” in a simplified and tailored manner, to better understand and adopt any necessary measures. Therefore, information from the SUMIs can be used by employers to develop the workplace instructions, as it complements the OSH requirements and also the information provided in the product's label and Safety Data Sheet (SDS). However, the employer remains responsible for communicating any other relevant safety information to the employees.
- SUMIs **do not replace the SDS**, but can be appended to or integrated within the SDS of the mixture (i.e. while SUMIs are *use-oriented*, product-specific information is included in the SDS – classification, specifications of PPEs, etc.).
- SUMIs **reflect the result of the REACH risk assessment**; they *are not an independent nor an isolated element* of the supply-chain communication, but the last step for communicating the assessments' output in order to use the product safely. Therefore, to comply with REACH, the operational conditions and risk management measures provided in the **SUMI must not be altered**.
- SUMIs are **directly correlated to the Sector-specific Worker Exposure Description (SWEDs)**, which provide the information on use conditions for upstream communication. Therefore,



Downstream Users of Chemicals Co-ordination group

- Since both elements (SWED, SUMI) are interlinked, formulators can send the appropriate SUMIs to their customers provided that the conditions described in the correlated SWEDs are met - e.g. maximum allowed concentration, etc.
- The SUMI format can be used as a communication element to end-users in other approaches outside the use map context only if the link with the REACH assessment is not lost (i.e. conditions remain the same) because the SUMI closes this 'information circle'. In this regard, a formulator may carry out his own risk assessment for a *specific use* (not covered in the sectorial use map and SWEDs), for instance by using the top-down approach or a DU-CSR, and then use the SUMI format to communicate the results of his own assessment to the end-user. That way the information on both the product use and the result of its assessment is ensured.

#### **About DUCC**

DUCC is a joint platform of **11 European associations** whose member companies use chemicals to **formulate mixtures** (as finished or intermediary products) for professional and industrial users, as well as for consumers.

DUCC focuses on the downstream users' needs, rights, duties and specificities under REACH and CLP. DUCC's membership represents several important industry sectors, ranging from cosmetics and detergents to aerosols, paints, inks, toners, pressroom chemicals, adhesives and sealants, construction chemicals, fragrances, lubricants and chemical distributors industries. Altogether, their membership comprises more than **9.000 companies** across the respective sectors in Europe, the vast majority being SMEs. The calculated turnover of these companies is more than **215 billion euros** in Europe.

**For more information on DUCC:** [www.ducc.eu](http://www.ducc.eu)

Jan Robinson – DUCC Chair, [robinson@cepe.org](mailto:robinson@cepe.org)

Roberto Scazzola – DUCC Vice-Chair, [roberto.scazzola@aise.eu](mailto:roberto.scazzola@aise.eu)

Laura Portugal – REACH Issue Manager, [laura.portugal@aise.eu](mailto:laura.portugal@aise.eu)