

Process in companies after receiving an (extended) SDS

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This document addresses the process of how to handle the information from the main body of the Safety Data Sheet (SDS), regardless of whether the SDS is extended or not¹. The main goal is to support companies in the management of the compliance with the incoming (ext-)SDS. For more information on the compliance of the annex (Exposure Scenarios) please have a look to:

http://www.cefic.org/Documents/IndustrySupport/Cefic%20communication%20on%20extSDS_130711.pdf

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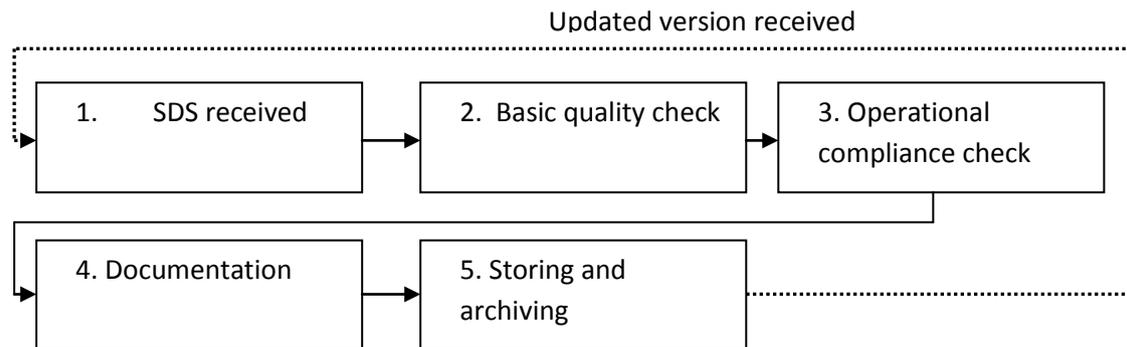
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¹ Please note that the term Safety Data Sheet (SDS) is used throughout the document but it covers both SDS that are extended or not.



Example of a process in companies to ensure the processing of the information after receiving an (extended) SDS:

The flowchart below shows an example of the internal process that should be triggered in a company when a new SDS is received, regardless of whether it is extended or not. The notes below are considerations for companies to bear in mind when designing their own processes:



1.- Receiving the SDS:

- Often SDSs arrive to different places in the company e.g. purchasing department, HSE, plant, etc. In order to make the internal collection and distribution more convenient, companies may consider installing a specific e-mail address for SDS income. In this case, suppliers may be informed.
- The SDS may also arrive in different forms e.g. pdf attachment, e-mail with direct link to the SDS on the suppliers' website, etc. In this context, see the Cefic paper on electronic sending of SDS for more information: *(this paper will soon be published on Cefic website: <http://www.cefic.org/Industry-support/Implementing-reach/Guidances-and-Tools1/>)*
- It should be noted that this process of handling of incoming SDS applies not only to raw materials, but also to maintenance products, laboratory products, cleaning products, lubricants, etc. Necessary processes have to be put in place for such products too.
- Make sure the latest version is the one you review, in particular if several updates are received in a short period of time.

→ Make sure that all the relevant people in the company know the process for how to handle incoming SDSs. It is recommended to have this process described in an internal document.

2.- Basic quality check:

- This check includes the basic elements that can be quickly verified upon receiving the SDS, such as;
 - The SDS is in the language of the country where the operations take place
 - The SDS corresponds to the substance used by the company
 - The supplier in section 1 corresponds to the one in the label of the product
 - All 16 sections and mandatory (sub-)headings are present
 - The pages are numbered
 - Version, revision numbers and date are available
 - An email address to contact the supplier is given in section 1
 - In case section 15 includes that an chemical safety assessment has been performed, the Exposure Scenario (ES) is attached
- This task can be carried out by the receiving person if they are properly trained, regardless of which part of the company they belong to
- If the outcome of this check is that the company decides that the SDS cannot be accepted, it is advised that the SDS is returned to the supplier (specify what you found to be non-compliant when you do so). This can be done via the responsible department within your own company. This rejection should be documented. As long as this is an on-going dialogue, attention must still be given to the content of the SDS particularly the recommendations on safe use.
- This step may be skipped and be included in the step 3: Operational compliance check

3.- Operational compliance check:

- The responsible person for operations is ultimately accountable for the operations' compliance with the SDS. However, he can delegate (part of) these tasks to colleagues or even outsource to external service providers.
- Annex I gives a detailed explanation of the potential actions that may be triggered due to the review of each section of the main body of the SDS. For the ES in the annex, see paper available on Cefic website including a check-list:
http://www.cefic.org/Documents/IndustrySupport/Cefic%20communication%20on%20extSDS_130711.pdf

4.- Documentation:

- The outcome of step 3, the operational compliance check, needs to be documented including:
 - Conclusion of the Operational compliance check
 - Action plan / follow-up processes

5.- Storing and archiving:

Each company has a different system to store the received SDS. This system can go from a basic printing and filing to a sophisticated document management system. Regardless of which system is chosen, it must allow the company to:

- easily retrieve the latest version of the SDS within a reasonable time
- search for the relevant SDS according to different criteria e.g. supplier, substance, trade name, etc.
- store all SDSs for the same product, received from different suppliers,
- information from the SDS must be made available to workers in a suitable format
- workers must be able to easily access the information from the SDS (or the actual SDS if required by the applicable national legislation)
- record the receiving and acceptance date of an SDS, as REACH gives 12 months to implement the Operational Conditions (OC) and Risk Management Measures (RMM) in the ES. It is important to be able to trace and record when the clock starts ticking

Companies should not forget to store/archive - in addition to the actual SDS - the outcome of the operational compliance check. This may be very useful for future inspections as well as to keep record of efforts to comply.

It is recommended to keep old versions of SDS. The ECHA Guidance on SDS section 3.10 includes:

The first sentence of Article 36(1) of REACH requires that:

“1. Each manufacturer, importer, downstream user and distributor shall assemble and keep available all the information he requires to carry out his duties under this Regulation for a period of at least 10 years after he last manufactured, imported, supplied or used the substance or mixture”.

There is no reference in this text (or in the revision of Annex II) to a requirement for the actors in the supply chain to keep copies of SDSs and/or outdated versions thereof for any specified period. Both the suppliers of SDSs and potentially their recipients should consider these documents as part of the “the information he requires to carry out his duties under this Regulation” which is to be retained for a minimum period of 10 years. [...] Holders of both SDSs and other information may in any case decide that it should be retained for product liability and other legal requirements and it might be considered appropriate (for example for products with chronic effects) to keep this information for a period of more than 10 years, depending on the applicable national laws and regulations.

6. Updated version received :

In cases where an updated version is received, changes should be highlighted.

The entire process may then be triggered with specific attention to the sections that have been changed. The procedure for how to deal with updates should also be documented.

Q&As on potential problems companies may encounter

SDS come in different languages, if the assessment is done in a centralised team, it may help to have another language e.g. English version. How to handle this language consideration?

Many international companies handle the incoming SDSs in a centralised organisation. Of course all incoming SDS are in the national language and as there might be legal entities in a variety of EU member states, this can pose a language difficulty for the staff in the central organisation.

A variety of solutions exist, among which are:

- translating the documents, but then one might face an issue in quality and cost as well as liability.
- asking an additional language version from the suppliers, next to the legally required national version. This request of asking an additional language can also be handled during the suppliers negotiation phase and can be embedded in the contract with the supplier.

Suppliers may also provide links to different languages on their websites, so customers can then download the language version they require. In this case, attention needs to be given to the national requirements in section 8&15 which may be those of the country of the chosen language, and therefore not applicable to the country where the operations take place.

E.g. a company has operations in Belgium, but would like to have the English version of the SDS too. The country-specific requirements of the English version may be related to UK-national legislation and therefore not applicable to Belgium.

Different suppliers for the same substances → different SDS sometimes with major differences in RMM. What if one supplier has an ES and another supplier has not?

If one supplier has an ES, and another does not have it:

1. There might be a good reason for it like different impurities, different tonnage bands etc.
2. If RMMs are different: explore the options to align the RMM's by the means of scaling.
3. If for instance supplier A has an ES attached, supplier B does not, there should be an explanation in section 15.2 of the body of supplier B why there isn't any ES.

What if the ES is not available in the local language? Does the clock start ticking?

The clock starts ticking when the extended SDS is accepted by the recipient. If it is not accepted, you must contact the supplier and ask for a translation and document your request.

If you accept the ES in English, then the clock starts ticking. If you translate it yourself, quality of the translation could be an issue.

ANNEX I: Potential follow-up actions for each section of the SDS

This check-list should be used by companies to check if their operations are in compliance with the received SDS from the suppliers, regardless of whether the SDS is extended or not. Please note that in order to understand an SDS and assess the necessary actions, certain level of expertise is required.

This list only covers the main body of the SDS. For compliance with the ES in Annex, please consult the paper 'Messages to communicate in the supply chain on extended SDS for substances II'. This document has been jointly prepared by Cefic, Concawe, FECC and DUCC and includes a check-list for those receiving an extended SDS:

<http://www.cefic.org/Industry-support/Implementing-reach/Guidances-and-Tools1/>

This check-list addresses the main issues for pure substances as well as for mixtures acknowledging that in some cases, ES for mixtures can be integrated in the main body of the SDS, and that ES for mixtures have not been developed so far. Checking the extended SDS for mixtures can be more complicated in the future.

If any of the following points is missing in the received SDS, or the information is confusing in any section, please contact your supplier.

During the compliance check, new information on safe handling may come up. This can be included in employees' training on the use of hazardous chemicals

Section	Information that must be in this section	Potential actions
SECTION 1: IDENTIFICATION OF THE SUBSTANCE/MIXTURE AND OF THE COMPANY/UNDERTAKING		
1.1 Product identifier	In the case of a substance: -Name (EC or CAS or ...) and -Identification Number	→ Check if this information is consistent with the label → If there is a truncated Registration number (Example: 01 - 1234567890 - 11 - xxxx), make sure you have a template to request your supplier the full number in case an inspector requests it. See Cefic available letter: http://www.cefic.org/Industry-support/Implementing-reach/Guidances-and-Tools1/

	(EC or CAS or ...) In the case of a mixture: Trade Name or Designation	→ Note that not all SDS will have registration numbers (Please consult Cefic paper on SC Comm for more information: http://www.cefic.org/Documents/IndustrySupport/Communication_January2011_final.pdf) → If there is a registration number (truncated or not), check if there are Exposure Scenarios in the annex. If so, you have 12 months to comply with the OCs/RMMs.
1.2 Relevant identified uses of substance or mixture and uses advised against	Identified uses (what the substance or mixture is intended to do)and/or uses advised against (must only be filled out if applicable)	→ Check with area use(s) & if not concurrent => Contact your supplier → If an Exposure Scenario is included – CHECK FOR CONSISTENCY Please consult the Cefic paper on checking the ES in extended SDS for more information: http://www.cefic.org/Industry-support/Implementing-reach/Guidances-and-Tools1/ → If the use is as an “intermediate” under Strictly Controlled Conditions (SCC) → check if you have confirmed SCC to the supplier and check if appropriate documentation for SCC is available
1.3 Details of the supplier of the SDS	Identity/name of producer or importer or only representative or distributor Complete address incl. phone number! Contact regarding SDS information (email address)	→ Check if all required info is there.
1.4 Emergency telephone number	Phone number(s) for emergency contact Info regarding availability, hours,time, specific information	→ Should be available to industrial Hygiene Services and 1 st aid responders / emergency responders
SECTION 2: HAZARDS IDENTIFICATION		

<p>2.1 Classification of substance or mixture</p>	<p>Classification according to 67/548/CEE for substances.</p> <p>or</p> <p>according to 1999/45/CE for mixtures</p> <p>and/or</p> <p>according to 1272/2008/CE (CLP for substances & mixtures)</p>	<p>→ Ensure that information is consistent with internal company documentation</p> <p>→ Ensure storage tanks and pipes are labeled or wear warning signs (Directive 92/58/EEC²) according to the information in the SDS. (Consider that requirements on labeling storage tanks and pipes can depend on your local legislation).</p>
<p>2.2 Label Elements</p>	<p>In the case of a substance:</p> <ul style="list-style-type: none"> - Pictograms <p>CLP</p> <ul style="list-style-type: none"> - Signal words - Hazard statements - Precautionary statements <p>In the case of a mixture:</p> <ul style="list-style-type: none"> - Appropriate symbols or symbol letters in accordance with Directive 1999/45/EC or CLP - Identification of danger 	<p>→ Check that the label elements are consistent with the label on the product</p>

² Please note that this Directive is currently under review to align with the CLP Regulation criteria.

	<ul style="list-style-type: none"> - Risk phrases (R phrases) - Safety advise (S phrases) 	
SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS		
3.1 Substances	3.1 Substances Main constituent Others such as impurities, stabilizers, additives or individual constituents must be listed when they contribute to classification	→If any substance is identified on the current SVHC candidate list, inform business. Link to ECHA SVHC list: http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp
3.2 Mixtures	3.2 Mixtures Dangerous substances exceeding thresholds Registered substances have to be listed together with their registration number (can be truncated).	→If any substance is identified on the current SVHC candidate list, inform business. Link to ECHA SVHC list: http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp → If there is a truncated Registration number (Example: 01 - 1234567890 - 11 - xxxx), make sure you have a template to request your supplier the full number in case an inspector requests it. See Cefic available letter: http://www.cefic.org/Industry-support/Implementing-reach/
SECTION 4: FIRST AID MEASURES		
4.1 Description of 1st aid measures 4.2 Most important symptoms und effects, both acute and delayed 4.3 Indication of any immediate medical attention and special treatment needed	A description for each route of exposure must be listed: inhalation , ingestion, eye, skin	→ Relevant responsible shall verify that all these described measures are covered Examples: <ul style="list-style-type: none"> • Are the required 1st aid measures available (safety/eye showers, fire blankets, anti-dotes, etc.)? • Training and information of employees on exposure recognition conducted? • Training of emergency responders conducted? • PPE for emergency responders conducted? • etc.

SECTION 5: FIREFIGHTING MEASURES		
5.1 Extinguishing media	Suitable/appropriate extinguishing media Unsuitable extinguishing media (Includes reasoning why not suitable)	→ Fire Protection resource to confirm that these are present → Fire Protection resource to confirm that the unsuitable media cannot accidentally be used.
5.2 Special hazards arising from the substance or mixture		→ Fire Protection resource has to confirm that these hazards are known and addressed in the emergency response team training. → Confirm that this information is covered by the relevant company processes, and as such included in area related emergency response training and procedures.
5.3 Advice for firefighters		→ Fire Protection resource to confirm that PPE (Personal Protective Equipment) / RPE (Respiratory Protective Equipment) / SCBA (Self-Contained Breathing Apparatus) is available for fire-fighters. Focus on details such as definition of filter mask type.
SECTION 6: ACCIDENTAL RELEASE MEASURES		
6.1 Personal precautions, protective equipment & emergency procedures	For Non-emergency response personnel it describes: - Suitable PPE - Requirements for removal of ignition sources - Emergency procedures For Emergency response team – fire brigade it describes: - Suitable fabric for firefighter PPE (example: “appropriate Butylene” and “not appropriate PVC”)	→ In case currently used PPE is different from specified PPE: check internally and document if equivalent or better than the supplier (this requires relevant expertise). Consider discussing with supplier and ask him to check if your currently used PPE can be included in the SDS

6.2 Environmental precautions		→ Confirm that the specified precautions can be followed in case needed. (Necessary tools available, people trained, etc)
6.3 Methods and material for containment and cleaning up	Appropriate and inappropriate methods, materials and clean-up techniques shall be listed	→ Confirm that the specified precautions are documented in the emergency procedures, the necessary tools and materials are available, people are trained, and inappropriate measures cannot inadvertently be applied.
6.4 References to other sections		→No action required
SECTION 7: HANDLING AND STORAGE		
<p>→ Ensure information in the exposure scenarios (if available) is not giving contradicting instructions related to handling and storage. → In case of inconsistency: contact supplier.</p>		
7.1 Precautions for safe handling		Check that safe handling precautions are followed. In case of deviations: check internally and document if equivalent or better than the supplier (this requires relevant expertise). Consider discussing with supplier and ask him to check if your current practice can be included in the SDS
7.2 Conditions for safe storage including any incompatibilities		Check that safe storage conditions are followed. → Storage does include storage in a warehouse, a tank farm, but also intermediate storage in a manufacturing area. In case of deviations: → Check internally and document if equivalent or better than the supplier (this requires relevant expertise). Consider discussing with supplier and ask him to check if your current practice can be included in the SDS → Confirm that there are no material incompatibility issues with other materials being stored
7.3 Specific end uses		→Ensure that the information in section 1.2 – “Identified uses” is respected.
SECTION 8: EXPOSURE CONTROLS / PERSONAL PROTECTION		
<p>→ Ensure information in the exposure scenarios (if available) is not contradicting information given in this section r→ In case of inconsistency: contact supplier.</p>		
8.1 Control	Where available,	→ Ensure that the use of this substance or mixture does not pose any risk to the worker, and

parameters	national occupational exposure and biological limit values including the legal basis shall be documented for the substance and each substance of the mixture.	that workplace concentrations are lower than the documented limit values. This can be accomplished via measurements or by expert judgement. Both have to be documented.
8.2 Exposure controls	1. Engineering controls 2. Individual protection measures: Eye protection Skin Hand protection Respiratory protection Protection against thermal hazards 3. Environmental controls	→ In case exposure controls are neither listed in 8.2 nor in the Exposure Scenario, you need to contact supplier → Ensure engineering controls, individual controls and commitments under Community Environmental legislation are implemented → In case other controls are in place than provided by the supplier check internally and document if equivalent or better than the supplier (this requires relevant expertise). Consider discussing with supplier and ask him to check if your currently used protection can be included in the SDS
SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES		
9.1 Information basic physical and chemical properties	Here you need to find chemical and physical property data of the substance	→ If you have new information on hazardous properties, inform your supplier
9.2 Other information		→ Treat the same as information in 9.1
SECTION 10: STABILITY AND REACTIVITY		
10.1 Reactivity to 10.6 Hazardous decomposition	This section of the safety data sheet shall describe the stability of	→ If you have new information on hazardous properties, contact inform your supplier → In case information in this section deviates from information used in former process safety studies, review the process safety study.

products	the substance or mixture and the possibility of hazardous reactions occurring under certain conditions of use and also if released into the environment, including, where appropriate, a reference to the test methods used. If it is stated that a particular property does not apply or if information on a particular property is not available, the reasons shall be given.	
SECTION 11: TOXICOLOGICAL INFORMATION		
11.1 Information on toxicological effects	Here you need to find data for each of the listed toxicological effects. If there is no data provided, justification must be given	<p>→ If you have new information on hazardous properties, inform your supplier</p> <p>→ In case no justification is provided contact supplier!</p>
SECTION 12: ECOLOGICAL INFORMATION		
12.1 -12.6	Here you need to find information on potential eco-toxicological effects of the material.	<p>→ If you have new information on hazardous properties, contact your supplier</p> <p>→ Evaluate all specified data and decide whether they are relevant for example updating your company specific:</p> <ul style="list-style-type: none"> • Emergency Response Plans • Waste Water Treatment facilities • Waste treatment practices

	If there is no data provided, justification must be given	• Etc.
SECTION 13: DISPOSAL CONSIDERATIONS		
13. 1 Waste treatment methods	Here you need to find a description how to deal with your waste.	<p>→ Ensure that existing waste disposal methods comply with described methods.</p> <p>→ In case currently applied waste disposal methods are different from the specified waste disposal methods in the SDS:</p> <ul style="list-style-type: none"> - Either adapt your waste disposal method accordingly or - The competent waste management resource confirms whether the currently applied method is at least equivalent to specified method (this requires relevant expertise) <p>Consider discussing with supplier and ask him to check if your currently used method can be included in the SDS</p>
SECTION 14: TRANSPORT INFORMATION		
14. 1 - 14.7	Here you need to find information on specific measures to ensure safe transport.	→ In case you transport the substance/mixture (e.g. waste containing the substance, sample shipping, storage in external warehouse, return to supplier etc) ensure that shipping papers comply with the specified transport information in the SDS and that transport labels on the packaging are applied accordingly. Involve the Dangerous Goods Safety Advisor.
SECTION 15: REGULATORY INFORMATION		
15.1 Safety, Health and Environmental regulations/legislations specific for the substance or mixture	Other regulations EU & local for instance SEVESO if applicable	<p>→ Ensure compliance</p> <p>→ As an example: If SEVESO is listed as applicable regulation you need to verify that the substance/mixture is considered in your inventory</p> <p>→ Check if the substance or mixture is subject to specific provisions (including authorization or restrictions under REACH)</p>
15.2 Chemical Safety Assessment	<p>→ If Chemical Safety Assessment (CSA) has been done it is indicated here.</p> <p>→ If an exposure assessment for the mixture has been carried out</p>	→ If CSA is not mentioned here there is no need to search for an ES !

	<p>according to article 31.2 of REACH, the supplier may indicate so here. The resulting risk management measures for the mixture will be included in the other sections as appropriate.</p>	
<p>SECTION 16: OTHER INFORMATION</p>		
<p>16. Other information</p>	<p>In this section you may find:</p> <ul style="list-style-type: none"> → Information regarding changes to previous version → List of relevant Hazard statements, Precautionary statements, R-phrases or S-Phrases for dangerous products must be written out. → Advice for training appropriate to workers to ensure protection of human health and the environment. 	<ul style="list-style-type: none"> → Follow up important changes versus previous version of the SDS. See actions in the above sections → Check if content of applicable training packages is compliant and training attendance of all affected employees is recorded.

	Note: This section may (or may not) include a list of Exposure Scenarios	
Annex: ES		For more detailed information on what to do when receiving an extended SDS, please consult the industry guidance: http://www.cefic.org/Documents/IndustrySupport/Cefic%20communication%20on%20extSDS_130711.pdf

For more detailed information on each section of the SDS, see ECHA guidance on SDS:

http://echa.europa.eu/documents/10162/17235/sds_en.pdf