



Cefic UV/EB guidelines on the update and distribution of safety data sheets complying with REACH and CLP

Customer information

Background

The REACH regulation is triggering a lot of changes in the safety data sheets of UVEB products: classifications of the substances, uses advised against etc. The REACH regulation requires the SDS of the related products to be updated to reflect those changes but does not provide specific timelines. Therefore, companies are updating their SDS at their own pace, depending on the company policy, workload status and priorities. This results in the fact that customers buying the same product from different suppliers do not receive updated SDS from all suppliers at the same time, resulting in the situation that one supplier already has implemented the new information and another has not yet done so.

A change of classification and/or uses advised against or other relevant information is triggered by data generated for the specific substance and does not depend on the supplier. All suppliers are obliged to implement this new information without delay when it becomes available, even if they have not registered yet. However, some companies might overlook the new information until they actually prepare their registration dossier.

Implementing and communicating information which is relevant for the safe use of a UV/EB product along the supply chain is not only a question of legal obligation, it is also a question of responsible care. As soon as new information is available, via the SDS of a supplier or the SIEF communication of other registrants, all companies along the supply chain should implement this information to ensure a safe use of UV/EB products no matter if there is a legal obligation to do so.

FAQ

1) Why do we have different classifications (and other information e.g. on uses advised against) for the same product coming from different suppliers?

Suppliers do not implement the new information at the same time, but within a certain time frame you will receive updated SDS reflecting the same information from all suppliers.

2) Why do not all suppliers update at the same time?

Reason 1: REACH does not mention a specific timeline for updating SDS but rather states that *“Suppliers shall update the safety data sheet without delay on the following occasions: (a) as soon as new information which may affect the risk management measures, or new information on hazards becomes available [...]”* (REACH article 31.9). This gives companies the flexibility to update their SDS depending on their policy,



workload status, and supply chain/logistics implications, but still in a reasonable timeframe.

Reason 2 (incorrect): Some companies may wrongly believe there is no requirement to update the SDS before they register a substance or fail to look at the new information provided by the SIEF until they register themselves. These companies might update their SDS several years after the new data became available.

3) What is the timeline we can expect all SDS to reflect the same information

CEFIC UV/EB members agreed to implement* relevant information in the SDS for substances within 6 months after the lead REACH dossier has been filed or updated. Related mixtures will then follow in a second step, no later than 1 year after the update of the REACH dossier.

* This Cefic UV/EB guideline is based on the DUCG (Downstream Users of Chemicals Coordination group) guidelines on the Revision Management of SDS for preparation/mixtures complying with REACH and CLP Regulations, of March 30th 2011.

[http://ducc.eu/documents/Revision%20Management%20of%20Safety%20data%20sheets%20for%20preparations-mixtures%20complying%20with%20REACH%20and%20CLP%20regulations%20\(30-03-11\).pdf](http://ducc.eu/documents/Revision%20Management%20of%20Safety%20data%20sheets%20for%20preparations-mixtures%20complying%20with%20REACH%20and%20CLP%20regulations%20(30-03-11).pdf)

4) Is the substance of another supplier safer when its SDS shows a less severe classification /restrictions ?

No. The new classification, information on safe uses or other information provided in the SDS is based on the properties of the substances and does not depend on the supplier.

In very rare occasions, the difference in classification may be driven by a difference in the impurity profile. However, in that case, the hazardous impurities must be disclosed in section 3 of the SDS so that you can understand what is causing this difference. The same is of course also true when 2 products have a different composition. This should be visible in section 3.

In case your alternative supplier reflects other information on his SDS, we strongly recommend to ask for an updated SDS and for explanation of the divergent information.

5) In case I receive SDS with different information, which one do I have to use for the classification of my products?

It is advised to check the substance information on ECHA website, in the section for registered substances (not on the C&L inventory)

- The “Classification and Labelling and PBT assessment” tab will show the latest classification agreed within the SIEF based on all data available.
- The “Manufacture, use and exposure” tab will show the uses advised against and registered uses.



<https://echa.europa.eu/information-on-chemicals/registered-substances>

Suppliers providing SDS with other information than the one of the registration dossier should be contacted to get an updated SDS.

6) Can I change supplier to avoid implementing the new information?

When new information is made available to you by (one of) your supplier(s), you must comply with it (within 1 year for information about uses and exposure, cf. Articles 37 and 39) and update your own SDS without delay. Ignoring this information and changing supplier is not compliant with REACH article 31.9, not responsible for your employees and customers and a very short-term “solution” since the other suppliers will also update their SDS.

7) What is the timeline for updating my SDS with the new information received from my supplier(s)

We recommend to follow the DUCG (Downstream Users of Chemicals Coordination group) guidelines on the Revision Management of SDS for preparation/mixtures complying with REACH and CLP Regulations, of March 30th 2011.

[http://ducc.eu/documents/Revision%20Management%20of%20Safety%20data%20sheets%20for%20preparations-mixtures%20complying%20with%20REACH%20and%20CLP%20regulations%20\(30-03-11\).pdf](http://ducc.eu/documents/Revision%20Management%20of%20Safety%20data%20sheets%20for%20preparations-mixtures%20complying%20with%20REACH%20and%20CLP%20regulations%20(30-03-11).pdf)

8) Where can I get more information on the classification and other information related to the specific substance?

- ECHA webpage provides all relevant information on classification of substances. Go to:
<https://echa.europa.eu/web/guest/home>
enter the CAS number and you are referred to a page including all relevant information, giving also access to the public REACH registration dossier data. Use preferably the data of the REACH registration dossier rather than the data of the C&L inventory as these appear to be of a lower quality.
- Ask your supplier
- Refer to CEFIC UV/EB classification & labelling guide