

# Forum 16

29 October 2013, Helsinki

Joint activities to join the « unreachable » to improve the quality of SDS and to prevent problems with introduction of CLP classification of mixtures



Dr. Erwin Annys

Internet Explorer browser window showing the URL: [http://echa.europa.eu/documents/10162/13577/forum\\_report\\_ref2\\_en.pdf](http://echa.europa.eu/documents/10162/13577/forum_report_ref2_en.pdf). The browser interface includes the address bar, menu bar (File, Edit, Go to, Favorites, Help), toolbar (Back, Forward, Stop, Refresh, Home, Print, Mail, etc.), and navigation controls (Page 1 / 50, Zoom 133%).



EUROPEAN CHEMICALS AGENCY

Forum For Exchange Of  
Information On Enforcement

# Forum REACH-EN-FORCE 2 Project Report

## Obligation of downstream users - formulators of mixtures

[http://echa.europa.eu/documents/10162/13577/forum\\_report\\_ref2\\_en.pdf](http://echa.europa.eu/documents/10162/13577/forum_report_ref2_en.pdf)
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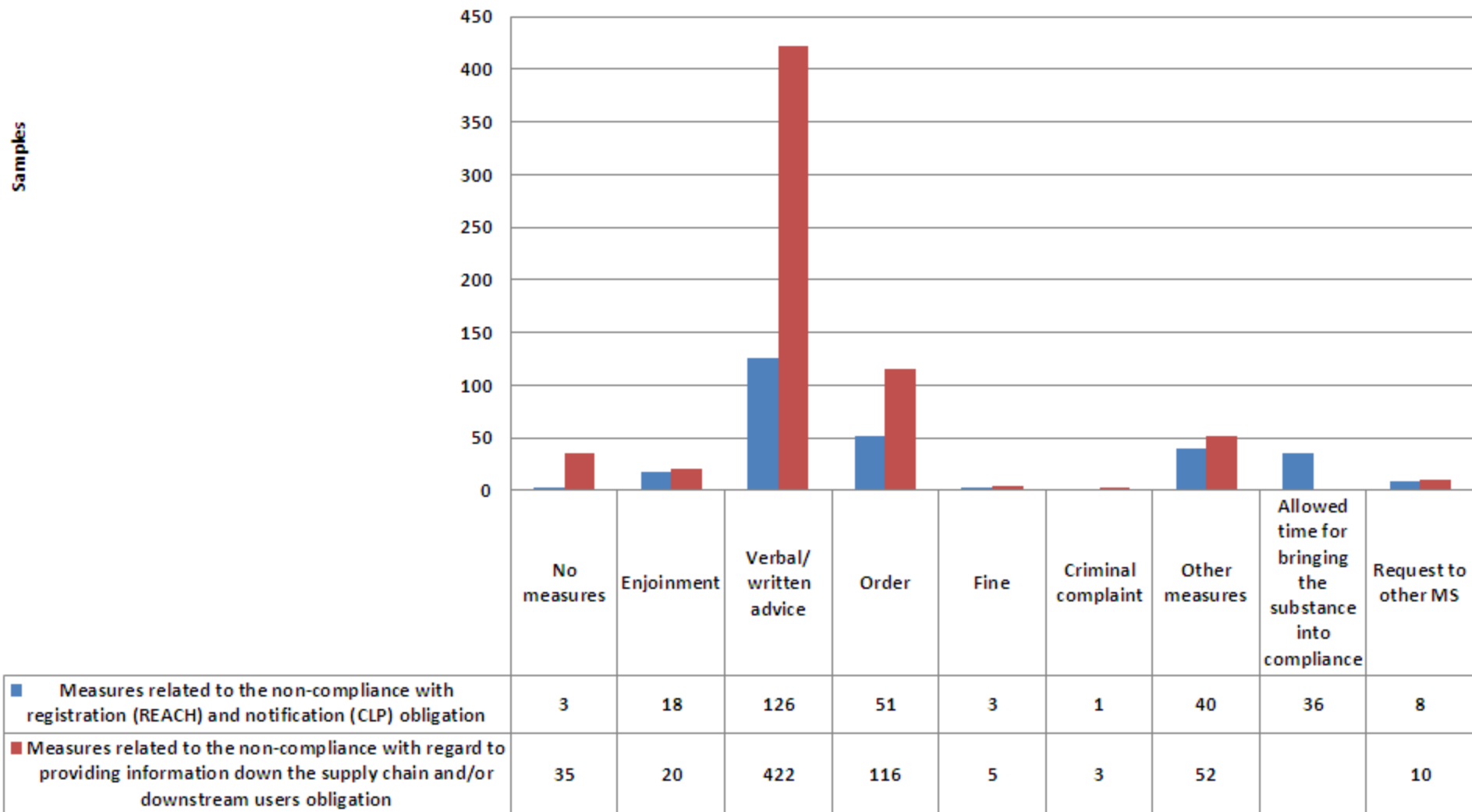
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**Bookmarks**

- 1. Executive summary
- 2. Background
- 3. Results of the project
- 4. Overall conclusions
- 5. Recommendations
- Annexes

Type of violation	Number cases	Cases SME	%	Case non SME
Failure to register	21	9	<1	12
Using unregistered substances in mixtures	131	106	12	23
Failure to notify to C&L inventory	42	36	20	6
Required SDS missing	56	52	5	4
Deficient information in SDS	580	498	52	77
Information obligations acc. Art. 32 REACH not met	18	16	2	2
No access to relevant information for workers	91	83	11	8
insufficient archiving infrastructure/ instruments	205	185	21	18
Other shortcomings	179	154	15	25

## Types of measures imposed by authorities on non-compliant companies



# ECLIPS

„European Classification and Labelling Inspections of Preparations, including Safety Data Sheets“

## *FINAL REPORT*



June 2004

# Structural problem

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- **CLEEN report in 2004 and REF2 in 2013 show comparable problems**
- **What's the origin of the problem?**
  - **Awareness?**
  - **Competence?**
  - **??**

# Is industry pro-active?

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- **Just for the chemical sector**
  - **Based on a check of our national associations (21/22 responded)**
    - **All except three organise on a regular base training sessions for their members and this for many years**
    - **Half of them do this for free (in some cases only for free for their members)**
    - **Some of them do this in collaboration with their competent authorities**
    - **In the vast majority this is open for non members**

# SDS and REACH awareness raising in the past

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- **Cefic and other European trade associations**
- **Their national associations**
- **Authorities**
- **Chambers of Commerce**
- **Commercial organisations providing training**
- **SME training centers**



# What else can we try out?

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- Who contacted helpdesk?
- Inspected companies not being compliant?
- Innovation centers?
- ECRN?
- EEN?

# What do we need?

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- **A training set (train the trainers) in English**
- **Translation in all languages**
- **Trainers for all languages**
- **Not a one shot activity**
- **Who can fund this?**

# CLP for mixtures

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- **So far just SDS for substances**
  - **No exposure scenarios yet**
  - **CLP classification of mixtures mandatory: 01/06/15**
    - **And clearly more difficult than the Dangerous Preparation Directive**
    - **Self-classification of substances is even more complicating this picture because not easily transferable in IT systems**

# CLP for mixtures – what do we need?

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- **General training package**
- **Special attention for mixtures**
- **Practical examples**
- **And especially ....trainers all over Europe**
  - **Cefic's national associations provide training but not always on the same level as for SDS**
  - **Our smaller national associations ask to train the trainers**

# Conclusion

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- **We all have a problem**
  - **An important number of companies is not member of a trade association**
  - **Even for free, a day of training is considered as a day noy having done the regular job**
- **How can we find them? How to convince them to follow training? How to force them to apply it?**
- **A joint activity for industry, authorities and enforcement authorities**



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**Thanks for your attention**