



European
Automobile
Manufacturers
Association



JOINT INDUSTRY STATEMENT ON SAFETY DATA SHEETS QUALITY

Brussels, 15th December 2015

The undersigned organisations represent major end-users industries of chemical substances and mixtures. The quality of the safety data sheets (SDS) of the substances and mixtures supplied to us is crucial.

Under the framework legislation on chemicals (REACH), the Regulation on the classification, labelling and packaging of substances and mixtures (CLP), and other related legislation end-user companies typically have several roles and take on multiple responsibilities that rely on the accuracy of their suppliers' SDSs.

These include:

- Provision of relevant chemical safety information to employees;
- Workplace and environmental risk assessments;
- Provision of SDSs for after-sales products.

To fulfill these duties in practice good SDS quality and a plausibility check of each incoming SDS are required, especially relating to the classification of individual substances and overall mixtures.

THE IMPORTANCE OF GOOD QUALITY SAFETY DATA SHEETS FOR END-USER INDUSTRIES

The experience gained by end-user industry have evidenced that many SDSs have inconsistencies in the SDS classification when compared with existing REACH registration dossiers and CLP notifications, and other sections of the SDS itself.

Such errors, especially at the start of the supply chain, are likely to be carried through to the end-user, either directly, or as the result of calculations on formulations.

Quality issues in SDS can lead to risk to human health and to the environment which could lead to legal penalties and loss of company reputation. To reduce this, companies must undertake burdensome checks and engagement with suppliers.

A clear definition of the obligations on SDS recipients at all steps of the supply chain regarding plausibility checks is missing. As a consequence, the correctness of SDSs is interpreted differently along the supply chain and one and the same SDS is being considered correct by one company, whereas it is rejected by another. This finally may lead to significant variations in workers' and environmental protection.

FACTORS AFFECTING SAFETY DATA SHEETS QUALITY

There are several possible reasons for poor SDS data quality:

Supplier-related, due to insufficient...

- Knowledge of the composition
- Expertise in REACH & CLP
- Substance software systems
- Staff resources

Authority-related, due to insufficient...

- Quality checks on REACH registration dossiers
- Cross checks on conflicting dossiers
- Enforcement of CLP / REACH consistency
- Support for downstream/end users to discuss classifications

PROPOSALS TO ENHANCE SAFETY DATA SHEETS QUALITY

In order to improve the current situation, the undersigned organisations wish to open discussions with the chemical industry, importers, distributors and formulators and with the European Commission, ECHA and the national enforcement authorities.

The discussions should focus on the possible solutions below:

- Identify practical ways for the chemical industry to ensure SDS data quality along the supply chain, in the recipient's EU language to ensure understanding;
- Offer a European substance data base with validated acute (eco) toxicity data, for calculation of acute toxicity estimates for mixtures;
- Review REACH dossiers and check SDS quality, applying correct/consistent Classification & Labeling. In addition, ECHA could provide a tool to check correctness of SDS information;
- Develop certification criteria for SDS creation software to ensure that minimum requirements are fulfilled;
- Ease the checking of SDS correctness: one particular possibility could be the use of electronic formats like SDScomXML which may facilitate the use of SDS checking software;
- Promote training for employees working with SDSs;
- Develop an ECHA Guidance of incoming SDS plausibility checks for Downstream Users which includes also explanation on what is to be checked.

The European Automobile Manufacturers' Association (ACEA) represents the fifteen Europe-based car, van, truck and bus makers: BMW Group, Daimler, DAF, Fiat Chrysler Automobiles, Ford of Europe, Opel Group, Hyundai Motor Europe, Iveco, Jaguar Land Rover, PSA Peugeot Citroën, Renault, Toyota Motor Europe, Volkswagen Group, Volvo Cars and Volvo Group.

The AeroSpace and Defence Industries Association of Europe (ASD) represents the aeronautics, space, defence and security industries in Europe in all matters of common interest with the objective of promoting and supporting the competitive development of the sector. ASD's membership is composed of 15 major European aerospace and defence companies and 26 member associations in 19 countries. In 2014 over 3000 aeronautics, space and defence companies in these countries employed more than 795,000 people and generated a turnover of €199.4 billion.

Orgalime, the European Engineering Industries Association, speaks for 42 trade federations representing the mechanical, electrical, electronic, metalworking & metal articles industries of 24 European countries. The industry employs some 10.3 million people in the EU and in 2014 accounted for more than €1,800 billion of annual output. The industry accounts for over a quarter of manufacturing output and a third of the manufactured exports of the European Union.