



ČESKÁ INSPEKCE  
ŽIVOTNÍHO PROSTŘEDÍ

# Observations from inspections of (extended) Safety Data Sheets

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# eSDSs enforcement project

- REF5

- Project with operational phase in 2017
- Three clusters of inspected companies
  - Manufacturers, distributors+formulators, end users
- Extended safety data sheets – flow of information to end user
- Use of eSDS – RMM/OC
- Distributors have problems with integrating ES from different suppliers

# eSDSs enforcement project

- REF5

- 29 member states, 898 inspections (20 CZ), mostly manufacturers (NACE 10-33), 18% non-compliance, 1435 substances inspected (375 different, mostly NaOH, ethanol, sulphuric acid)
- Most common mistakes: language, CSA without ES, not the same use, keeping information



- eSDS very complex, difficult for DU to understand

## To ECHA

1. Information campaigns (guidance) and cooperation with IND to improve the use of ES
2. Campaigns on the importance of updating dossiers (and CSR)
3. Implement automatic validation of the content of CSR during CCH or other mechanism to follow-up the quality of the registrants CSR

## To Commission

1. Promote discussions (COM, ECHA, IND) to propose ways to improve dossier update [REACH Review Action 1 - *Encourage updating of registration dossiers*]
2. Clarification of the legal text to improve enforceability of some REACH provisions -> discuss with Forum
3. Prioritise REACH Review action 3(2) “Consider including minimum requirements for the ES for substances and mixtures in SDS and request ECHA to develop a methodology for SDS of mixtures”
4. Establish a binding format/content for ES (similar to SDS)

## To Commission

5. Close integration of REACH with other legislations (OSH, environment) is needed to attain REACH objectives
6. Support SMEs improve their CSRs

- **Forum:**
  - Repeat REF-5 in the future, focusing on the quality of the CSRs and ext. SDS for mixtures -> Proposal from Forum members for assessment by the WG Prioritisation of REFs
  - Continue designing projects attractive to others authorities

# SDS quality

- Quality of SDSs
  - In the long run average number of non-compliant SDSs is about 50%
  - Compliance  $\neq$  Usefulness of SDS
  - Czech project: most non-compliant sections of SDS: 1, 2, 3, 8, 13



# SDS quality

- Initiative to improve quality of SDSs
  - Forum working group analyzing SDSs to identify most common mistakes
  - Sections analysed 1, 2, 3, 8, 11, 12
  - Recommendations to SDSs compilers
    - Special recommendation to software companies

# Thank you for your attention!

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