# INVENTORY MULTI-TIERED ASSESSMENT AND PRIORITISATION FRAMEWORK

## Workshop Report – NICNAS Exposure Data Workshop (Tuesday 27 October 2009)

The Exposure Data workshop was held in Sydney on 27 October 2009. The workshop was structured around a Discussion Paper and was intended to explore the types of data industry could provide if requested and the ease with which it could be provided, and to seek ideas and suggestions from data managers to facilitate the data collection process. An understanding of the data industry is capable of providing to NICNAS is critical to developing a framework for data collection within the Prioritisation Project. Information arising from the workshop is to be used to develop a framework for collecting the data needed for prioritisation.

Twenty-two industry representatives and eight representatives from NICNAS and DEWHA attended the workshop held in Sydney. The attendee list is attached (Attachment 1). As well as individual companies, two major industry associations (ACCORD and PACIA) were represented. The companies represented ranged from small to large, with good representation of medium and large companies. The sectors covered ranged across a broad spectrum, with both supply of formulated products (including consumer products such as cosmetics) and industrial use of chemicals well represented.

The Workshop was divided into two parts, with formal presentations in the morning, followed by two workshop sessions in the afternoon. The presentations provided the participants with background information on the Prioritisation Project. This included:

- An overview of the project;
- Information on the types of chemicals on AICS and the availability of toxicological data
- Industry perspective; and
- International perspective.

The afternoon consisted of two workshop sessions. The first workshop session addressed the questions that were raised in the workshop discussion paper concerning the following topics:

- Availability of exposure information;
- Options for data collection;
- The value of including a threshold quantity; and
- The preferred reporting period.

The second workshop session focused on several issues arising from the first workshop session in more detail.

Prior to the afternoon workshop sessions, attendees were given the opportunity to identify the types of information that they would like to receive from the workshop. The responses are included verbatim at Attachment 2.

**Availability of Exposure Information**.
NICNAS was interested in ascertaining whether the industry inventory management systems were capable of supplying the following information:

- What chemicals are in commerce in Australia?
- How much of each chemical is in use in Australia?
- What is the use of the chemical?

The workshop participants advised that most companies use electronic inventory management systems, commonly SAP. Company inventory systems had various capabilities of tracking imported and/or manufactured chemicals. The capabilities depended on the types of inventory system used, whether a company introduced discrete chemicals or mixtures, and issues surrounding chemical identity confidentiality or company policy.

**Identity and volume of chemicals manufactured and/or imported by the company in Australia**
In some cases a company's inventory management system and chemical management system are kept separate. The inventory management system is designed purely to track sales of products by product identification number ("Stock-keeping unit", SKU) and does not include information on the chemicals comprising the products. The chemical management system is used for regulatory purposes and is generally not as well developed as the product management system. This is the system which includes the identities of the imported or manufactured chemicals.

To track introduction volume of a specific chemical would require linking the information across the two databases which could be a time-consuming manual process. However, for some companies, providing the identity of all chemicals in use by the company may be practicable, as long as the introduction volume is not also required.

Some companies are not aware of the identity of ingredient chemicals in products, and pre-introduction checks of the AICS status of the chemicals is undertaken by the overseas supplier. In these cases, information would have to be obtained from the overseas supplier. A third party confidential submission process similar to that used for new chemical notifications and annual reporting would be required.

**Use**
In some cases, particularly for manufacture or import of commodity chemicals, industry may find it hard to provide information of the uses of a chemical as it may have a broad range of downstream uses. Industry in this situation may be able to provide possible intended use. However, suppliers of formulated products such as cosmetics would be able to provide the intended use more easily. This information is not included in the existing databases and would need to be provided chemical by chemical or product by product.

**Options for data collection**
Two main options for data collection were provided to the workshop. One was that NICNAS provide lists of chemicals on a regular basis, and industry respond to the specific questions accompanying the lists for each of the chemicals on the list that they introduce. The second was that each company provide a list of all of the chemicals that the individual company uses, with, if possible, introduction volume and use. For the second option, if further information is required on a specific chemical, the follow up questions would be asked only of the companies using the chemical.

NICNAS received diverse views about the proposed options for data collection. The views put forward were:

- Some companies, largely in the formulated products sector, expressed an interest in providing NICNAS with their complete chemical inventory rather then data matching against a list. One perspective was that, once a list of chemicals reaches a size requiring a major data matching effort, it is more time effective for the company to simply provide their entire list.

- A related option was for NICNAS to provide an electronic list of the chemical on AICS, and the companies could indicate which of these chemicals they were using.

- NICNAS undertake an initial "sieving" process to remove a large proportion of the chemicals on AICS, so that industry are required to provide data on a smaller number of chemicals. A number of possible first pass options were proposed, for example using the Canadian high priority group (assuming that the use categories for the chemicals are the same), the HVICL, or a random sample of AICS. NICNAS could then provide industry with a list (or a number of lists) of chemicals to report on. The size of the lists that could be handled by companies at a single time, and the total number of chemicals over a number of lists that could be addressed, could not be determined from workshop responses. One suggestion was that, if use of existing databases could reduce the number of chemicals of interest to 1000, this would be likely to be manageable.

Industry representatives also expressed concern about the time needed to provide the requested information, dependent on level of detail requested, and the consequent cost. Consideration of the time needed by industry to address any individual data request would be an important determinant of the frequency with which data requests could be made.

**Threshold Quantity**
In general, use of a threshold quantity would not have a major impact on the size of the task for the companies represented, although it may be of assistance for smaller companies. If a threshold is used, it should not be mandated that industry not report on chemicals below the threshold, because this would add to the reporting workload. A threshold could be desirable if it was large enough for it to reduce the reporting burden on industry.

**Reporting Period**
The reporting period was relatively flexible with most companies able to provide available information over any requested timeline.

While most companies are able to provide retrospective data, other companies that do not have systems currently in place may find prospective data a more suitable option allowing for inventory systems to be set up to record the data from a proposed date over an agreed time period.

**Further Messages**
Some concerns were raised that all information needs to be handled with strict confidentiality and that the information received will be used only for the purpose of AICS prioritisation.

A chemical can be introduced under different conditions eg discrete chemicals, mixtures, confidentiality status, restrictions in chemical inventory systems, and these each present different challenges. NICNAS may need to consider having multiple reporting options available for industry to provide exposure data in the form that best caters for a company's capabilities instead of a one size fits all approach.

Finally, the industry representatives showed a clear interest in remaining informed about progress in thinking on prioritisation beyond the workshop.

# Attendees – NICNAS Exposure Data Workshop – Tuesday 27 October 2009

| | NAME | ORGANISATION |
|---|---|---|
| **1.** | Phillip **TUDOR** | Huntsman Corporation Australia |
| **2.** | Nick **ZOVKO** | Mobil Oil Australia |
| **3.** | Paul **VERREN** | Nuplex Industries (Aust) Pty Ltd |
| **4.** | Graeme **HALEY** | Engel, Hellyer & Partners P/L |
| **5.** | Margaret **RICHARDS** | Johnson & Johnson Pacific |
| **6.** | Rob **PARBERY** | Johnson & Johnson Pacific |
| **7.** | Bill **HANNA** | Tomago Aluminium Co Pty Ltd (Attending as Rep. of Aust. Aluminium Council Health Panel) |
| **8.** | Dusanka **SABIC** | ACCORD Australasia |
| **9.** | Catherine **OH** | ACCORD Australasia |
| **10.** | Geoff **MacALPINE** | PACIA |
| **11.** | Jennifer **TURNER** | 3M Australia P/L |
| **12.** | Sawsan **FASI** | Prysmian Cables & Systems |
| **13.** | John **O'DONNELL** | Jalco |
| **14.** | Suchhada **PRAK** | Bronson & Jacobs |
| **15.** | Sue **BARTLETT** | True Blue Chemicals |
| **16.** | Phillip **ROY** | DIC Australia |
| **17.** | Alan **LANCE** | A.S. Harrison & Co Pty Ltd |
| **18.** | Brenton **WRIGHT** | SI Group – Australia Pty Ltd |
| **19.** | Leith **DABABNEH** | Procter & Gamble |
| **20.** | Amandine **VINCENT** | Ecotox Services Australasia |
| **21.** | Bruno **LORIZIO** | Brother International (Aust) Pty Ltd |
| **22.** | Peter **IREDALE** | Wiltrading Pty Ltd |
| **23.** | Marion **HEALY** | NICNAS |
| **24.** | Scott **SHERLOCK** | US EPA/NICNAS |
| **25.** | Sneha **SATYA** | NICNAS |
| **26.** | Kerry **NUGENT** | NICNAS |
| **27.** | Janith **WICKRAMARATNA** | NICNAS |
| **28.** | Kate **LIDDELL** | NICNAS |
| **29.** | Justin **ROBERTS** | NICNAS |
| **30.** | David **PERRY** | DEWHA |

**Key Issues and Concerns**

- Hit list of the chemicals in question for data collection
- Minimum supply of data to NICNAS + how + When
- Data collection is not used to restrict the use of item
- What is cost to industry?
- What are the benefits of the whole process?
- More specific examples of what data is required and how it's used
- What inventory system industry has so we can gauge what data can be readily accessed
- Greater burden on larger industry (plus formulated products) because of complexity of inventory management
- What are the means of determining chemicals in commerce
- How are propriety (undisclosed ingredients) going to be handled?
- Specific info (Threshold limits of quantity, hazards) of industry.
- Productive Planning for data systems
- Matching data that contains Management information with chemical information – especially blended o/s
- Mixtures + getting ingredient details. Majority of what we are dealing with.
- Formulated products – difficulty obtaining volume info – time consuming.
- Quality threshold. What are the ranges? Maybe as laborious to determine whether you are above or below threshold.
- Provide information against list on provided information all at once
- More detailed + volume of chemicals = harder
- Manageable list through sieves.

Some of these issues relating to the overall conduct of the prioritisation project were beyond the scope of the workshop on issues relating to data collection, and information on these issues will be provided to interested parties as part of the further consultations on the project planning.