

My Use is not included
now what



Content



- Receiving an updated SDS for a raw material for coatings or printing inks
- Early experiences
- What to do if my conditions of use are not covered
- When should I carry out my own CSA
- Summary

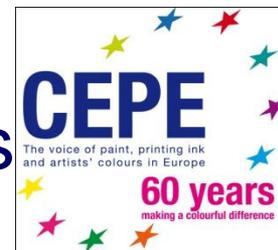


Receiving an updated SDS for a raw material for coatings or printing inks



- Many coatings manufacturers receive new SDS's simply because the old ones were updated to include the CLP classifications for hazardous substances.
These are not ext-SDS's
- If you receive an ext-SDS with a registration number and with annexes that look like ES's, we need to check if our own uses are included:
 - Manufacturing of paint or printing ink
 - Cooking of a resin (polymer) used in our products
- Since many of our customers are SME's, who have limited knowledge about REACH, we also check if our customers' uses are covered
- For larger companies: find out where your updated SDS's could be received: RM administrator, RM warehouse, Purchasing, Credit department, Multi site companies, etc.

Receiving an updated SDS for a raw material for coatings or printing inks



Xylene
Version 3.

Effective Date 09.03.2011

Regulation 1907/2006/EC

Safety Data Sheet

Exposure Scenario - Worker

SECTION 1	EXPOSURE SCENARIO TITLE
Title	Formulation & (re)packing of substances and mixtures - Industrial
Use Descriptor	Sector of Use: SU 3, SU 10 Process Categories: PROC 1, PROC 2, PROC 3, PROC 4, PROC 5, PROC 8a, PROC 8b, PROC 9, PROC 14, PROC 15 Environmental Release Categories: ERC 2, ESVOC SpERC 2.2.v1
Scope of process	Formulation, packing and re-packing of the substance and its mixtures in batch or continuous operations, including storage, materials transfers, mixing, tableting, compression, pelletisation, extrusion, large and small scale packing, sampling, maintenance and associated laboratory activities.

Early experiences



- Our experience is still limited: 25-50 ext-SDS's for medium sized to large companies (one company 100), but many SME's only received a few or even nothing
- This is 10 – 20 % of what we expected, based on the ECHA list of registered substances
- 90 – 95 % deals with single substances only: solvents, additives and crosslinkers (not polymeric)
- Expert judgment is needed! Especially the lengthy and very complete ext-SDS's are not easy to digest. Around 20% requires further investigation
- So far, many ext-SDS's don't create problems. OC's and RMM's from the ES's are well covered by the information we already provide in traditional SDS's (manufacturing coatings and applying them by professionals)

Early experiences

SECTION 2	OPERATIONAL CONDITIONS AND RISK MANAGEMENT MEASURES
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Section 2.1	Control of Worker Exposure
Product Characteristics	
Physical form of product	Liquid, vapour pressure 0.5 - 10 kPa at STP
Concentration of substance in product	Covers percentage substance in the product up to 100 % (unless stated differently);
Frequency and Duration of Use	
Covers daily exposures	up to 8 hours (unless stated differently)
Other Operational Conditions affecting worker Exposure.	
Assumes use at not more than 20°C above ambient temperature (unless stated differently). Assumes a good basic standard of occupational hygiene is implemented	

Contributing scenarios	Risk Management Measures
General measures (skin irritants)	Avoid direct skin contact with product. Identify potential areas for indirect skin contact. Wear gloves (tested to EN374) if hand contact with substance likely. Clean up contamination/spills as soon as they occur. Wash off any skin contamination immediately. Provide basic employee training to prevent / minimise exposures and to report any skin problems that may develop.
General exposures (closed systems)	No other specific measures identified
General exposures (closed systems) with sample collection with occasional controlled exposure.	No other specific measures identified
General exposures (closed systems)	Provide a good standard of general ventilation (not less than 3 to 5 air changes per hour)

Early experiences

Occupational Exposure Controls

Personal Protective Equipment

Eye Protection

: Personal protective equipment (PPE) should meet recommended national standards. Check with PPE suppliers.

: Chemical splash goggles (chemical monogoggles). Approved to EU Standard EN166, AS/NZS:1337.

Hand Protection

: Where hand contact with the product may occur the use of gloves approved to relevant standards (e.g. Europe: EN374, US: F739, AS/NZS:2101) made from the following materials may provide suitable chemical protection: Longer term protection: Viton. Incidental contact/Splash protection: Nitrile rubber. Suitability and durability of a glove is dependent on usage, e.g. frequency and duration of contact, chemical resistance of glove material, glove thickness, dexterity. Always seek advice from glove suppliers. Contaminated gloves should be replaced.

Personal hygiene is a key element of effective hand care.

Gloves must only be worn on clean hands. After using gloves, hands should be washed and dried thoroughly. Application of a non-perfumed moisturizer is recommended.

Body protection

: Chemical resistant gloves/gauntlets, boots, and apron. Where risk of splashing or in spillage clean up, use chemical resistant one-piece overall with integral hood.

Respiratory Protection

: If engineering controls do not maintain airborne concentrations to a level which is adequate to protect worker health, select respiratory protection equipment suitable for the specific conditions of use and meeting relevant legislation. Check with respiratory protective equipment suppliers. Where air-filtering respirators are suitable, select an appropriate combination of mask and filter. Select a filter suitable for organic gases and vapours [boiling point >65 °C (149 °F)] meeting EN14387.

Where air-filtering respirators are unsuitable (e.g., airborne concentrations are high, risk of oxygen deficiency, confined space) use appropriate positive pressure breathing apparatus.



But now we continue with the conclusion
that you cannot find a certain important use.
Which options do you have.....

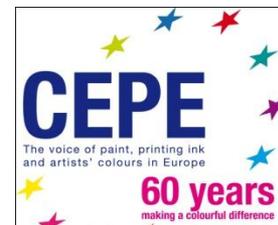


What to do if my conditions of use are not covered



1. Go back to your supplier and ask him to include your use(s) and the ones from your customers.
 - By far the most convenient option for a DU.
 - In many cases the evaluation by the manufacturer will be simple
 - Generally this will take some time. Should your supplier not be willing to include your use in his ext-SDS, or come back to you with an advise against, you have only 12 months to meet your requirements by implementing step 2, 3 or 4.
 - Don't take a "use advised against" for granted. You may have picked up an ext-SDS that was not meant for you!
Some manufacturers have been very helpful to their customers. They only supply the ES's to them which the customers have indicated to be relevant to them. When these documents get spread by email, you may come to wrong conclusions
 - The more ext-SDS's we get, the more this option will be applied e.g. Solvent Resin Manufacturers purchasing solvents for their products: SU-3 and PROC 2/3. These will go via coatings manufacturers to professional users: SU-22 and PROC 10/11

What to do if my conditions of use are not covered



SAFETY DATA SHEET



SECTION 1	IDENTIFICATION OF THE SUBSTANCE / MIXTURE AND OF THE COMPANY / UNDERTAKING
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As of the revision date above, this (M)SDS meets the regulations in the United Kingdom & Ireland.

1.1. PRODUCT IDENTIFIER

Product Name:

Product Description: Dearomatised Hydrocarbons

Registration Name:

Hydrocarbons, C9-C11, n-alkanes, isoalkanes, cyclics, < 2% aromatics

Registration Number:

01-2119463258-33- ; 01-2119463258-33

1.2. RELEVANT IDENTIFIED USES OF THE SUBSTANCE OR MIXTURE AND USES ADVISED AGAINST

Intended Use: Solvent

Identified Uses:

Distribution of substance (PROC1, PROC15, PROC2, PROC3, PROC4, PROC8a, PROC8b, PROC9, SU3, SU8, SU9)

Formulation and (re)packing of substances and mixtures (PROC1, PROC14, PROC15, PROC2, PROC3, PROC4, PROC5, PROC8a, PROC8b, PROC9, SU10)

Use in laboratories - Industrial (PROC10, PROC15, SU3)

Use in laboratories - Professional (PROC10, PROC15, SU3)

Uses advised against: This product is not recommended for any industrial, professional or consumer use other than the Identified Uses above.

What to do if my conditions of use are not covered



2. Adapt your activity to the ES that is supported by the supplier
 - a. Change your OC's and or RMM's in such a way that you meet the ES conditions
This may lead to shorter working days and / or investments
 - b. Tell your customers to change their OC and or RMM's
This may lead to high investments or very impractical ways of working: less hours per day, diluted products with inferior properties, etc. Economic damage
 - c. Adapt the composition of the product / choose another market
Unrealistic for coatings and printing ink manufacturers or customers. We cannot simply change a coatings formulation overnight (< 12 months) and keep the same properties

You only have 12 months to adapt to the ext-SDS's supplied to you on the day one.....

What to do if my conditions of use are not covered



3. Look for an alternative supplier who has included your uses for this substance.
 - Make sure that you are looking to the correct document in the first place.
 - Multiple vs. single sourcing influences your buyer's dependency
 - If it was so easy, why did your initial supplier not include your use
 - Tell your supplier that he will lose your business, because you found a better solution
 - Your 2nd supplier may not have registered yet (no uses included)

Again 12 months to implement the new supplier and to comply with his ext-SDS's

When should I carry out my own CSA



4. Carry out your own Chemical Safety assessment
 - If your use is not included and the previous options did not help, or if you don't want to communicate your use to the registrant, you may need to do an own CSA.
 - It may be an advantage to keep your use unknown to the manufacturer
 - You still need to demonstrate "safe use". After that you have to attach the ES('s) to your SDS. For this it is essential to have DATA on the chemical substance and on the exposure. This may be a limiting factor
 - "Use advised against".... What was the reason behind this?
 - Expertise is required. This may be a problem for SME's
 - You may even be obliged to produce a CSR, but you don't need to submit it to ECHA. There are exemptions to this obligation.

Summary



- If you receive a new ext-SDS you have to check it carefully (develop your expertise)
- When your uses and the ones from your customers are covered, you are OK.
You have at maximum 12 months from the day of receipt to comply with the ES
- If your uses are not covered you have basically 4 choices:
 1. Ask your supplier to update his ext-SDS
 2. Adapt your activity
 3. Choose another supplier
 4. Do your own CSA
- In all cases you have 12 months to complete your activity
- If you use none of these you have to quit the use of the substance

My use is not covered,
but now I know what to do

Thanks for your attention

