



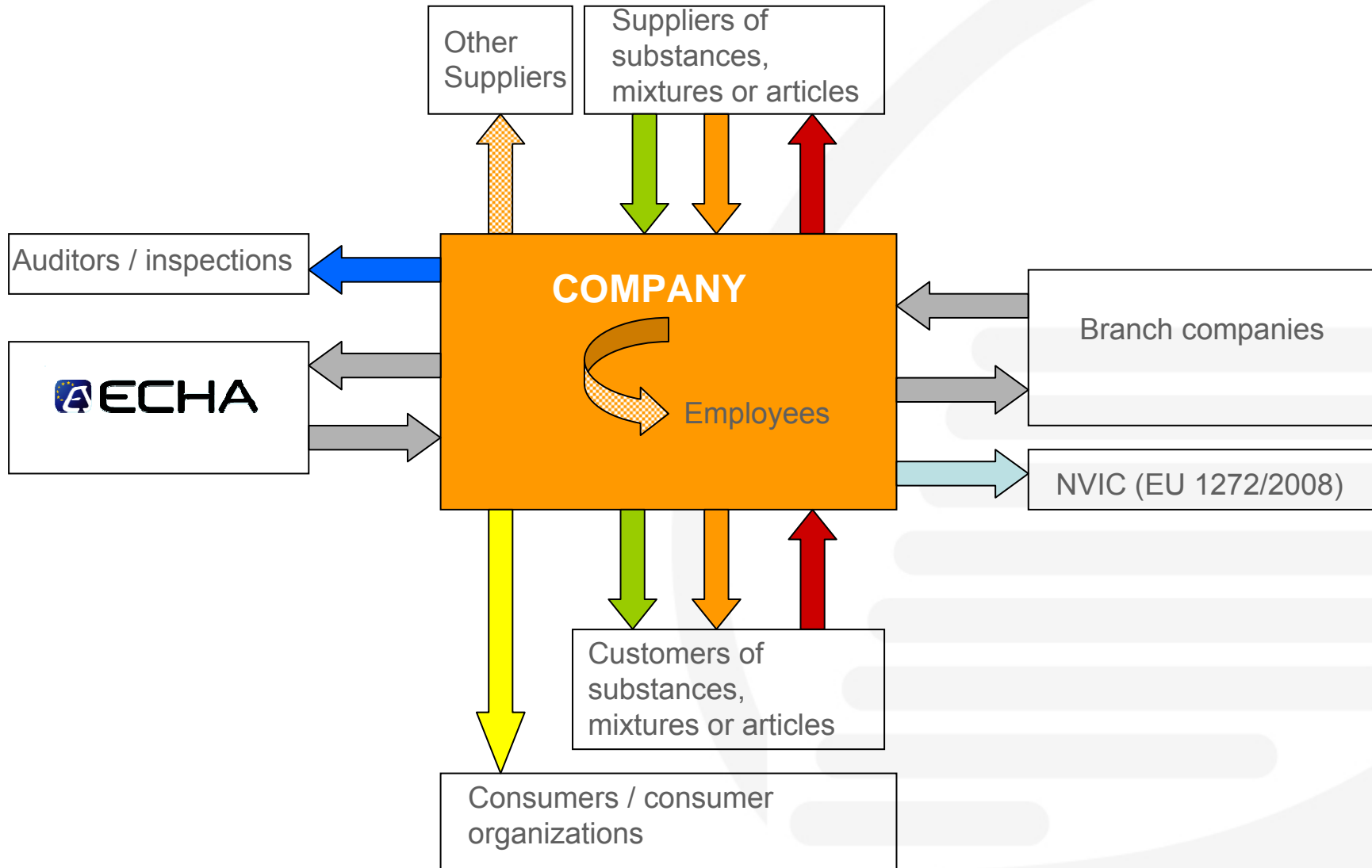
# REACH – special subject: communication between companies

**What are communication lines within REACH and linked regulation?**

Erik Geensen  
Quick-SDS  
May 14th 2009

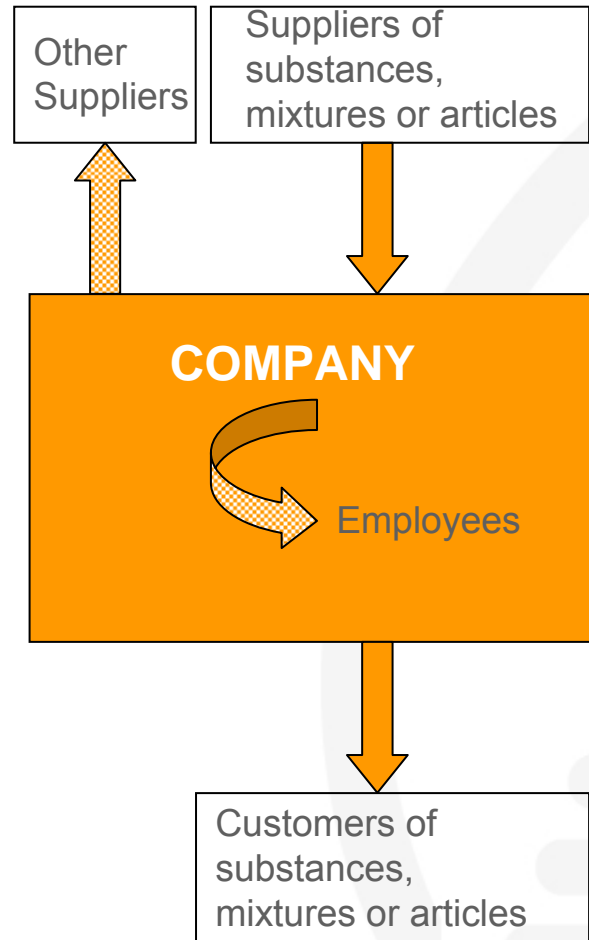


# Communication in and between companies in REACH



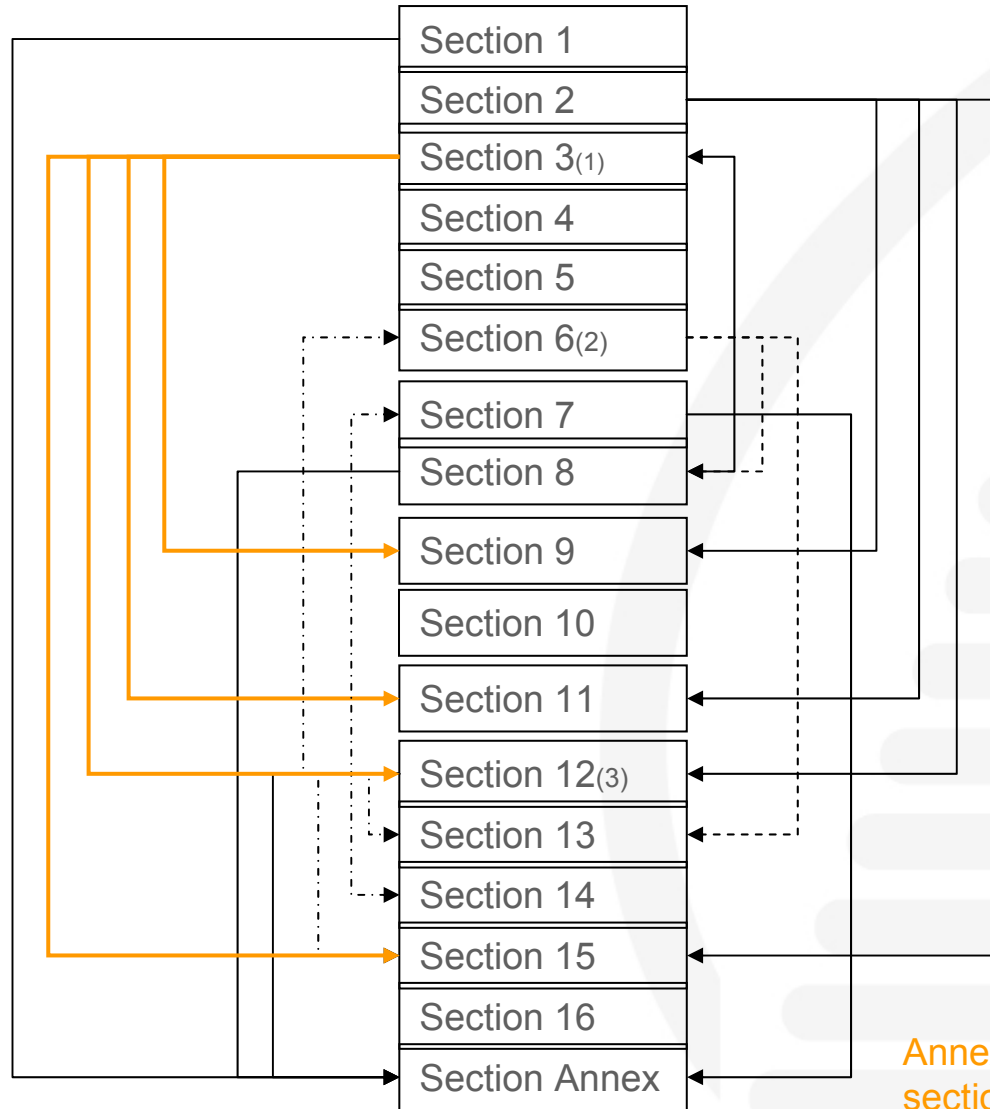


# Communication of SDS in the supply chain





# Main consistencies and relationships in SDS



(1) Section 3, 9, 11, 12 and 15 are included in the SDS Checker Diagnosis Report of Quick-SDS  
→

(2) Section 6 should be linked to sections 8 and 13 in case of necessity  
----->

(3) Sections 6, 7, 12, 13, 14, and 15 of the SDS should provide information to prevent environmental consequences  
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Annex is linked to sections 1, 7, 8 and 12



## REACH: regulatory SDS distribution

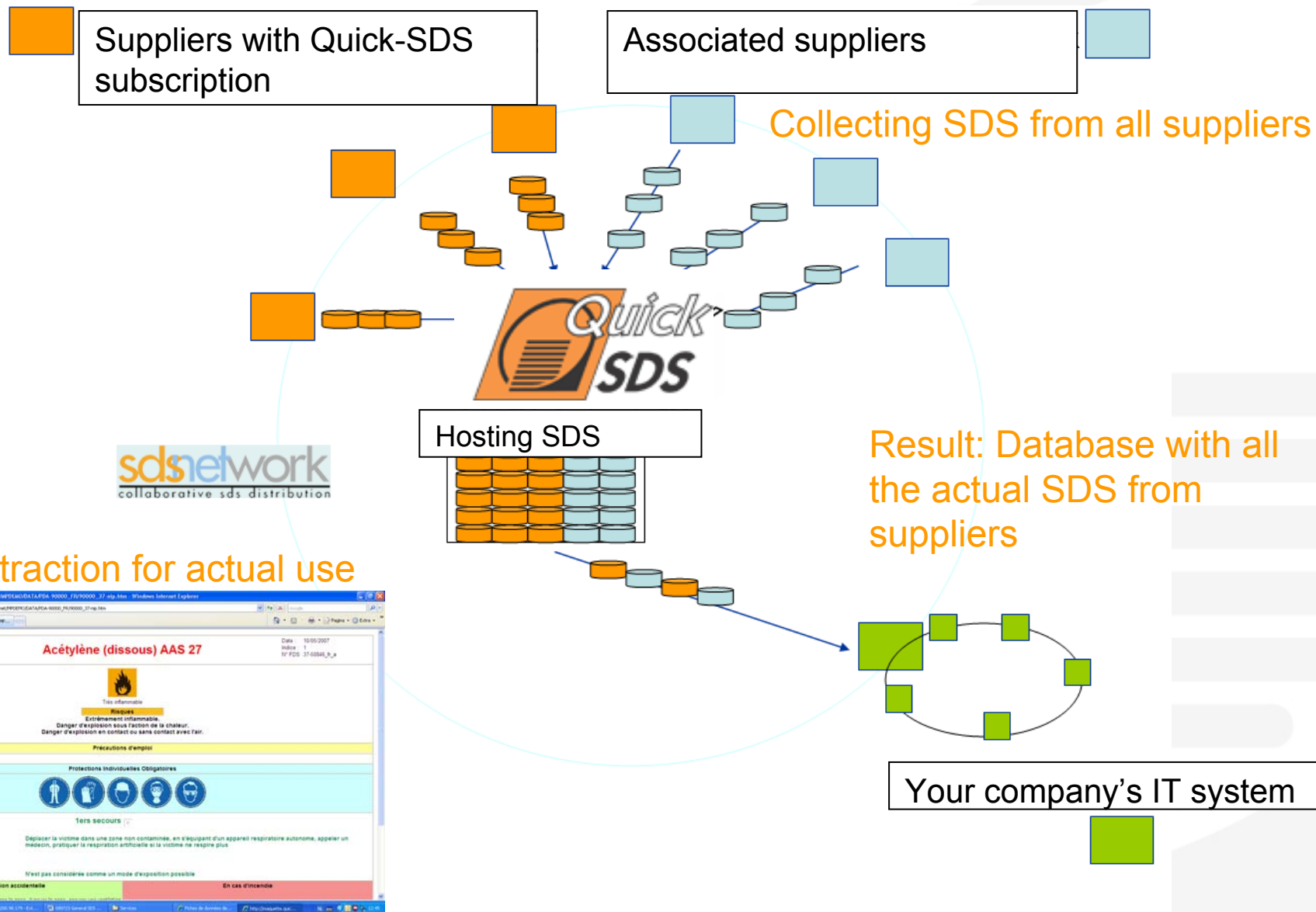
<i>Regulation EG 1907/2006</i>	<i>Description</i>	<i>Solution in Quick-SDS</i>
Article 31 – 1	Providing SDS of dangerous substances to customer (proactive)	Sending SDS to customers on initiative of your company
Article 31 – 8	SDS can be provided electronically or on paper	Quick-SDS can provide SDS in different formats
Article 31 – 9	Updates of SDS must be provided to customers which ordered the substance in the last 12 months	‘Subscription’ of a customer to SDS during a period of e.g. 12 months via email alert
Article 35	SDS of substance is available for employees which are exposed to the substance	Access to Quick-SDS database for employees of your company
Article 36 – 1	Obligation to save information at least until 10 years after last delivery of the substance	Quick-SDS saves all information on SDS access: ‘to whom is what provided and when?’

REACH is not completely new: SDS distribution is applicable from 1967!!

Quick-SDS was developed long before REACH.

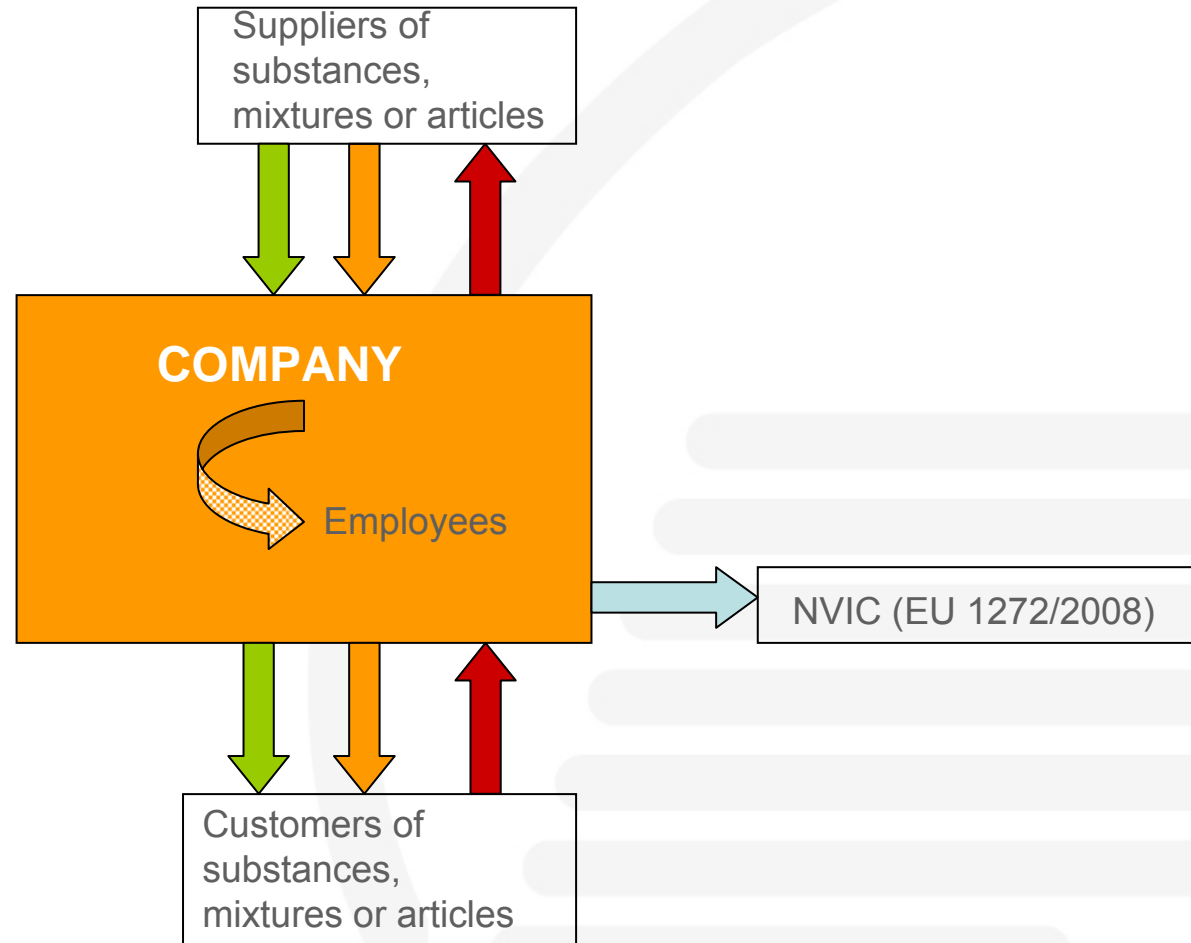


# For users of chemical substances: SDS Retriever

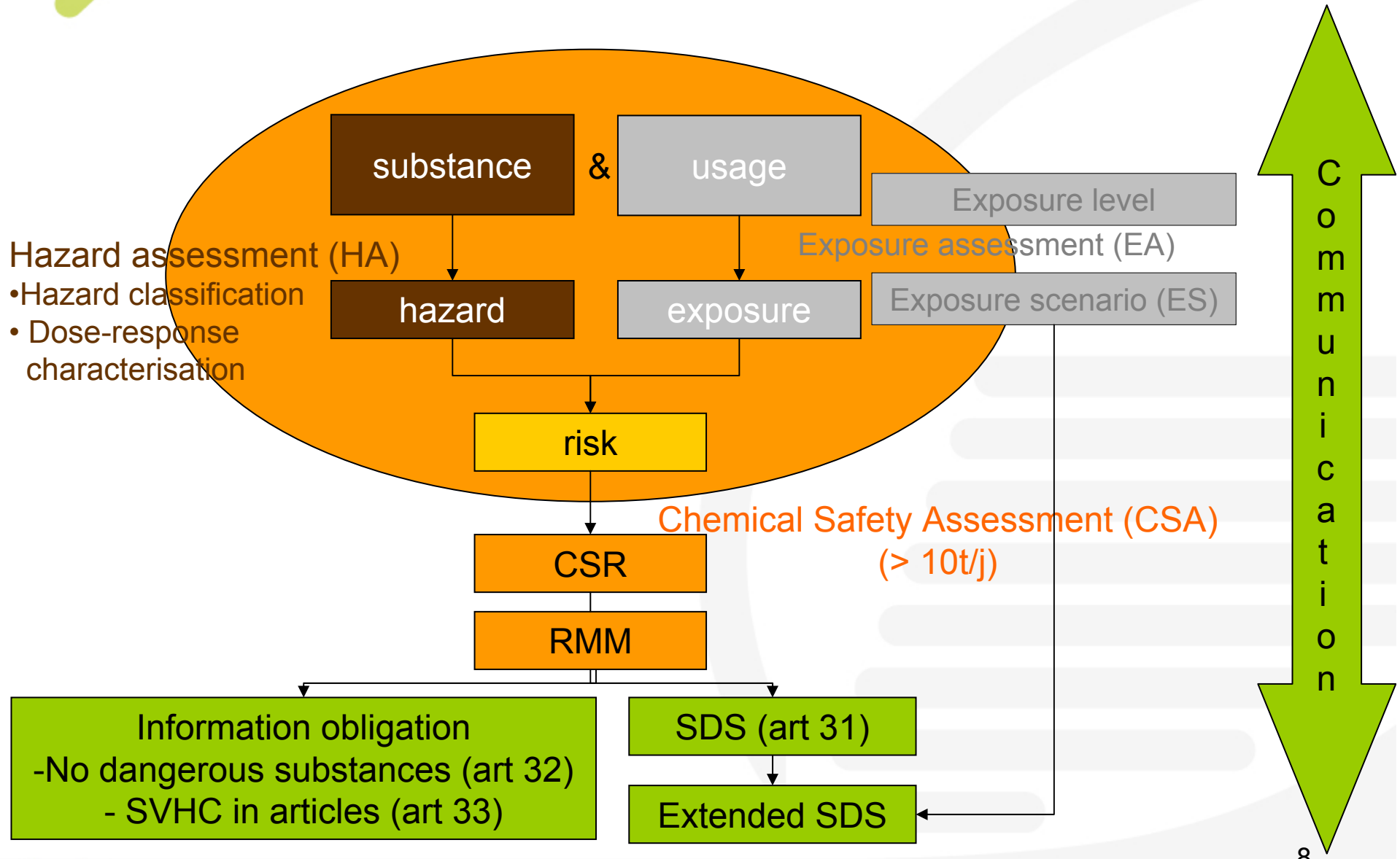




# NEW: Communication on usage of a substance



# → REACH new Communication







## Information in supply chain from downstream users

(\*) Apply information in use within 12 months after registration

(\*\*) Apply information in use within 6 months after registration

<b>Role</b>	<b>Item</b>	<b>Distribution</b>	<b>Information</b>	<b>Remarks</b>
User	Substance or preparation	<b>Obligatory:</b> provide information to employee	<b>SDS</b> standard from supplier or <b>subtracted</b> information and self created exposure scenario's(*)	Annex with CSR
User	Substance or preparation	In case of <b>necessity</b> to employee	<b>SDS</b> standard from supplier or <b>subtracted</b> information and self created exposure scenario's(*)	Annex with CSR
User(*)	Any product with SDS obligation	<b>Obligatory</b> , to supplier (producer or distributor)	1) New information on hazardous property 2) information on safety measures from SDS 3) New use one month before applying (*)	
User(*)	Any information for registration	<b>Potential</b> help on registration to supplier	1) Uses 2) Safety measures	12 months
User (**)	Substances with registration obligation on use	<b>Obligatory</b> to ECHA	CSR including exposure scenario's	6 months

# → Registration of substances: obligation to work together





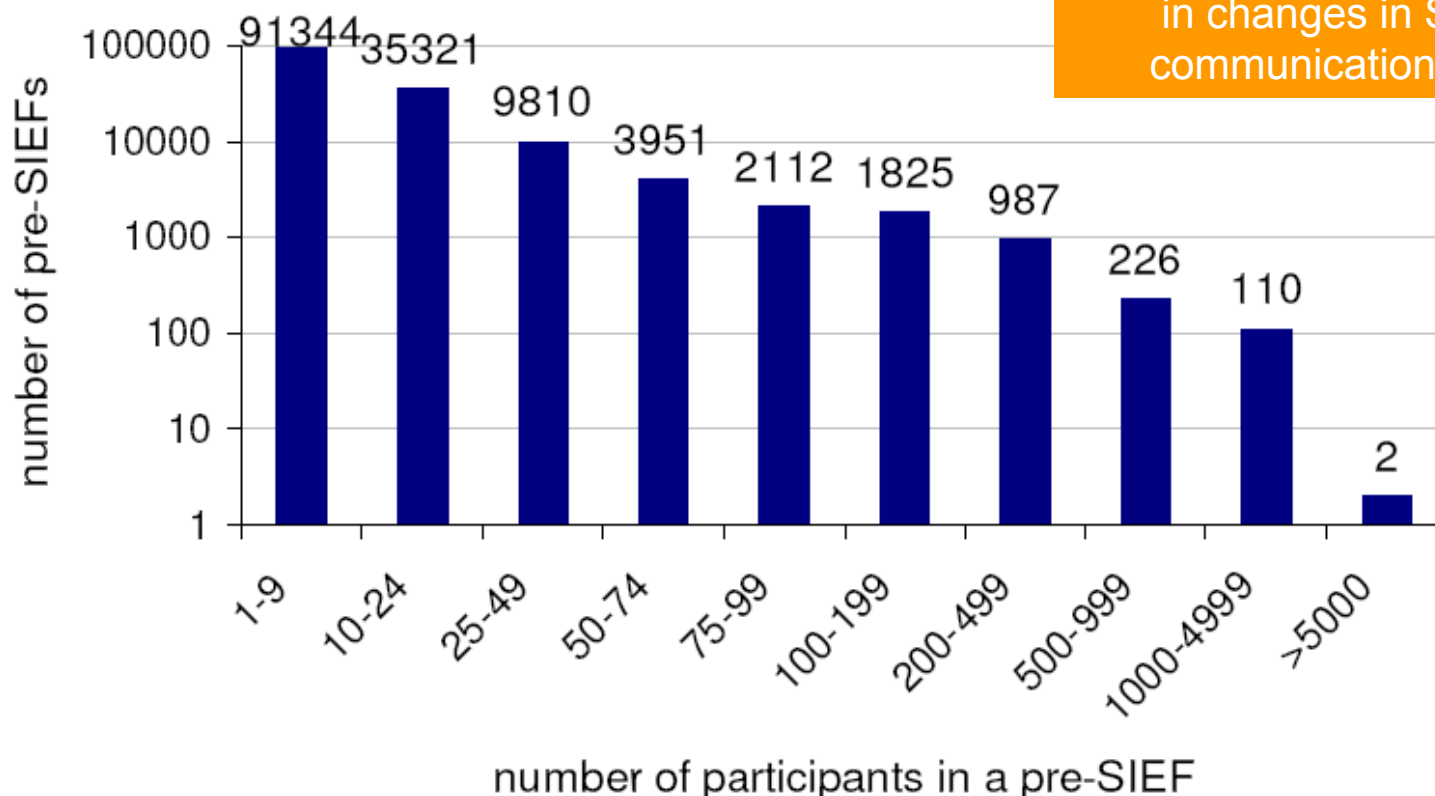
## Registration of substances: beyond expectations

More than 150.000 different substances (screening on synonyms, articles, mixtures)  
More than 2,6 million preregistrations and more than 71.000 companies, which subscribed

### Pre-registration experiences



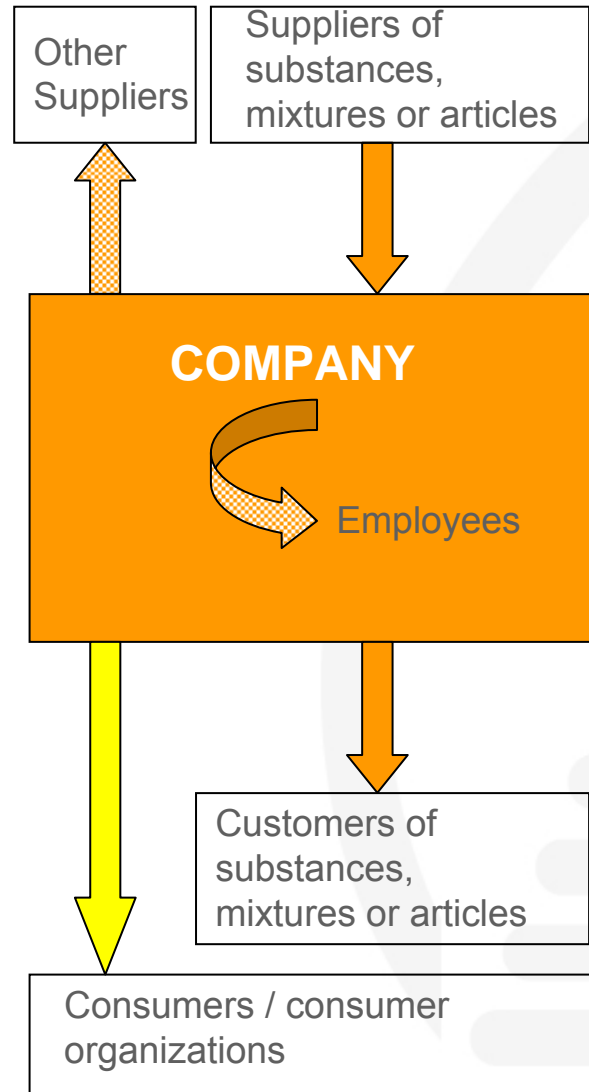
- pre-SIEF size



Registration of substances will effect in changes in SDS: additional communication in supply chain



# Communication due to EU implementation GHS: CLP





## CLP (EU-GHS) timing and rules



### ▶ September 2008

- Agreement on proposal

### ▶ End of 2008

- Regulation accepted by EU Parliament and Council of Europe

### ▶ Start January 20th 2009

- Regulation is valid
- Start change over period for substances and preparations (article 58)
- Labeling en packaging of substances and preparations according [Wms](#) obligatory
- classification, labeling en packaging of substances and preparations according EU-GHS admitted

### ▶ December 1st 2010

- classification, labeling en packaging of substances and preparations according EU-GHS obligatory (article 58.3)
- classification, labeling en packaging of substances and preparations according [Wms](#) admitted

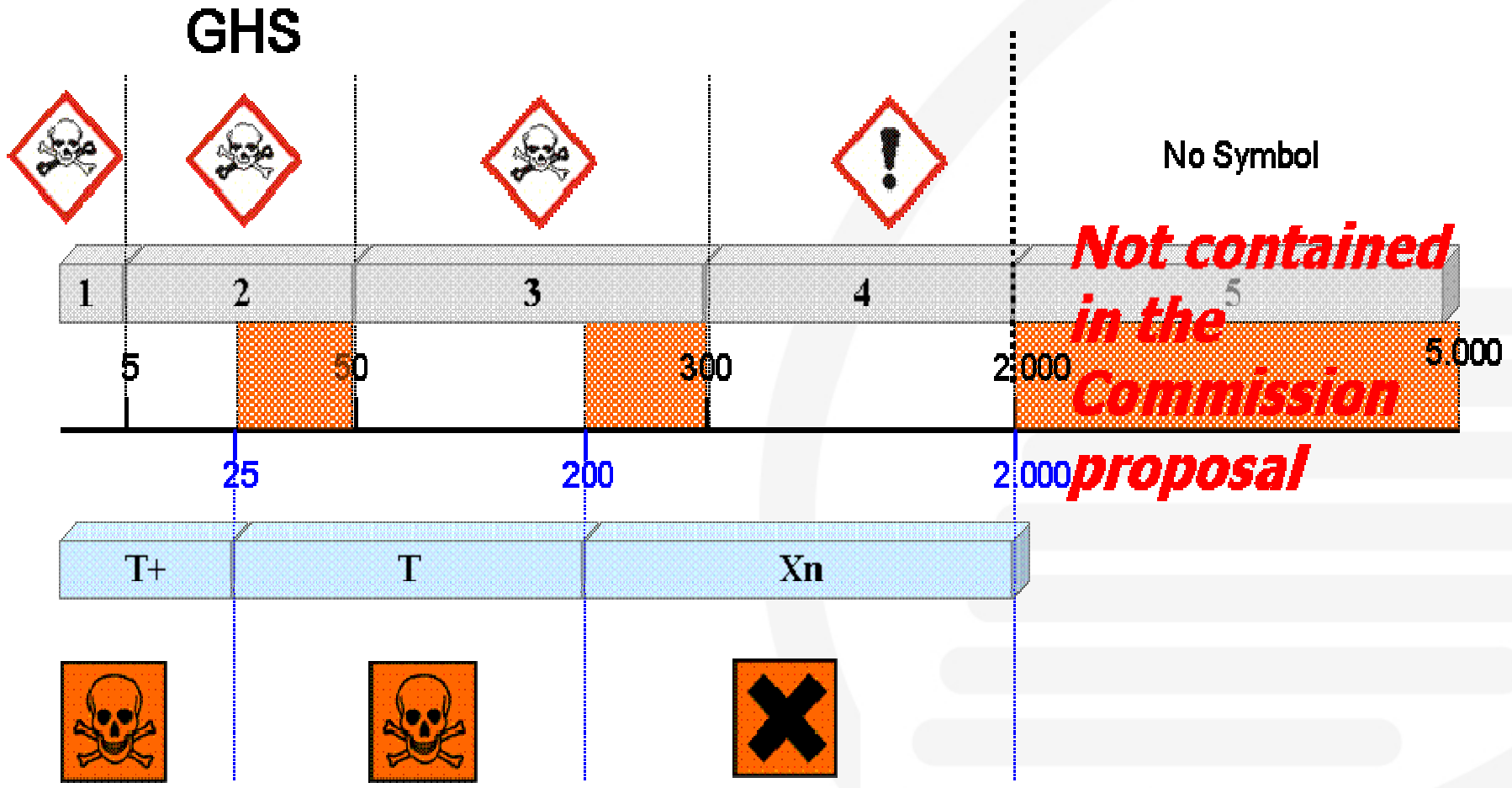
### ▶ June 1st 2015

- classification, labeling en packaging of substances and preparations according EU-GHS obligatory
- Deletion of old regulation

CLP will effect in changes in SDS:  
additional communication in supply chain

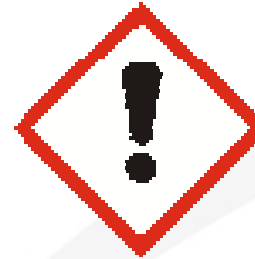
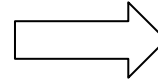


➔ Example: oral acute toxicities





# GHS in the world



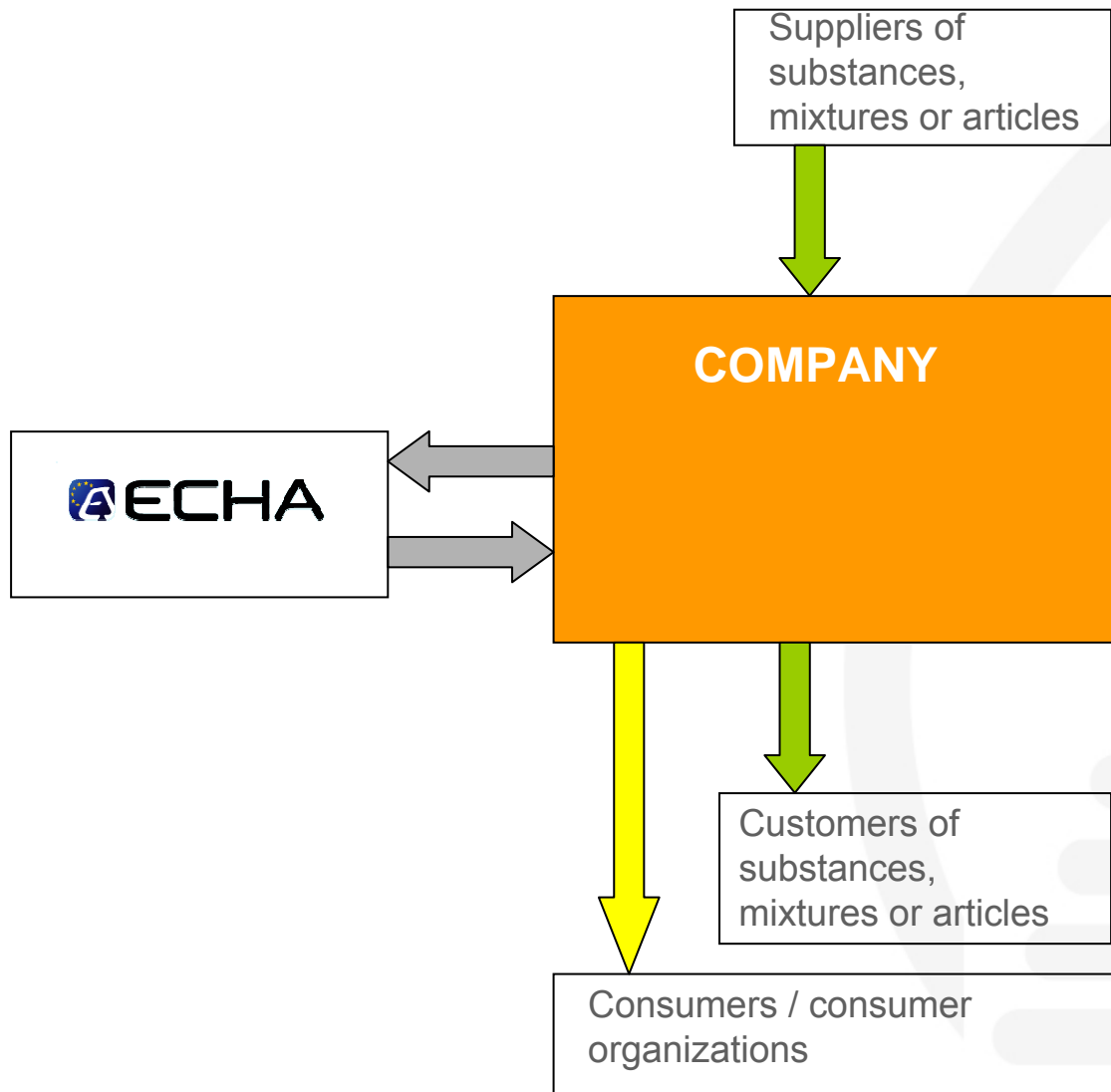
activities

preparation

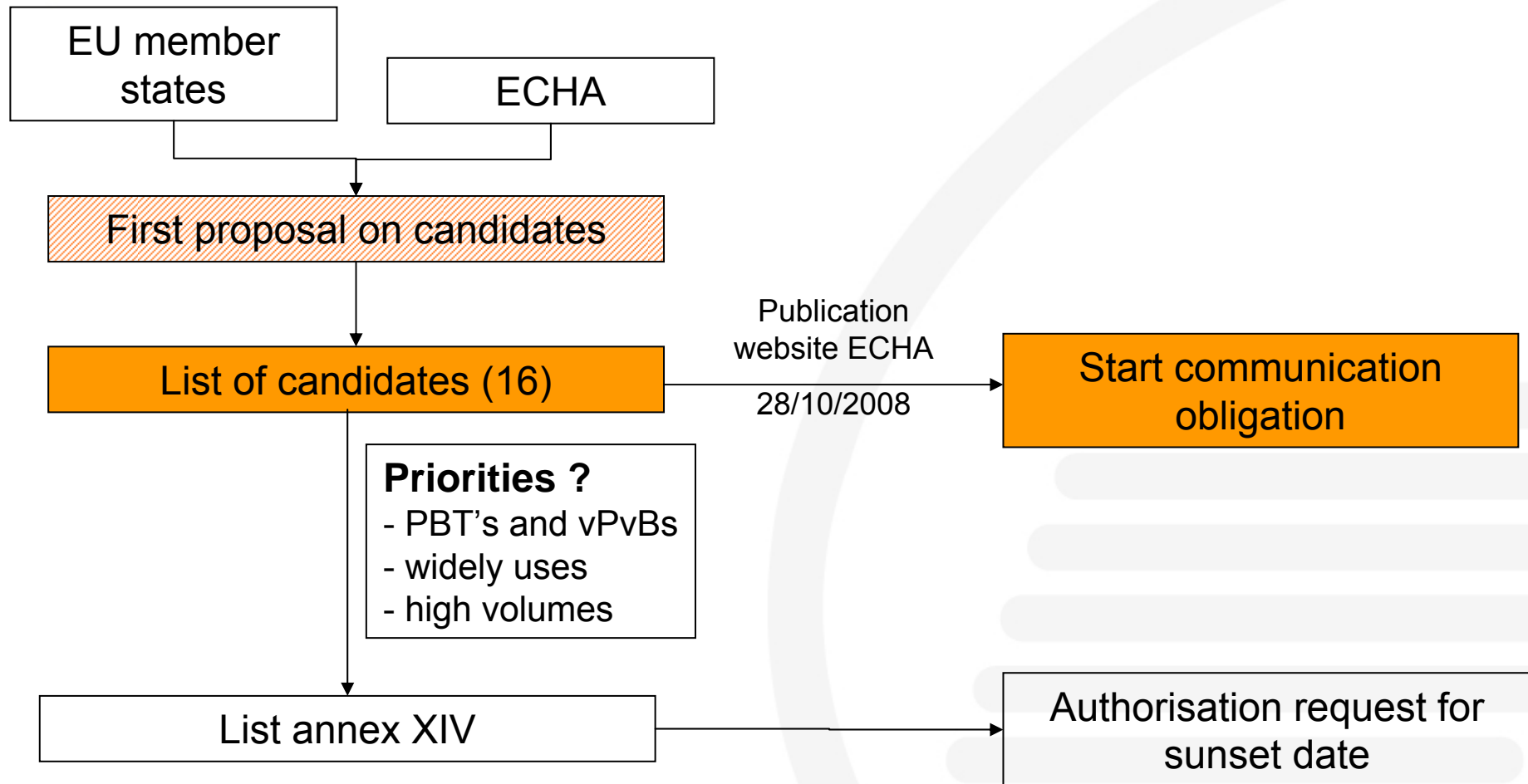
Implementation



# ➔ Reporting on SVHC and components



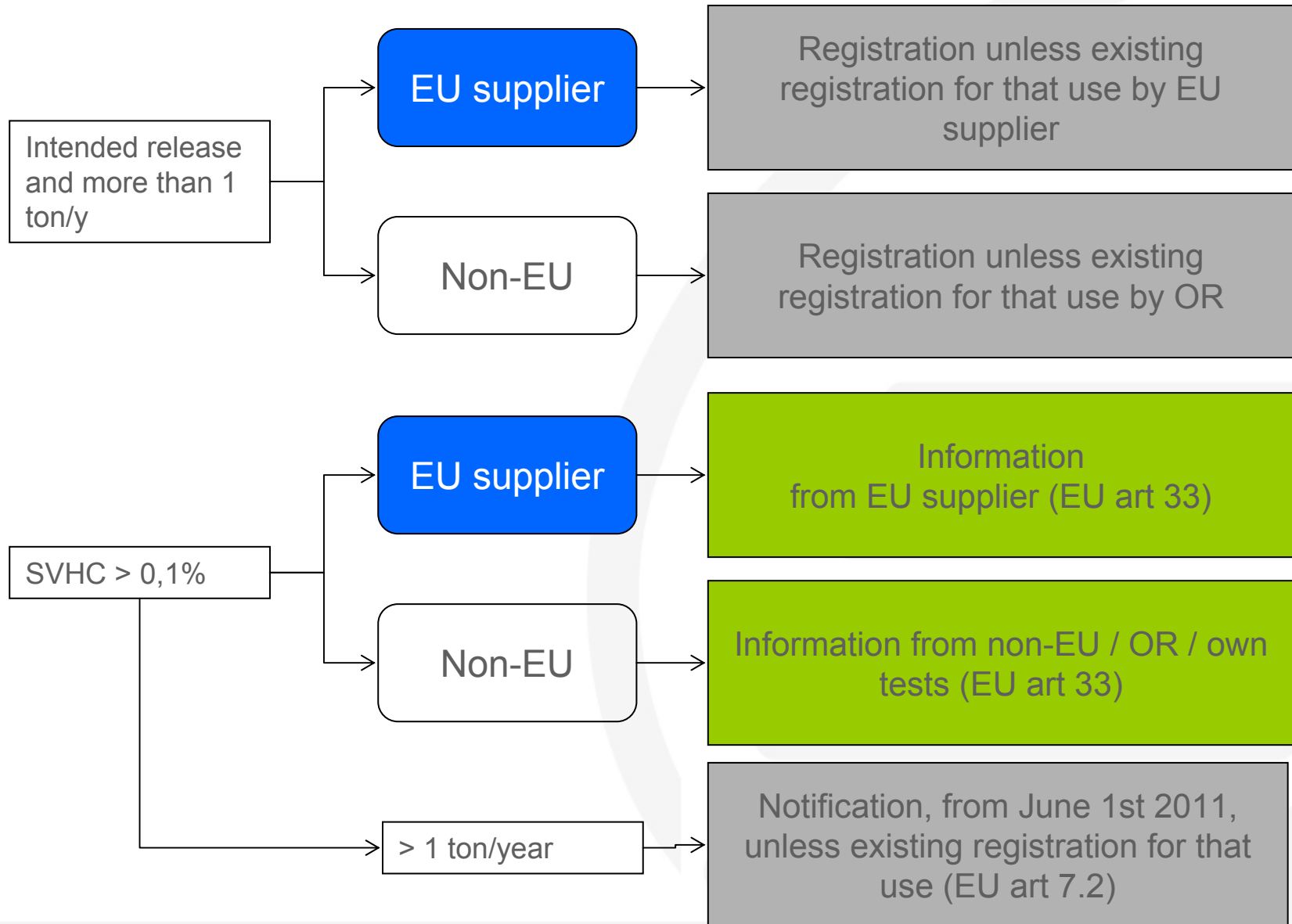
# ➔ Procedure identification SVHC



Procedure is on going process: new candidates are in progress (around 200 substances qualify according rumors)



# Reporting on SVHC: kind of substance and EU

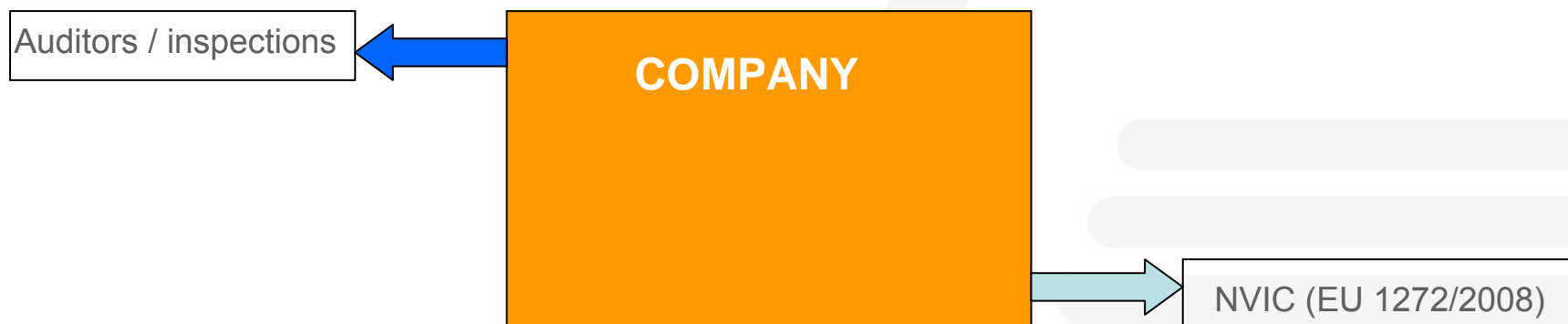


# → Reporting on SVHC and components

<b>Role</b>	<b>Item</b>	<b>Distribution</b>	<b>Information</b>	<b>Remarks</b>
Producer / Importer	Substances SVHC in Articles (Professional) with more than 0.1% weight	<b>Obligatory</b>	1) Name 2) Safe use	45 days
Producer / Importer	Consumer product including substance or preparation	<b>On demand</b> to distributor or customer	1) Name 2) Safe use	45 days
Producer / Importer	Any substance or preparation	<b>Obligatory</b> , to supplier (producer or distributor)	1) New information on hazardous property 2) information on safety measures from SDS	
User	Consumer product including dangerous substance or preparation	<b>On demand</b> to distributor, customer or <b>consumer</b>	1) Name 2) Safe use	45 days

Some companies have other regulation as well: detergents, reporting to consumers on ingredients

# ➔ Communication to NVIC and audits / inspections





# Reporting for medical usage: NVIC

## NVIC

- ▶ EU regulation 1272/2008 is defining national institute for information on dangerous substances for professional medical use
- ▶ Focus on prevention and cure
- ▶ In the Netherlands NVIC ('Nationaal Vergiftigingen Informatie Centrum') is responsible for collecting data
- ▶ Companies have to report to NVIC
  - SDS
  - Additional information such as specification of ingredients / components

## INSPECTIONS

- ▶ In the Netherlands different inspections are working together: VROM inspection, Labour inspection ('Arbeids inspectie') and Food / goods inspection ('Voedsel en Waren autoriteit') organize joint inspections

<http://www.rivm.nl/milieuportaal/images/Informatieblad%20Product%20Notificatie.pdf>



# Communication in and between companies in REACH

