



The technical association  
of the European lubricants  
industry



The technical committee  
of petroleum additive  
manufacturers in Europe

# ATIEL/ATC Generic Exposure Scenarios

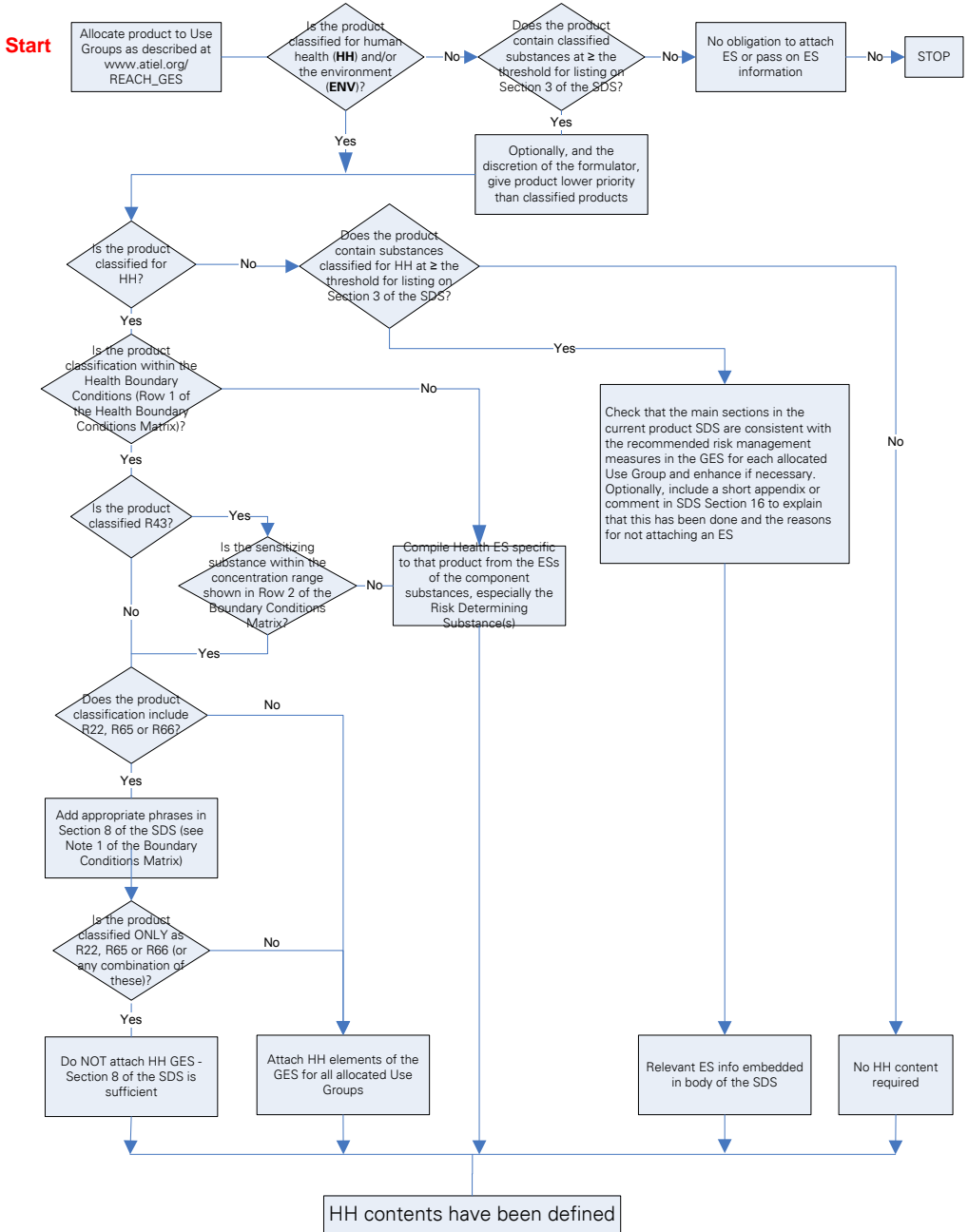
## Document 1: GES Process Flowcharts

**MUST** be used with the document titled **Guidance  
for Applying the ATIEL / ATC GES Process**

Version 1.0  
07 January 2013

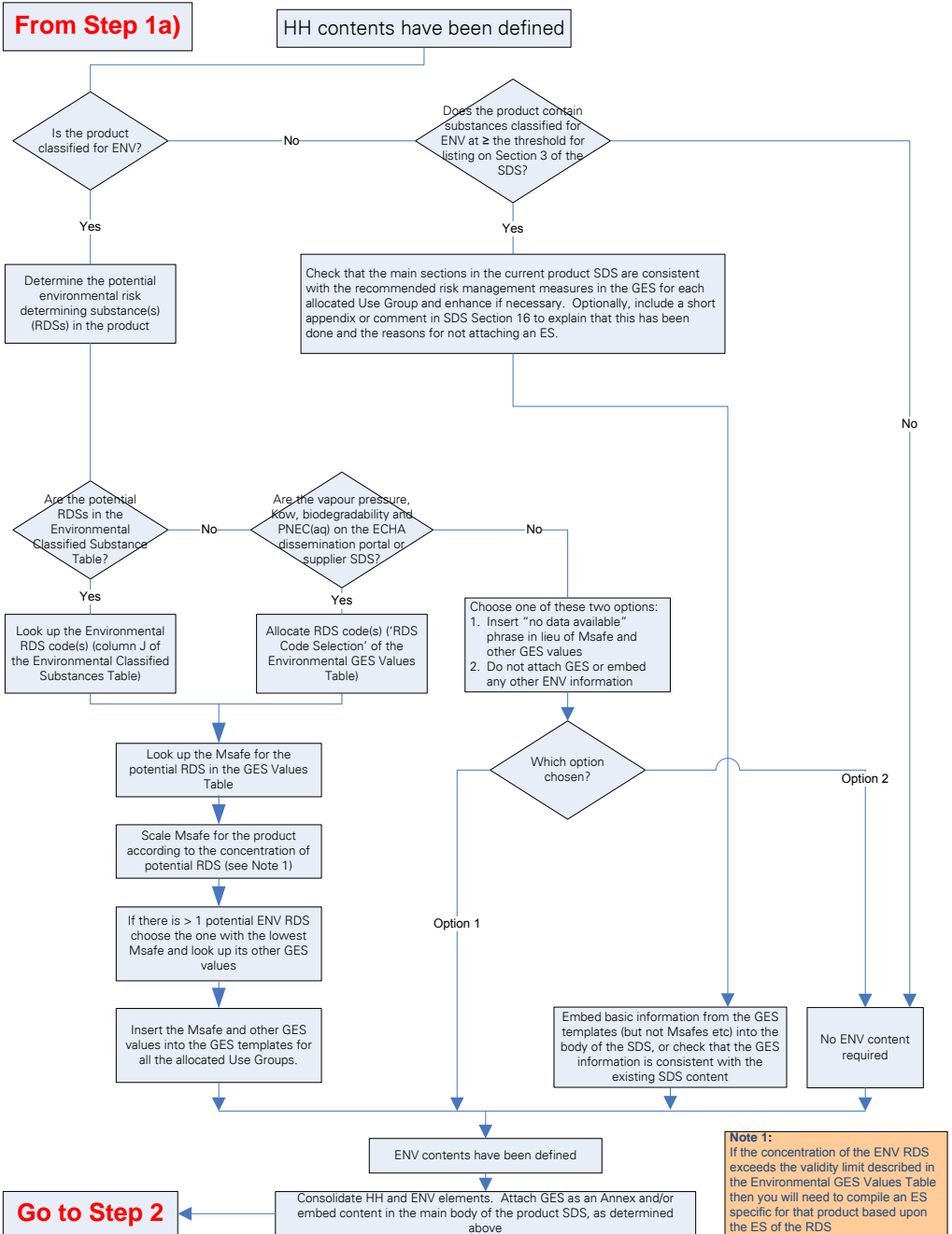
# Step 1a

## Allocate Products to Use Groups and Attach Annex to Product SDS



# Step 1b

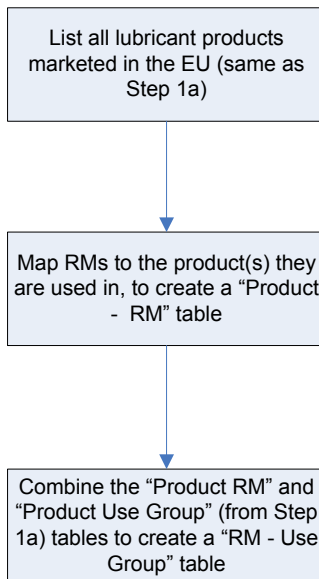
## Allocate **Products** to Use Groups and Attach Annex to Product SDS (continued)



## Step 2

# Allocate Raw Materials (RMs) to Use Groups

### Start

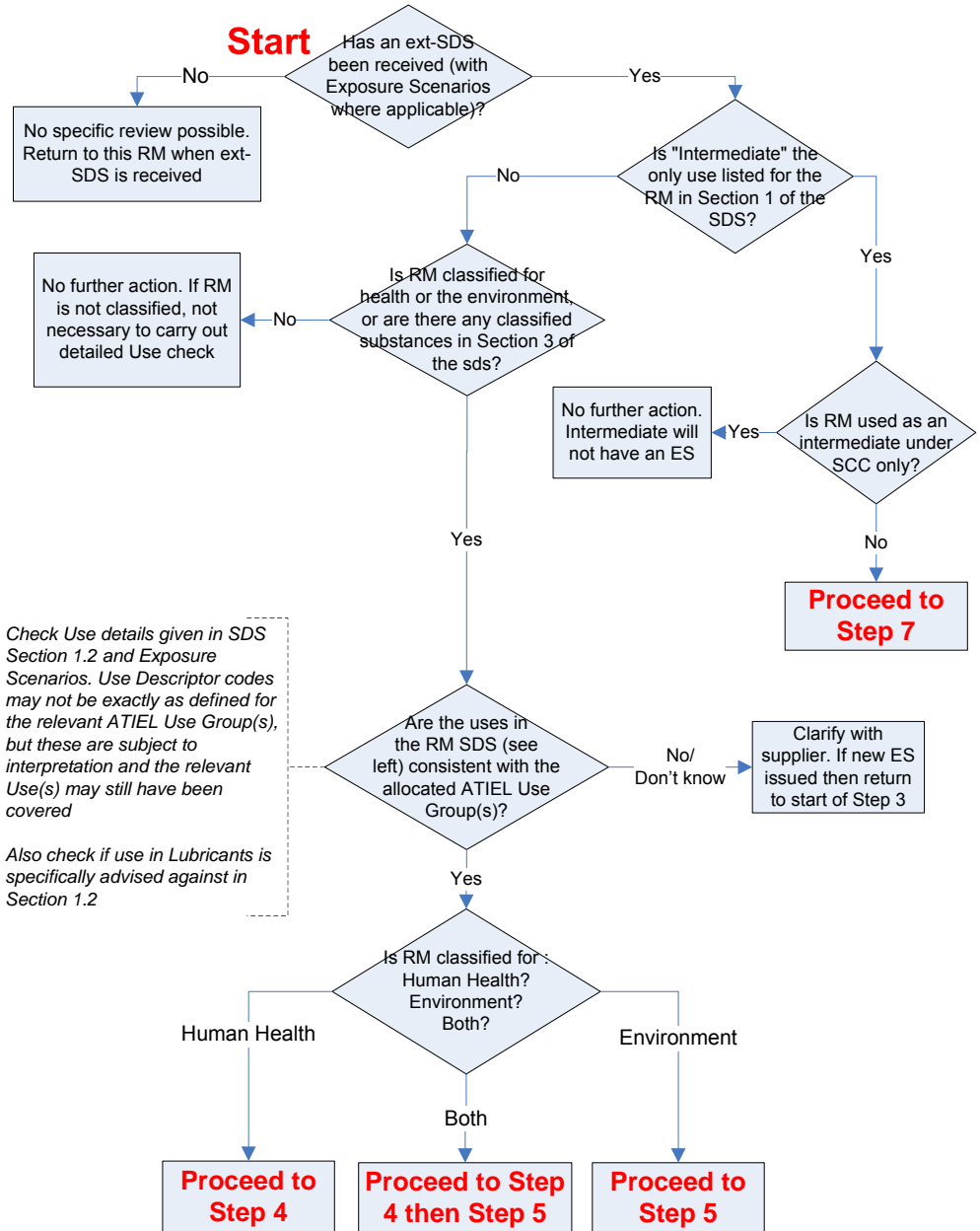


RM is now allocated to one or more ATIEL-ATC Use Group. Now need to check GESs for those Use Groups are consistent with information received about the RM.

### Proceed to Step 3

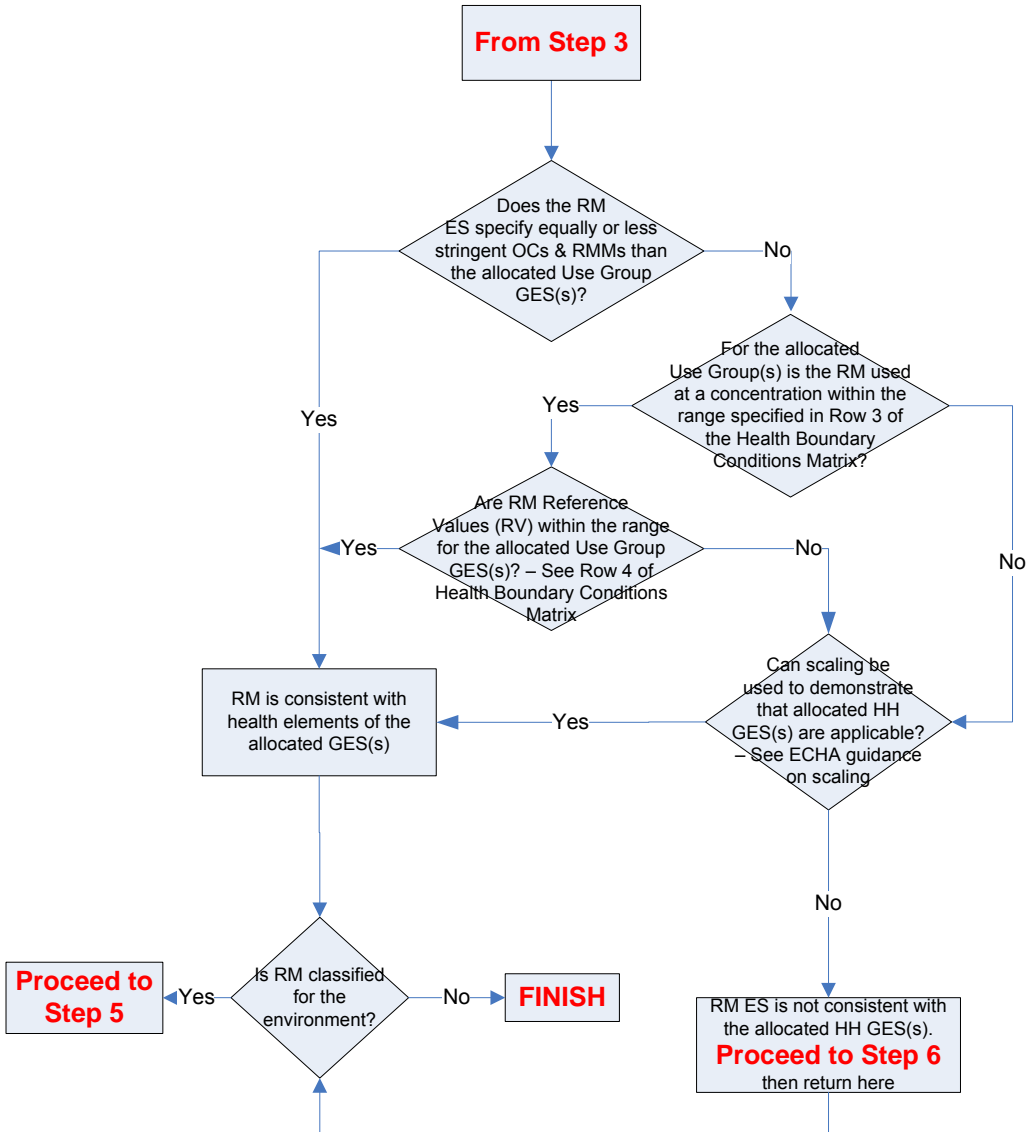
# Step 3

## Check Raw Material ext-SDS is Compatible with the Required Uses



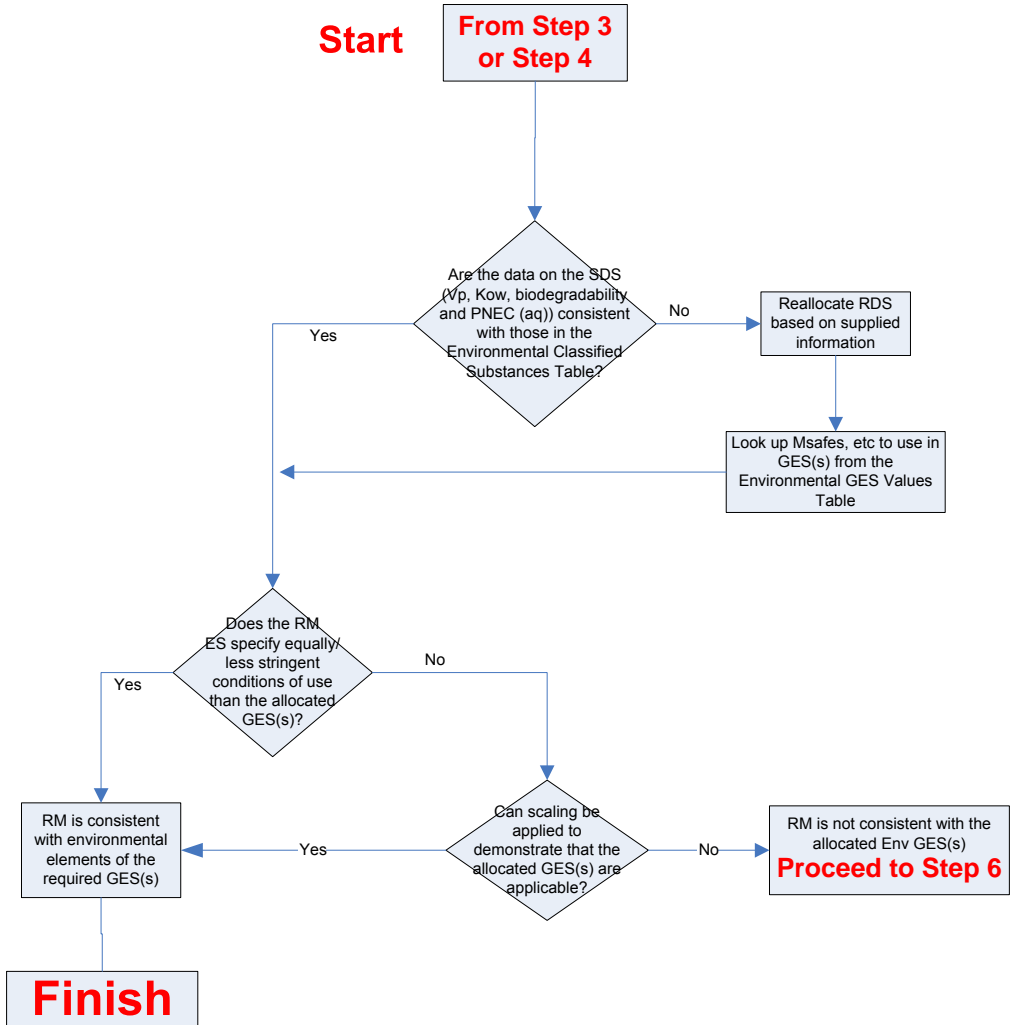
## Step 4

# Confirm Raw Material ext-SDS is consistent with the Human Health GES(s) of the required Use Group(s)



## Step 5

# Confirm Raw Material ext-SDS is consistent with the Environmental GES(s) of the required Use Group



## Step 6

# Options when Raw Material information is not consistent with GES

Options include:

- For the environment, in certain situations the GES can be applied and attached, but this constitutes a DU CSA approach;
- Information unclear in the RM SDS - revert to supplier;
- Carry out own Chemical Safety Assessment (CSA) for the raw material. This might include conducting exposure measurements at site(s) to demonstrate the DNELs and PNECs are not exceeded when using the OCs and RMMs specified in the GES;
  - If CSA shows GES is adequate then apply the GES;
  - if CSA shows GES is not adequate then create an ES specific for the product(s) that contain the RM
- Incorporate more stringent OCs/RMMs (as defined by the RM ES) into the GES to create an ES specific for the product(s) that contain the RM;
- Seek alternative supplier(s) and/or raw material(s) and review their ES for consistency with GES.



## Step 7

**If an RM is not used as an intermediate under Strictly Controlled Conditions (SCC), but the supplier lists "intermediate" as the only identified use**

- Confirm if ES is attached, in which case the substance might have been registered as a "full" substance (intermediate not under SCC)
- Contact supplier to confirm registration status and discuss immediate actions required:
  - e.g. supplier upgrades his registration
  - e.g. DU complies with SCC specified by the supplier, and documents these
- Seek alternative supplier who has registered as a full substance