

# Learning from enforcement on the supply chain and extended Safety Data Sheet

Workshop on REACH Review Action  
3: Improving the workability and  
quality of Extended Safety Data  
Sheets

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# Overview

- SDS in earlier REF projects (1-4)
- REF5 – ExtSDS, ES, RMM/OC
- ECHA-ASO joint action on SDS
- REACH-OSH enforcement interactions project

## REF Projects 1-4

- REF1: Pre-registration/Registration and SDS obligations (2011)
  - **The quality of the SDS needs to be improved**
- REF2: Obligations of DU - Formulators of mixtures (2013)
  - Sections checked **1, 2, 3, 8, 15**;
  - **52% of 4500 SDS checked had deficiencies**
- REF3: Registration/Cooperation with customs
  - Distribution of SDS (minor issue)
- REF4: Restrictions
  - **>500 SDS used to check for compliance (content of SDS)**

## **REF5 (2018): Extended SDS, ES, RMM and OC**

- Checking coherence of SDS and CSR
- **Availability and distribution of safe use information in the supply chain**
- Implementation of RMM/OC described in ES at workplaces
- All-in-all, raise awareness on extended SDS
  - 375 substances (>1400 controls) – 63% copies of CSR
  - Evidently, poor quality information in CSR
  - 38% of the substances used in mixtures

## Inspectors' experiences...

- Recurring issues - poor translation, quality of the content
- Inconsistencies between main body SDS and ES
- Vague and generic information in ES (and in SDS)
- In some cases, SDS contradicted OSH requirements, e.g. in hierarchy of control
- SDS for mixtures - poor quality; uses of mixture not identified; required information missing.

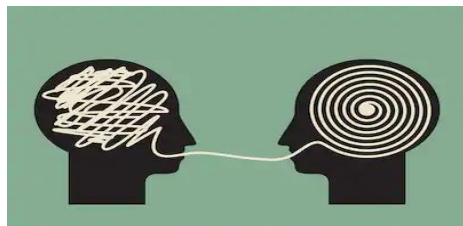
## Recommendation from REF5

- **EU COM:** Prioritise REACH review action point on SDS
- **ECHA:** CSR validity checks; Projects and campaigns on guidance information
- **NEA:** Put in place work programs that support the implementation of the REF-5 objectives – improving CSR; distribution of safe use information; Use the information at workplaces
- **Industry:** Make use of tools generated by ENES (points to RRA3)

# Joint Forum-ASO action on SDS



Identify the common deficiencies found in the SDSs



Seek to understand, together with stakeholders, reasons for the main issues



Recommendations to different stakeholders on way forward



Follow the progress after implementation of the recommendations

## **Main issues (>80% mixtures)**

The most relevant sections:

**1, 2, 3, 7, 8, 9, 10, 11, 12 and 15**

➤ Generally, required information not provided.

Where, provided:

- Generic, not very useful
- Identified uses inadequately described
- Insufficient substance ID
- Incorrect classifications
- Inadequate/incorrect risk management measures
- Inconsistencies between sections



## Some Recommendations

- Guide on description of the identified use and addressing the issue of uses advised against
- Guidance on compilation of mixture SDS.
- Check on availability of software that can be used to compile mixture SDS
- Promote good examples from ASO/Inspector for use by those compiling SDS;
- Online tool to compare available data in SDS to registration data/CL inventory

# REACH-OSH Enforcement Interactions

- Triggered by REACH Review AP 12
  - *Improve coordination of national enforcement authorities responsible for REACH and occupational safety and health (OSH) legislation.*
- Survey; 29 MS replied
- Among issues addressed:
  - Extent to which REACH generated safe use information is used to support workplace risk assessment and other OSH requirements
  - Extent to which OSH inspectors see relevance of REACH safe use information in workplace risk assessment
  - Exchange of information on the quality of safe use information by the relevant REACH and OSH NEAs.

## Conclusion

REACH review AP3 important in:

- Working towards safe use advice that is practically relevant for the recipients:
  - concrete
  - correct
  - understandable
- Move towards a more systematic and effective practice for targetting safety information, and dissemination

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