

Best Practices

ORGANISATION OF SENDING SAFETY DATA SHEET UPDATES

Purpose of the document:

REACH does not stipulate how and when to send out minor updates of the safety data sheet. This paper intends to list some best practices how to organise and send minor updated safety data sheets out.

Background

REACH Article 31.9 requires suppliers to update the safety data sheet (SDS) without delay (a) as soon as new information which may affect the risk management measures, or new information on hazards becomes available; (b) once an authorisation has been granted or refused; (c) once a restriction has been imposed. For other (minor) updates, no timing has been specified.

The DUCC industry practical [Guidance for managing the revision of SDS for mixtures and communicating those under REACH and CLP](#) lists examples of minor updates and recommends a workable timing to update the safety data sheet.

The Cefic/DUCC/FECC paper [Options for electronic delivery of a Safety Data Sheet \(SDS\) and the Exposure Scenarios in Annex](#) addresses only the electronic ways an (extended) SDS (that has to be provided according to Article 31 of REACH) could be sent. The paper recommends the following regarding the sending of updates:

- The sending of revisions/updates of the SDS should follow the same rules, especially in the cases where an immediate action is needed (REACH Article 31.9).
- In some supply chains, recipients may also receive regularly a DVD/CD-ROM or equivalent with all or a relevant selection of the (updated) SDS.
- For SDS that have to be sent on request, once a Downstream User has requested them, the revisions should be sent to him without further request from his side if he has received the substance/mixture within the preceding 12 months.

However, questions remain on the frequency and the organisation of sending minor updates of SDS. Depending on the product range, organisation and size of the company, companies can send out the updated SDS manually or via an IT system and hence have different systems in place ranging from sending the minor update immediately to all customers of the past 12 months to sending grouped (minor) updates once a year.

This paper identifies a list of some current practices for sending minor updates of SDS to customers:

- A minor updated SDS does not have to be provided to the recipients of the past 12 months (as not fulfilling art 31.9). However, some companies may choose to do so.
- An SDS does not have to be provided with each order and delivery of the same product to an existing customer. However, companies can send a minor updated SDS together with the new order of and delivery to an existing customer. (cfr ECHA Guidance on the compilation of safety data sheets Version 3.1 November 2015: Once an SDS has been supplied for a first delivery of a substance or mixture to a particular recipient there is no need to supply a further copy of the SDS with subsequent deliveries to the same recipient unless the SDS is revised.)
- If you make SDSs available on your company website, make sure that the links previously sent to the customers are still working. The latest version of the SDS should be available on the website when a website link is used to make the SDS available to the customers. It depends on the organisation of the website if a new link to the updated SDS has to be provided to the customer to find this updated SDS. A company must make sure that, as long as the customer did not receive a new link to an updated SDS, the original link should still work and lead to the SDS.
- In some supply chains, all or a selection of customers may also receive regularly an electronic information carrier (DVD/CD-ROM/USB stick) or equivalent with all or a relevant selection of the (updated) SDS or hard-copies. The minor updated SDS can hence be grouped and included in this distribution scheme.

Reminder on sending updates related to the new format 830/2015:

If a mixture was not classified hazardous according to DPD but has become hazardous according to CLP, an SDS should be provided automatically to the recipients of the previous 12 months as their risk management measures may be affected (cfr REACH Article 36.9 a).

Please consult the paper on electronic delivery

Please consult the Cefic paper '[A new Safety Data Sheet format](#)' (31 July 2015).

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