



Industry challenges on preparing and sending SDS



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The Safety Data Sheet

An essential communication tool within the supply chain of substances and mixtures

Regulated by:

- article 31 of REACH as amended by articles 57 and 58 of CLP
- annex II of REACH = Regulation (EU) N°453/2010 (new format applicable since 1 December 2010 to substances and new mixtures)



Need to update SDS

For substances registered according to REACH and classified as dangerous

- Inclusion of registration number
- Exposure scenario in an annex = extended SDS



Need to update SDS

Consistency with classification and labelling

- **Application of CLP**
- **Modifications induced by:**
 - **New knowledge on hazardous properties of substances**
 - **1st ATP of CLP**
- **« Double » classification**
 - **CLP and DSD for substances**
 - **DPD or CLP and DPD for mixtures**



SDS format for mixtures

The « old » (2006) format may still be used until 1 December 2012 for mixtures that were already on the market on 1 December 2010 : « *provided to any recipient* »

- No update necessary, except when modification of classification and labelling (DPD or CLP)



SDS language

« *The SDS shall be supplied in an official language of the Member State(s) where the S or M is placed on the market, unless the MS concerned provide otherwise* » (REACH, art. 31. 5)

- Survey by Cefic : all MS require their official language(s)
- Same requirement for the exposure scenario (some understanding that all translations may not be available yet)



Electronic sending of SDS

« A SDS shall be provided free of charge on paper or electronically... » (REACH, art. 31. 8)

Simply posting a copy of a SDS on a web site alone would not be considered as having complied with the duty to « provide » (draft ECHA SDS guidance)

- Need of specific action by the supplier to provide a SDS and its revisions
- File attached (secured pdf) or direct link to the actual SDS (not to the homepage of a website)



Cefic SDS TF

Objectives:

- To clarify requirements on the content of the SDS and their supply
- To improve the quality of the SDS
- To make SDS more understandable and workable

Key tasks:

- provide practical guidance to companies
- Provide answers to the FAQs from companies
- Identify and share best practices
- Follow the ECHA guidance on SDS
- Follow the activities of the review of Annex IV of the UN GHS
- Share experiences on enforcement of SDS requirements
- Develop proposals for discussion with EU Commission and or ECHA



Challenges for suppliers

Increasing complexity

- **Regulation 453/2010 requires intensive resources to apply (in addition to other requirements)**
- **Very short timelines, not always easy to integrate**
- **Time is needed for appropriation of IT tools (validation, links to company databases...)**
- **ECHA guidance still not published**

Understanding needed from
enforcement authorities



Challenges for suppliers

Increasing complexity

- **Necessity to integrate the options available for deriving SDS for mixtures containing substances with an exposure scenario**
- **Need to address growing concerns from the supply chain**
 - **DUs more and more aware of the importance of the SDS but not always of the actual requirements**
 - **Difficulties to understand lengthy SDS**



THANK YOU FOR YOUR ATTENTION