Check-list:
What to do when receiving an extended SDS

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What is an extended SDS?

- SDS with **at least one exposure scenario** (ES) included in the annex.
- The term ‘extended’ is meant to indicate only that the content of the main body of the SDS is extended with an annex
- REACH does not define the format nor the content of the ES attached to the SDS.
- The ECHA guidance on IR/CSA “Exposure Scenario Format” lists examples: http://guidance.echa.europa.eu/docs/guidance_document/information_requirements_ESformat_en.pdf?vers=27_05_10

Not all SDS will be ‘extended’

There are several **valid reasons why an exposure scenario might not be included** as an annex to your supplier’s SDS:

- substances registered in quantities lower than 10 tonnes/year
- substances registered as a transported isolated intermediate under SCC
- substance that does not meet the criteria for classification as hazardous and not assessed to be a PBT or vPvB
- substances exempted from registration
- substances with later registration deadline (2013/2018)

Not all SDS will be ‘extended’ (I)

- ES will therefore normally only be **attached to SDSs after** the relevant hazardous **substance has been registered in your supply chain**

- It is proposed that a supplier should only provide an extended SDS when **both the registration number and the relevant exposure scenarios are ready**

- In the meantime, it is proposed to include a phrase in section 15 to explain that the ESs are under development.

How can I find my ES? (II)

- It is recommended to include in section 16 of the SDS, or as a cover page before the ES, a **table of contents** or an index table summarising all the ESs contained in the annex

- Sending all the ESs to customers may create confusion and result in an extended SDS with a large number of pages, big file size…

- '**Filtering' ES** is recommended when possible: remove ES only relevant for manufacturer, send ES targeted to each customer, etc

What to do: check-list I

- ✓ **Is the substance registered under REACH?**

  → Look for registration number or reason why there is none in section 1 of the SDS (there are valid reasons not to have a registration number)

- ✓ **Is the substance classified as hazardous?**

  → Look for classification in section 2 of the SDS.

  - If registered and classified for human health and/or environment it is likely that there are ESs annexed
  - There are valid reasons for classified substances NOT to have an ES e.g. below 10 tonnes, intermediate…

What to do: check-list II

- ✓ **Have Chapters of the main part of the SDS been modified?**

  → Look for the changes

  - Changes may occur particularly in sections 8, 9, 11 and 12 of the main part of the SDS

  → Check that you don't have any relevant information that contradicts the changes made in the SDS and that could impact the classification of the substance or the DNELs/PNECs

  - If you have such data/information, you are required to contact your supplier

What to do: check-list III

- ✓ **Is your use covered? First screening based on ES title and Use description**

  → Unless you have already done so, translate your uses into a set of use descriptors

  → Look for the ES title and associated combinations of use descriptors that reflect your uses

  → Identify any 'obvious mismatch'

  Note: omission of a particular PROC from the use descriptors provided by your supplier does not automatically mean that your use is not covered because some PROCs may encompass others

What to do: check-list IV

- ✓ **Is your use covered → are OCs and RMMs appropriate?**

  → Check OCs/RMMs for Environment

  → Check OCs/RMMs for Human Health

- ✓ After completion of these checks you should know for most of the cases whether your use is covered by the ESs or not.

What to do: check-list V

1.- **Use is covered** → keep implemented RMMs

2.- **Use as described is covered, but different RMMs and / or OCs** → DU has 12 months to:

- Adjust RMMs
- Discuss with supplier (previous dialogue advised!)
- Scaling
- Carry out DU CSA, check exemptions (DU must report to ECHA within 6 months). For more information see ECHA webinar: http://echa.europa.eu/news/webinars_en.asp

What to do: check-list VI

3.- **Use is not covered:**

- Notify use to supplier, provide sufficient information
- Carry out DU CSA check exemptions (DU must report to ECHA within 6 months)
- Look for alternative supplier

For more information

- Cefic – Concawe – FECC – DUCC paper on Extended SDS
  Cefic key messages on supply chain communication
- Cefic standard letter on registration numbers

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

- DCG paper on uses not covered

http://www.fecc.org/fecc/images/stories/downloads/SHE/dcg_agreed_proposals_uses%20not%20covered%20by%20registration.pdf

- ECHA guidance on IR/CSA

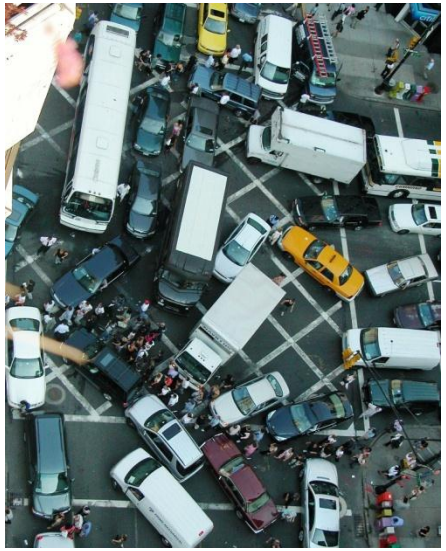
http://guidance.echa.europa.eu/docs/guidance_document/information_requirements_en.htm?time=1308130297

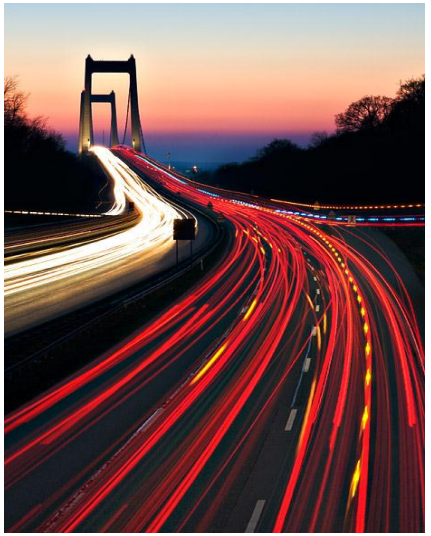
- ECHA guidance on Downstream users obligations

http://guidance.echa.europa.eu/docs/guidance_document/du_en.pdf?vers=29_01_08

Conclusions

- DU responsibilities regarding ES start when the extended SDS is received
- Avoid unnecessary communication in the supply chain
- Top-down approach preferred
- Use industry available standards as much as possible
- Still a lot of uncertainty in the supply chain. This is a new process, all parties in learning mode!
- Informal communication for initial clarification with your supplier is advised





Thank you for your attention!
Any questions?

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