

Os 3.1 Joint initiative ECHA Forum – ECHA ASOs on Improvement of the quality of SDSs

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WG Chair

Objectives

- Identify the common deficiencies found in the SDSs and propose solutions for improvement and encourage ECHA ASOs to implement the solutions and monitoring the progress.
- To increase the quality of the SDS by the means of pro-active measures taken by industrial stakeholder organisations both at a European and national level.

5.1.1 WG progress report



WG Progress since last open session

- The WG completed the analysis of the main deficiencies found with SDS
- The “Report on Improvement of Quality of SDS” was adopted and published by the Forum
https://echa.europa.eu/documents/10162/22749747/echa_sds_report_en.pdf/0ddb021f-bd1a-09e6-29f3-c52ca476e6aa
- The WG had 2 joint meetings to discuss the content of the report and the way forward

5.1.2 Short presentation of the 'Improvement of quality of SDS' report



Main issues

- no reporting on uses advised against, unclear identified uses and an absence of a required emergency telephone number in Section 1
- incorrect classification in SDS Section 2 and in correlation with this issue, incorrect reporting of concentration ranges of ingredients in mixtures in Section 3
- non provision of national occupational exposure limits and an inadequacy of information provided on control measures, including engineering controls and specific details on personal protective equipment (PPE) in Section 8
- lack of information on the physical/chemical, toxicological and eco-toxicological properties in Sections 9, 11 and 12, with no explanation as to the reason for the absence of the information as required to be stated.

The issues are mainly related to:

1. It not being clear what is expected for certain Sections: 1, 3, 7 and 8
2. Missing information in Sections 1, 2, 7, 8, 9, 10, 11, 12 and 15
3. Information not specific enough, or too generic to be helpful in Sections 7, 8, 11 and 12
4. Consistency between Sections: such as 2 (classification) and 3 (mixture composition), and even subsections 8.1.1 (national OELs) and 8.1.3 (monitoring)
5. Inconsistent or missing information related to ingredient(s) classification in Sections 3, 11 and 12

Recommendations



Overall companies should check and feedback the following:

- That all sections that are required to be completed. When the information is not relevant or available, the reason for this should be indicated as required by the legal text.
- That the safety data sheets are up-to-date with the current chemical legislation i.e. development of harmonised classification
- That there is consistency between the different sections of the safety data sheet

This could be achieved by

- developing guidance to clarify what is expected,
- supporting the development of IT-tools in discussion with service providers,
- publishing good examples,
- raising awareness through promotion campaigns etc.

5.1.1 WG conclusions

The joint WG elaborated a list of actions to improve the quality of SDS



SDS EXAMPLES		
1	ECHA ASOs are invited to share examples of best practice SDS with the WG (one per organisation) [substances / mixtures]	ECHA ASOs
2	ACEA will perform a plausibility check with these examples and share the comments with the providers. The feedback will be provided to the Forum-S.	ACEA
3	WG NEAS volunteering will provide feedback on the SDSs to the Forum-S	WG NEAS
4	Forum-S collects the feedback and sends it to the WG	Forum-S
5	ECHA ASOS to use the feedback to generate best practice SDSs to promote best practice examples in trainings for example	ECHA ASOs

TRAINING		
1	ECHA ASOs commit to organise training on SDS once Annex II is updated considering the involvement of National Sector Organisations and National HelpDesks. The training should include the issues highlighted in the Forum report on improvement of SDS and the examples of best practices with SDSs	ECHA ASOs

PLATFORMS		
1	ECHA ASOs will approach ENES and propose to include the SDS or certain aspects of SDS (i.e. sections 1.2., 7, 8) in the scope of the activities of the ENES	CEFIC/DUCC
2	ENES coordination group to discuss what aspects of the SDS could be considered in the scope	ENES coordination group
3	If ENES mandate is not expanded, ECHA ASOs are invited to bring the SDS discussion in the REACH cross sector group.	CEFIC+?

EUPhraC and SDSCOM		
1	ACEA will invite the Forum to comment on the specificity of the EUPhraC phrases at the open session of the Forum in November 2019 (5 November)	ACEA
2	Forum will consider whether the Forum members are willing to comment on the phrases	Forum
3	The EUphraC group will be invited to consider the feedback provided with the view to amend the phrases	WG EUphraC
4	ECHA ASOs jointly request the SDS software providers to include, maintain and update the phrases in the SDS authoring software	ECHA ASOS

	Different opinions between industry and NEAS /and between different NEAs	
1	ECHA ASOs are invited to highlight areas where there is a need for a harmonised opinion of the enforcement authorities. This can be done through the open sessions of the Forum.	ECHA ASOs

	Involvement in the RRA3 (REACH Review Action 3)	
1	ECHA ASOs who have not yet done it are invited to elaborate sector use maps or those that represent registrants to promote the use of them.	ECHA ASOs

Requests

To the Forum

- The Forum members are invited to comment on the specificity of the EuPhraC phrases related especially to sections 7 and 8 of the SDS.
- The Forum members are invited to adopt the final report of the WG and close the mandate of the WG on the condition of the finalisation of the follow-up actions mentioned in section III.4 of the WG report.

To the ASOs

- To implement the agreed actions and continue with the work to improve the quality of SDS.

WG follow-up actions

- the finalisation of the WG meeting reports;
- the elaboration of the list of comments provided by ECHA ASOs on the Forum report on the improvement of the quality of SDS;
- providing feedback on the good examples of SDS
- the elaboration, analysis and report of a survey for the WG members (ECHA ASOs and NEA members) on the experience with the work in the WG.
- (potentially) the compilation of the feedback provided by Forum members on the EuphraC phrases

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