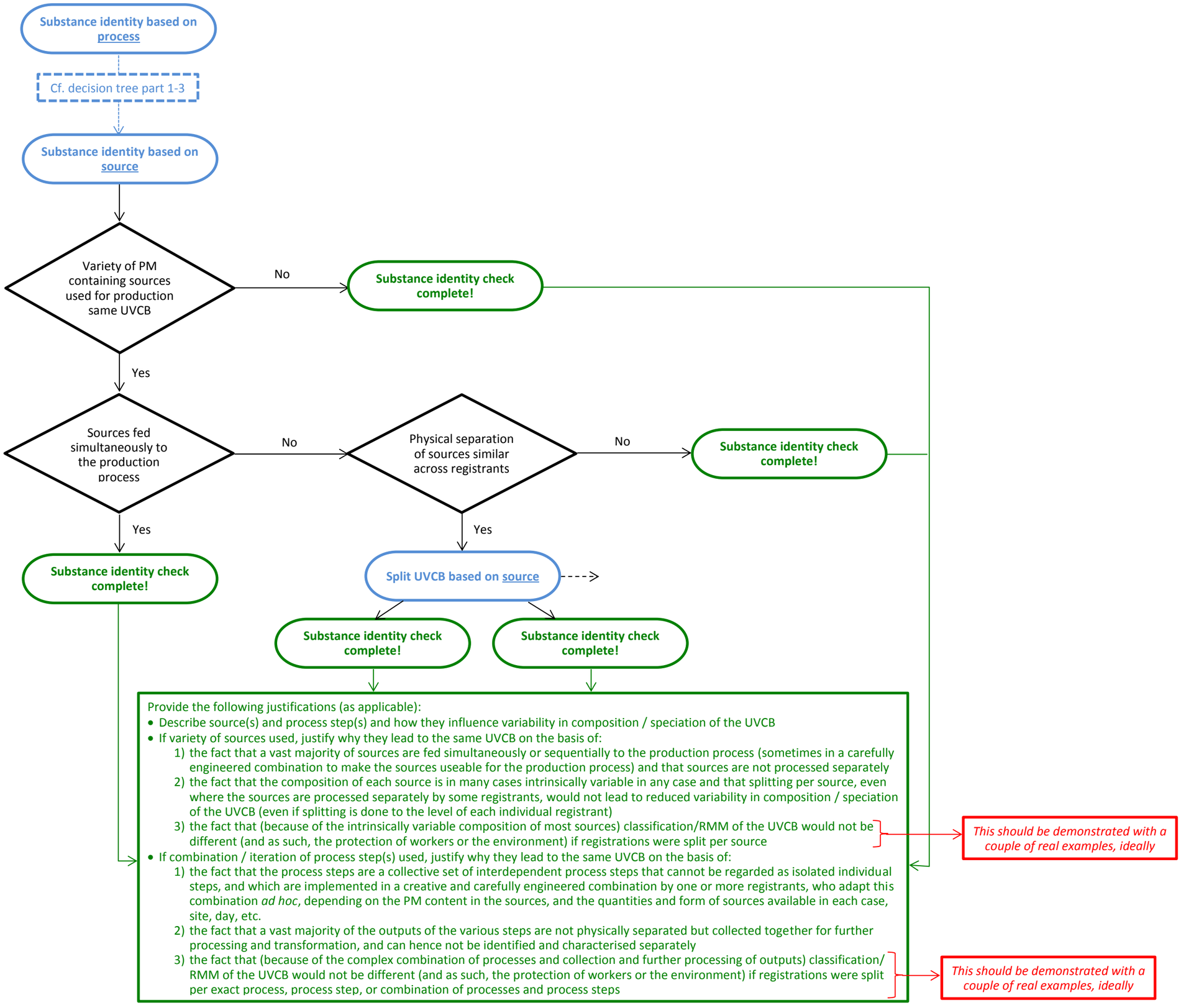
Substance identity based on process
Cf. decision tree part 1-3
Substance identity based on source
Variety of PM containing sources used for production same UVCB
No
Substance identity check complete!
Yes
Sources fed simultaneously to the production process
No
Physical separation of sources similar across registrants
No
Substance identity check complete!
Yes
Substance identity check complete!
Yes
Split UVCB based on source
Substance identity check complete!
Substance identity check complete!
Provide the following justifications (as applicable):
• Describe source(s) and process step(s) and how they influence variability in composition / speciation of the UVCB
• If variety of sources used, justify why they lead to the same UVCB on the basis of:
1) the fact that a vast majority of sources are fed simultaneously or sequentially to the production process (sometimes in a carefully engineered combination to make the sources useable for the production process) and that sources are not processed separately
2) the fact that the composition of each source is in many cases intrinsically variable in any case and that splitting per source, even where the sources are processed separately by some registrants, would not lead to reduced variability in composition / speciation of the UVCB (even if splitting is done to the level of each individual registrant)
3) the fact that (because of the intrinsically variable composition of most sources) classification/RMM of the UVCB would not be different (and as such, the protection of workers or the environment) if registrations were split per source
• If combination / iteration of process step(s) used, justify why they lead to the same UVCB on the basis of:
1) the fact that the process steps are a collective set of interdependent process steps that cannot be regarded as isolated individual steps, and which are implemented in a creative and carefully engineered combination by one or more registrants, who adapt this combination ad hoc, depending on the PM content in the sources, and the quantities and form of sources available in each case, site, day, etc.
2) the fact that a vast majority of the outputs of the various steps are not physically separated but collected together for further processing and transformation, and can hence not be identified and characterised separately
3) the fact that (because of the complex combination of processes and collection and further processing of outputs) classification/ RMM of the UVCB would not be different (and as such, the protection of workers or the environment) if registrations were split per exact process, process step, or combination of processes and process steps
This should be demonstrated with a couple of real examples, ideally
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