

When and how do I have to report uses advised against in my SDS?

Annex II of REACH (requirements for the compilation of safety data sheets) states that in section 1.2 of the SDS: “The uses which the supplier advises against and why shall, where applicable, be stated. This need not be an exhaustive list.” The explanation on this point below is partly derived from the “Guidance on the compilation of Safety Data Sheets”, version 1.1.

When for a substance or mixture the supplier is aware of uses for which the substance or mixture is not suited, or for which no RMMS are sufficient to adequately reduce possible risks for humans or the environment, these uses advised against and why have to be stated in section 1.2 of the SDS. This awareness may emanate from (i) substances or mixtures that have undergone a Chemical Safety Assessment (CSA) according to Annex I of REACH point 7.2.3, (ii) a non-statutory recommendation of the registrant of the substance as such or in the mixture containing the substance, or (iii) a non-statutory recommendation of the supplier, which might also have its basis in technical reasons. The latter may be important for suppliers of mixtures, when there are indications that in the market products are used in another way than was mentioned in the SDS, and there are reasons to believe this different use is not safe.

The information in the sub-section on uses advised against must be consistent with the information in section 3.6 of IUCLID (Uses Advised Against) for substances for which a registration is required. Uses advised against may also be reported with a generic description of the use(s) and/or using elements of the Use Descriptor system

An example of how this sub-section could look, including an illustrative entry is given below:

1.2. Relevant identified uses of the substance or mixture and uses advised against

Relevant identified uses: Consumer uses [SU 21]; Ink and Toners [PC18].

Uses advised against: Consumer uses [SU 21]; Coatings and paints, thinners, paint removers [PC9a].

Reason why uses advised against: Use on large surface area without respiratory protection would potentially give excessive exposure to vapour.

It may also be useful to indicate where the uses advised against emanate from.

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