



**Supply chain communication:
What to do when receiving an extended SDS**

Cefic RIW IX, 22 June 2011



Hans-Peter Trierweiler
DuPont de Nemours SA

Agenda



- **Communication of registration numbers**
- **What to do when receiving an extended SDS:**
 - What is an extended SDS
 - Not all SDS will be 'extended'
 - Where to find the ES
 - What to do (check-list)

Registration number in SDS



Structure of registration number:

<TYPE>-<BASE-NUMBER>-<CHECKSUM>-<INDEX-NUMBER>

Issues: confidentiality & workability



Company specific!

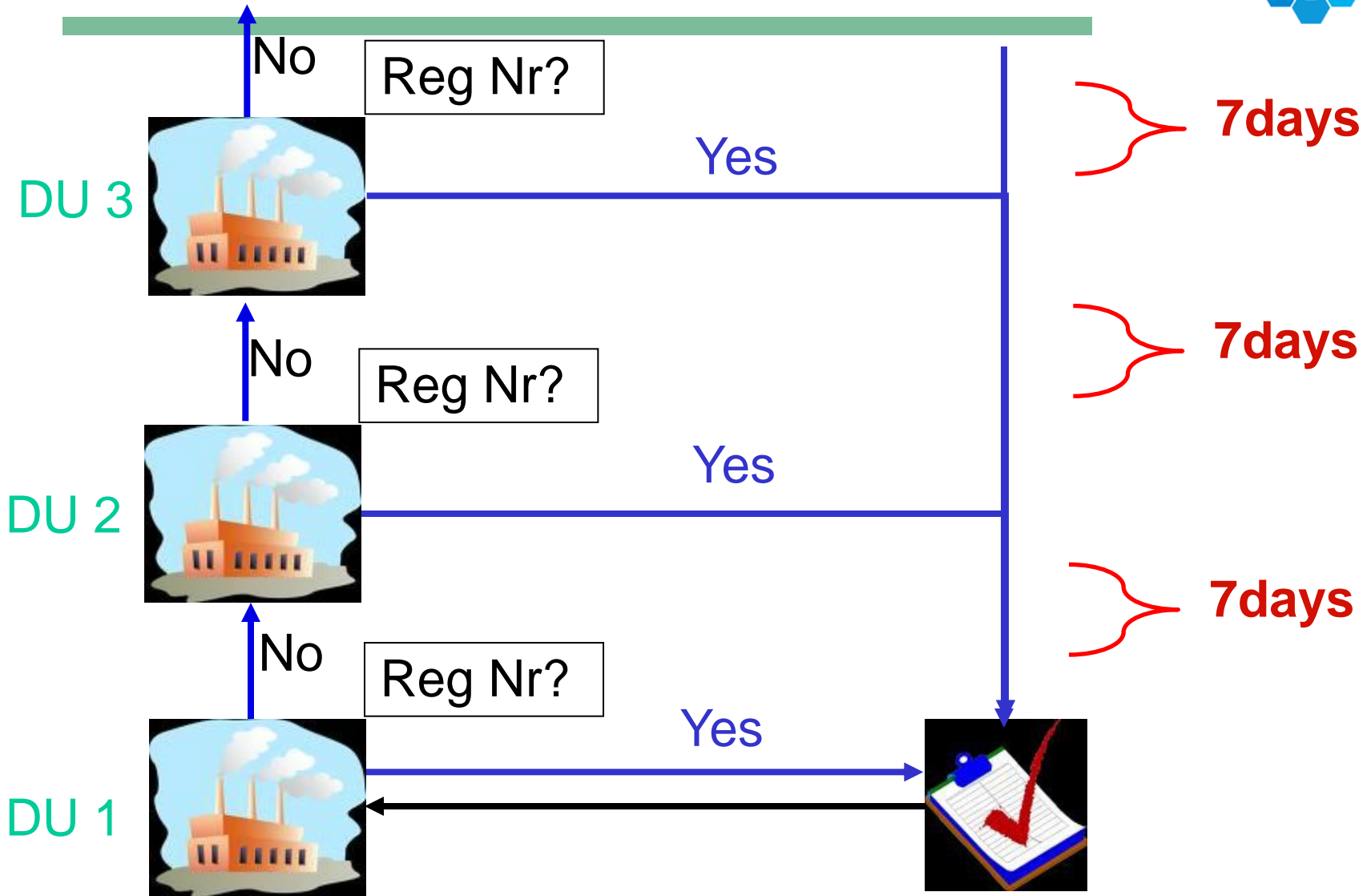
This last 4 digits **may be omitted by a supplier:**

- For substances on their own: distributor or a downstream user
- For substances in mixtures: any supplier

provided that :

- the supplier sends the full registration number upon request to the MS authority within 7 calendar days
- the supplier sends a copy of the request to his supplier within 7 calendar days if the full registration number is not available to him

Annex II: Registration number



This is valid for substances in mixtures above threshold

Communication of Registration numbers



- Cefic has developed a standard letter to be used by companies following an inspection that requests the full registration number
- Letters to be sent to suppliers with copy to authorities
- It is advised **not** to use them to confirm exemptions from registration e.g. polymers
- Letter to be found:
<http://www.cefic.org/Industry-support/Implementing-reach/Documents-and-Tools1/>

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

- ✓ **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 – DUCG paper on Extended SDS
(to be published soon)
- Cefic key messages on supply chain communication
http://www.cefic.org/Documents/IndustrySupport/Communication_January2011_final.pdf
- Cefic standard letter on registration numbers
(to be published soon)
- 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?ime=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?**



International Year of
CHEMISTRY
2011

www.cefic.org