



Downstream Users of Chemicals Co-ordination group

## **DUCC Statement on “scaling”**

**December 2012**

Receipt of an extended SDS with a registration number is the starting point for DU obligations with respect to determination of safe use of a substance.

Checking information contained in the Exposure Scenarios provided within this extended SDS enables DUs to identify whether their use(s) is (are) covered and, if so, to which extent.

In case current or future use(s) is (are) only partially covered as described, the DU would have to resort to defining, with available data, whether his use is safe through “scaling” or performing his own CSR.

“Scaling” has been extensively debated already and will be further addressed in ECHA guidance in the future.

Scaling may require extensive expertise and complex tools or may be much more straightforward, making use of simple mathematics. This latter type is of utmost importance for SMEs.

In either case, DUs are already receiving extended SDSs and, therefore, they do have an urgent need for clarification of the acceptable framework for scaling.

**In line with earlier discussions held at the ENES 2<sup>1</sup> meeting, DUCC strongly calls on suppliers to incorporate the following information related to scaling in Section 4 (‘Guidance to DU’) of their Exposure Scenarios:**

- **The method and exposure assessment tool(s) used to prepare the Exposure Scenario;**
- **The “scalable” parameters;**
- **An indication of the scaling tools which can be used, or algorithms;**
- **The upper boundary for the Risk Characterisation Ratio (RCR) that is considered acceptable after scaling.**

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<sup>1</sup> <http://echa.europa.eu/en/about-us/exchange-network-on-exposure-scenarios>