



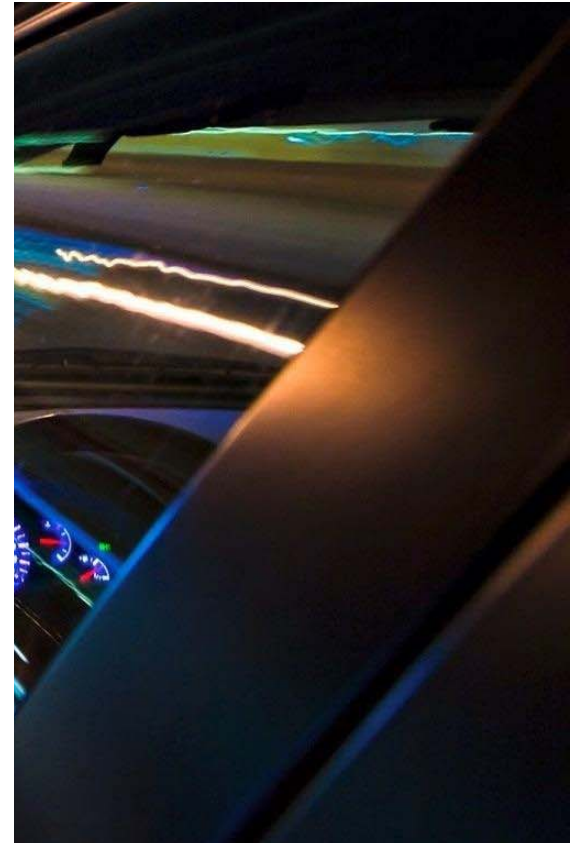
European
Automobile
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Association

SDS Compliance Check Guidance

ECHA FORUM – PUBLIC SESSION

HELSINKI, 06.11.2019

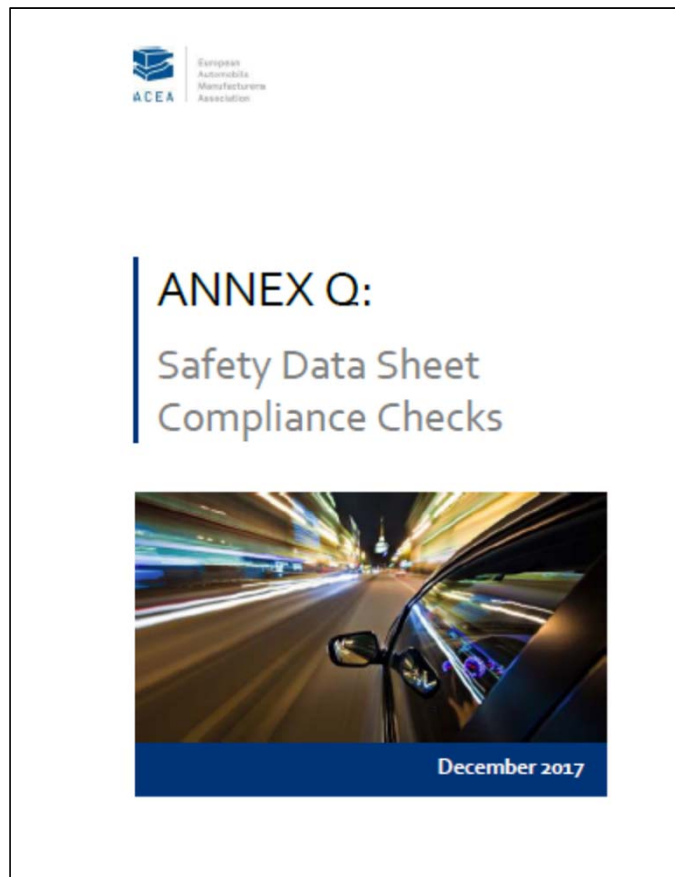
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Tuesday, 06.11.2019



ACEA SDS COMPLIANCE GUIDANCE



Download URL:

<https://www.acea.be/publications/article/reach-safety-data-sheet-compliance-checks>

KEY MESSAGES

- Annex Q to the Automotive Industry Guideline on REACH (AIG-REACH) is titled, “Safety Data Sheet Compliance Checks”, and presents guidance for downstream users on conducting plausibility checks on incoming safety data sheets (SDSs).
- This is seen as necessary to fulfil legal obligations in the light of industry and authority experiences of poor data quality of SDSs in the supply chain.
- The plausibility check guidance is given in a series of steps which may be seen as increasing in complexity.

KEY RECOMMENDATIONS

- The Guidance recommends the following as a minimum appropriate response by downstream users who receive SDSs from their suppliers:
 - Perform a plausibility check of received SDSs at a level appropriate to the circumstances;
 - If there are good reasons for doubting the accuracy or completeness of the SDS, resolve the issue through contact with the supplier
 - In the event of new information on hazardous properties or the appropriateness of the risk management measures in the SDS, communicate such information to the supplier (Art. 34 REACH);
 - Keep records of plausibility checks performed, their outcomes, and any resultant actions;
 - Ensure that each person with a role in managing received SDSs and/or conducting plausibility checks has the appropriate training and is competent to perform their duties.
 - If the SDS fails at any stage of the plausibility check, this may lead to further obligations under REACH, CLP, or other legislation.
- The Guidance provides, with several examples, on the compliance actions that are required by a recipient of an extended safety data sheet, i.e. an SDS with attached exposure scenario(s) for substances or “safe use mixtures information” for complex mixtures.



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LEGAL BACKGROUND

Why is plausibility check of SDS required?

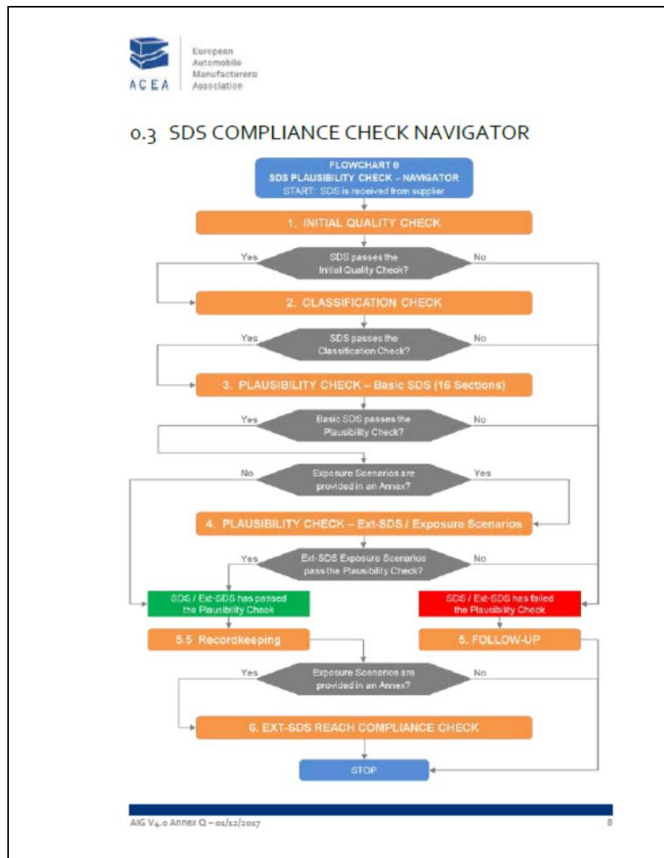
Beneath other arguments the following is the most important one:

“It should be remembered that compliance with the direct requirements of REACH and other relevant legislation should be seen as a minimum for overall legal compliance.

Under civil law, each employer also has a so-called “duty of care” to its employees, and in order to meet that duty of care, the employer should do all that is reasonable and required to protect employees’ health and safety and the environment. If harm occurs as a result of missing or incorrect SDS information, employers may be required to demonstrate they have indeed done all that is reasonable and required.”



SDS COMPLIANCE CHECK NAVIGATOR



1. INITIAL QUALITY CHECK

2. CLASSIFICATION CHECK

3. PLAUSIBILITY CHECK – Basic SDS (16 Sections)

4. PLAUSIBILITY CHECK – Ext-SDS / Exposure Scenarios

6. EXT-SDS REACH COMPLIANCE CHECK

Please download the guidance and follow the recommendations to higher the SDS quality in the supply chain!



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Thank you for
your attention

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