



## **To Suppliers of offshore chemicals for operators in Denmark**

Suppliers of offshore chemicals to operators in Denmark have to register their products at the Danish Product Register as described in the note "Registration of offshore chemicals in Denmark". To get a permission to use these products in Denmark the operator has to apply for permission for use and discharge at the Danish Environmental Protection Agency (hereafter referred to as DEPA). As a supplement for this application the operator need to send in a pre-screening for every single product.

DEPA controls the information in the pre-screenings against the information in the Product Register. This information is treated confidentially. Never the less we also have to inform, that DEPA will not permit use and discharge of offshore chemicals for which the information found through pre-screenings done by the operators is not comparable to the information in the Products Register at the check done by DEPA, unless a reasonable explanation has been given through the HOCNF sent in to DEPA.

In such cases DEPA will only tell the operator that the information in their pre-screening is not identical with the information in the Products Register (but without telling anything about which kind of information not being identical), and ask the operator to get the proper information from the supplier and/or to send the HOCNF that forms the basis for the information in the Products Register confidentially to DEPA, but also ask the Product Register by direct contact if they have got any further explanation from the supplier.

It is important for DEPA that the operator is informed by the supplier as stated in the OSPAR guidelines for completing the HOCNF in a way which make it possible to evaluate the pre-screening categories for the substances and the approximate fractions of the substances in the product. If not the operators calculations of the amounts of these categories will be wrong and thereby also the yearly report from Denmark to OSPAR.

At the next pages an imaginary example as in the Products Register is compared to some examples of pre-screenings rejected from DEPA for different reasons.

As in the Products Register

Substance	Fraction %	Evaluation
CAS: A	4	(PLONOR)
CAS: B	8	
CAS: C	20	
CAS: D	4	(PLONOR)
CAS: E	7	
CAS: F	35	
CAS: G	4	(PLONOR)
CAS: H	6	
Water	12	

Pre-screening from the operator

Substance	Fraction %	Evaluation
CAS: A	2,5-10	PLONOR
CAS: B	2,5-10	Ranking
CAS:	10-25	Ranking
CAS: D	2,5-10	PLONOR
CAS: E	2,5-10	Ranking
CAS:	25-50	Ranking
CAS: G	2,5-10	PLONOR
CAS: H	2,5-10	Ranking

This is OK. The PLONOR's are defined by their CAS numbers. The fractions are inside the declared concentration ranges. The information of MW, logPow, biodeg and tox is OK for the single substances. Therefore it is possible to evaluate whether the single substance is Ranking or Substitution candidate. Those substances with nearly same fractions are identified through their CAS number.

Pre-screening from the operator

Substance	Fraction %	Evaluation
CAS:	2,5-10	PLONOR
CAS:	2,5-10	Ranking
CAS:	10-25	Ranking
CAS:	2,5-10	PLONOR
CAS:	2,5-10	PLONOR
CAS:	25-50	Ranking
CAS:	2,5-10	PLONOR
CAS:	2,5-10	Ranking

Will be rejected because PLONOR's are not defined by their CAS numbers and there are four PLONOR's instead of three, and too many nearly identical fractions without CAS number.

Pre-screening from the operator

Substance	Fraction %	Evaluation
CAS: A	2,5-10	PLONOR
CAS:	2,5-10	Ranking
CAS:	10-25	Ranking
CAS: D	2,5-10	PLONOR
CAS: G	2,5-10	PLONOR
CAS:	2,5-10	Ranking

Will be rejected because the number of substances is not identical to the number in the Products Register if not the contact from DEPA to the Product Register gives a reasonable explanation.

#### Pre-screening from the operator

Substance	Fraction %	Evaluation
CAS: A	2,5-10	PLONOR
CAS:	2,5-10	Ranking
CAS:	10-25	Ranking
CAS: D	2,5-10	PLONOR
CAS:	2,5-10	Ranking
CAS:	10-25	Ranking
CAS: G	2,5-10	PLONOR
CAS:	2,5-10	Ranking

Will be rejected. For substance no. 6 the fraction is outside the declared concentration range.

#### The only ways to solve the problems for the rejected pre-screenings will be

1. The operator ask the supplier to send proper information to the operator which then send a corrected pre-screening to DEPA
2. The operator asks the supplier to send (confidentially) the HOCNF being the basis for the information in the Products Register to DEPA to look for misunderstandings. DEPA then either correct its point of view or ask the supplier to give the operator corrected information to be able to make a proper pre-screening and send it to DEPA.

By rejecting the pre-screening DEPA will follow the precaution principle and evaluate the product as a red product (substitution candidate). Red products are not allowed to be discharged to the Danish part of the North Sea. The operator will therefore normally be given 1-2 month to correct the pre-screening or to find a substituting product.

#### General rules for pre-screenings

- PLONOR-substances have to be identified by their CAS no. or by special reference to the PLONOR list for those few without any CAS no.
- The fraction of the substance must be covered by the interval in the pre-screening, and the interval must be precise related to the rules in §1.6 in the OSPAR Guidelines for HOCNF.
- The value for the MW must be given for each substance (except for water and PLONOR-substances) in the pre-screening.

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