



Human Environment and Transport  
Inspectorate  
*Ministry of Infrastructure and the  
Environment*



# Suggestions to improve the distribution and quality of SDSs by NL

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## Background

- In the past a number of problems were detected in practice with the **distribution of SDSs** (also signals of Stakeholders). Follow-up actions by Ministries and Stakeholder Organizations in NL with cooperation of NEAs
- Based on inspections: actions by NEAs to improve the **quality of SDSs** (non-compliant with Annex II REACH)



# Suggestions to improve the distribution of SDSs/1

## **Best practice for distribution:**

- electronic system for sending SDS to end users, combined with financial information about the delivery of chemicals  
(Paint and Printing Ink association; VVVF)
- cloud based system for fast digital traceability and recall of plant protection chemicals (from manufacturer to end user), including validated SDSs  
(Association for manufactures of plant protection chemicals; Agrodis)



## Suggestions to improve the distribution of SDSs/2

- **Digitalisation of safety data:**

The use of the SDScomXML (<https://www.esdscom.eu/>) standard could improve information exchange in the supply chain:

- now: database programs are compiling flat text pdf to send to recipients, where flat text pdf is transferred into data again
- SDScomXML: transfer of data (in stead of flat text pdf): no mistakes or waste of time



## Major findings of NEAs on the quality of SDSs in NL/1

- **Section 1** missing relevant information about the supplier and the information of the National Poison Information Centre
- **Section 2** the hazard category of the substance or mixture did not always correspond to the information in other categories, or the label requirement was incorrect.
- In **Section 3** errors regularly appeared in the hazard category of the substances. Sometimes errors were also made in the use of concentration ranges for substances in a mixture.
- In **Section 8** many cases appeared in which personal protection equipment (such as gloves) was not specified.
- In **Section 15** the specification of national applicable regulations were occasionally missing.



## Majoor findings on the quality of SDSs in NL/2

### Effects and Severity of the violations

- An incorrect classification of a substance or incorrect labelling elements (section 2) can give wrong precautionary measures. In 2016, incorrect classification or incorrect labelling elements occurred in **40%** of SDSs.
- The lack of specific information about the necessary personal protection equipment, such as the type of gloves that must be used (Section 8) prevent working safely with the product concerned. In 2016 **almost 50%** of SDSs contains this omissions.



## Suggestions to improve the quality of SDSs/1

- **Propagate best practice:** 'Recommendations on glove properties in SDS section 8.2', Guidances of the Dutch Detergents Association (type of material, thickness and minimum breakthrough times) and an app for mobile phones of Dutch Painters Association.

See

[https://www.nvz.nl/files/4414/8215/4048/NVZ\\_GlovesGuidance\\_ENG\\_def.pdf](https://www.nvz.nl/files/4414/8215/4048/NVZ_GlovesGuidance_ENG_def.pdf)

- **Propagate best practice:** the SDS-check: In just 5 minutes, a company (user) will have an insight into the quality of the SDS provided by his supplier. And, if necessary, with just a few clicks, he can ask his supplier for a new SDS.

See <http://www.sds-check.nl/>





## Suggestions to improve the quality of SDSs/2

- **Identify and promote quality criteria for SDS software, like:**
  - Section 1.4 SDS: create an option to select the relevant national poison center in the EU
  - Section 2 SDS:
    - Biocide: create a link between item 1.2 (identified use) and item 2.2 (authorization number of the biocide in the country of use)
    - Danger for skin: create a link between item 2.1 and item 8 (specification of gloves to protect hands);
    - Create standard text for item 4, 5, 6 and 7 when certain classifications are used in item 2.1
  - Section 3.2: create flexibility in the range of concentration of a chemical (not only a fixed minimum or maximum concentration)



## Suggestions to improve the quality of SDSs/3

- Section 3: create a link in the case of sensitising substances between item 3 and item 2.2. (EUH208)
- Section 15: create an option to select the national legislation and EU legislation (like Seveso etc.) on certain chemicals
- Section 16: create a mandatory entry box in case of mixtures, for the indication of which of the methods of evaluating (Article 9 of Regulation (EC) No 1272/2008) was used



## Suggestions to improve the quality of SDSs/4

- **Usability of SDS:** Compliance does not automatically make for usable SDSs. Is the information understandable for the user?

Example: The quality of the new SDSs from paint manufacturers was compliant. However, the gloves were too thick to be used in practice by the painters.

Solution: manufacturers and downstream users together look now for suitable alternatives



## Follow up in the EU

- Suggestions to be discussed in the WG Improvement of SDSs
- Possible cooperation with ENES and SLIC CHEMEX
- Common approach by Stakeholders and NEAs
- Promote quality criteria for SDS software by Stakeholders and NEAs
- Possible pilot projects for some specific subjects



Many Thanks for your attention!

Questions?