

Addendum to CHCS SDS User Guide

Rev 4 - August 2009

Note: This is a cumulative revision and replaces all previous.

Introduction

This Addendum provides essential updates to the content of the printed Chemical Hazards Communication Society (CHCS) publication “Safety Data Sheets - A User Guide” 1st Edition.

These updates are those applicable as to August 2009. Please ensure you keep abreast of any future changes

The updates deal only with essential matters that users of Safety Data Sheets (SDSs) may need to be aware of.

Updates

General Issues

From 1 June 2007 the directly acting European Community *REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC* became the controlling Regulation applicable to the supply, formatting and content of SDSs.

REACH SDS provisions were amended on 20 January 2009 by the *Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures, and amending Directive 67/548/EEC and Regulation (EC) No 1907/2006* (in short CLP), and with further changes scheduled for compliance by, at the latest, 1.12.2010 and 1.6.2015.

Notes:

1. One of the changes introduced by CLP into REACH was the change from use of “preparation” or “preparations” to “mixture” or “mixtures”. Accordingly read “mixture” or “mixtures” whenever “preparation” or “preparations” is mentioned in relation to REACH.

2. Also CLP replaced Annex I to the DSD, and thus the L142 Approved Supply List (ASL), by a new listing of harmonised classifications. This listing is now found in Table 3.2 of Annex VI of the CLP (albeit with some ‘corrections’. Accordingly replace all references throughout the text to Approved Supply List (ASL) by “Table 3.2” (of Annex VI of CLP).

REACH Regulation Article 31 specifies the headings of SDSs. However whilst using the same mandated heading texts as used in the CHCS Guide it does list this in a different order, with the second and third headings transposed.

Thus users will now see SDSs with the second numbered as “Section 2”, but with the heading text, and content, stating “Hazards” and the third numbered as “Section 3” but with the heading text and content relating to Composition/information on ingredients. Technically REACH does not mandate the order, but most now follow the REACH order.

When using the Guide please be aware of that the Sections 2 and 3 of the SDS may probably be transposed in many SDSs compared to this guide.

From 6th April 2009 the Chemical (Hazard Information and Packaging for Supply) Regulations 2009 (SI 2009 No 716) (CHIP4) simply make reference to the SDS requirements of the REACH Regulation.

REACH Regulation Annex II gives EC Guidance on the compilation of SDSs. References to the Health and Safety Executive’s *L130 Approved Code of Practice: Safety Data Sheets for substances and preparations dangerous for supply* in this guide should be generally considered to be references to the REACH Annex II guidance.

The REACH Regulation, in corrected form, is published in the EC Official Journal (OJ) and can be accessed free of charge on the Internet at <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2007:136:0003:0280:EN:PDF>. Note however that there are subsequent amendments – see http://ec.europa.eu/environment/chemicals/reach/legislation_en.htm for a listing of these.

The CLP Regulation is available at <http://eur-lex.europa.eu/JOHtml.do?uri=OJ:L:2008:353:SOM:EN:HTML>

REACH has the same force of law as if it were UK Regulations (Statutory Instruments) in consequence of the REACH Enforcement Regulations 2008 (SI 2008 No 2852) which can be accessed free of charge at http://www.opsi.gov.uk/si/si2008/pdf/uksi_20082852_en.pdf

Specific page updates follow:-

Page /Section	Update
2 / Further Reading and Regulations	From 1 June 2007 the CHIP Regulations SDS requirements and “Complete idiot’s Guide will cease to be applicable. Consult the REACH Regulation – see above under general issues.
3 / Section 1	The SDS should also show the intended or recommended use , as far as is known
4 / Section 1	The email address for contacting the SDS compiler should also be included.
5 / Section 2	Note that from June 2007 this Section of the SDS seen may be headed “Hazards” and include such hazards information as Section 2. In which case the information in Section 2 of this guide will apply to Section 3 of that SDS (which should then be headed “Composition/ Information on Ingredients”
6 / Section 2	Replace in further reading “Approved Supply List (ASL)” by “Table 3.2 of Annex VI of CLP Regulation”
7/ Section 3	Replace references to the “Approved Supply List (ASL)” by “Table 3.2 of Annex VI of CLP Regulation”
7 / Section 3	Note that from June 2007 this Section of the SDS may be headed “Composition/ Information on Ingredients” and include such information in Section 3. In which case the information in Section 3 if this guide will apply to Section 2 of that SDS
7/ Section 3	From 2002 the SDS should be clearly stating in the section titled “Hazards” the classification of the substance or the preparation as determined by the classification provisions of Regulation 4 of the CHIP4 Regulations.
8 / Section 3	In Further reading replace current by the “The Approved Classification and Labelling Guide (sixth edition)” available at http://www.hse.gov.uk/chip/classification.pdf
14 / Section 5	Fire Precautions (Workplace) Regulations 1997 (Statutory Instrument 1997 no 1840) has been replaced by the Regulatory Reform (Fire Safety) Order 2005 (SI 2005 No 1541) as amended by the The Regulatory Reform (Fire Safety) Subordinate Provisions Order 2006 (SI2006 No 484), which amended the introduction date from April 2006 to October 2006.
17 / Section 7	Fire Precautions (Workplace) Regulations 1997 (Statutory Instrument 1997 no 1840) has been replaced by the Regulatory Reform (Fire Safety) Order 2005 (SI 2005 No 1541) as amended by the The Regulatory Reform (Fire Safety) Subordinate Provisions Order 2006 (SI2006 No 484), which amended the introduction date from April 2006 to October 2006.
19 / Section 8	From 2002 the SDS should be giving quite specific advice on personal protective equipment. For instance the specific type of respiratory protection applicable and the specific filter medium if applicable. E.g. statements such as just “Suitable respiratory protective equipment” is no longer adequate. Note however that this may be difficult in cases such as protective gloves, and will still require the user to assess the risks and make appropriate choices

21 / Section 8 Further reading and Regulations	<p>The general COSHH ACOP is no longer valid. See http://www.hse.gov.uk/coshh/ for further information.</p> <p>The first three paragraphs should be replaced by: Section 8 may provide information on the occupational exposure limits used in the UK. The Workplace Exposure Limit (WEL) will be associated with the product if it has a mist, vapour or particulate evolution that is hazardous to health, or if a dust may be generated in use. Exposure to such substances should be kept as low as is reasonably practicable. What is considered reasonably practicable will depend upon the hazards of the chemical, the time, cost and effort involved in setting up additional controls and the level of overexposure. In addition it may be necessary to undertake an employee-monitoring programme.</p>
32 / Further reading and Regulations	For the “Special Waste Regulations” read the “Hazardous Waste Regulations”
34 / Further reading and Regulations	<p>For the “Special Waste Regulations” read the “Hazardous Waste Regulations” For “Special Waste” read “Hazardous Waste” Delete Technical Guidance Note WM1 Add “ Technical Guidance Note WM 2 Hazardous waste Interpretation of the definition and classification of hazardous waste” See http://publications.environment-agency.gov.uk/pdf/GEHO0603BIRB-e-e.pdf</p>
37 /Section 14 Transport Category	The Transport Category is now used in ADR (and thus also in the UK)
37 /Section 14 ADR/Item No	<p>This concept has been replaced by an ADR/RID classification code system which identified a group characteristic within a class.</p> <p>E.g. in Class 3 Classification Code “FTC” refers to flammable liquids with toxic and corrosive subsidiary hazards</p>
37/ EmS and MFAG	<p>EmS Now consists of two codes per dangerous good, These cover separately ‘fire’ (coded F- “a letter”)and ‘spillage’ (coded S-“ a letter”) issues.</p> <p>The MFAG number should no longer be listed as in general the MFAG gives guidance based on the symptoms being shown by the casualty, and not on the basis of the substance to which the person may have been exposed.</p> <p>Listing of MFAG numbers is now indicative of an out of date SDS</p>
38/ Further reading and Regulations	<p>The applicable British carriage of dangerous goods by road regulations are, replacing all those listed, now just:-</p> <ul style="list-style-type: none"> • Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (SI 2009 No 1348) (commonly known as CDG2009), with associated approved document the "Dangerous Goods: Approved Derogations and Transitional Provisions" (ADTP) which is available on the DfT website at http://www.dft.gov.uk/pgr/freight/dgt1/

41 / Further reading and Regulation	EH40 is not now republished each year. Approved Supply List (ASL) is replaced by Table 3.2 (of Annex VI of CLP) See HSE website at http://www.hse.gov.uk/coshh/index.htm for the current list
47 et seq / Abbreviations	Add where applicable: <ol style="list-style-type: none"> 1. CLP - Regulation (EC) No 1272/2008 on Classification, Labelling and Packaging of substances and mixtures, and amending Directive 67/548/EEC and Regulation (EC) No 1907/2006 2. GHS - Globally Harmonised System of Classification and Labelling of Chemicals 3. REACH - Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)
65	HSE Info line is now 0845 345 0055. The address is no longer correct. See http://www.hse.gov.uk
66	NCEC address is now: <p style="text-align: center;">The NCEC, B329 Harwell, DIDCOT, Oxfordshire, OX11 0QJ, United Kingdom</p> <p style="text-align: center;">Tel (sales and enquiries): +44 (0) 870 190 6621 Fax: +44 (0) 870 190 6614 Email: ncec@aeat.com</p> <p>Delete reference to ASL being available from NCEC</p>
66	SIs are now published by Office of Public Sector Information (OPSI) see http://www.opsi.gov.uk/stat.htm
67 Regulations	Replace the whole list by the following <ul style="list-style-type: none"> ● Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (SI 2009 No1348) (commonly known as CDG2009) , with associated approved document the "Dangerous Goods: Approved Derogations and Transitional Provisions" (ADTP) which is available on the DfT website at http://www.dft.gov.uk/pgr/freight/dgt1/ ● Chemical (Hazard Information and Packaging for Supply) Regulations 2009 (SI 2009 No 716) (CHIP4)

	<ul style="list-style-type: none"> • Control of Substances Hazardous to Health Regulations 2002 (COSHH) (SI 2002 No 2677) • Hazardous Waste (England and Wales) Regulations 2005 (SI No 894) (HWR) • The List of Wastes (England) Regulations 2005 (SI 895) (LoWR) • REACH Enforcement Regulations 2008 (SI 2008 No 2852) • Dangerous Substances and Explosive Atmospheres Regulations 2002 (SI2002 No 2776)
67 & 68 Approved Documents	<p>Replace whole list by the following:-</p> <p>“The Approved Classification and Labelling Guide (sixth edition)” available at http://www.hse.gov.uk/chip/classification.pdf EH40 As published (see website at http://www.hse.gov.uk/coshh/index.htm)</p>
68 Other Regulations	<p>Insert “<i>Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and establishing a European Chemicals Agency.</i> Available at http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2007:136:0003:0280:EN:PDF</p> <p>Insert “<i>Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures, and amending Directive 67/548/EEC and Regulation (EC) No 1907/2006</i>” (in short CLP)” Available at http://eur-lex.europa.eu/JOHtml.do?uri=OJ:L:2008:353:SOM:EN:HTML</p> <p>Add:</p> <ol style="list-style-type: none"> 1. “ADN” after the Inland Waterway entry 2. “ADR” after the Carriage by Road entry
68 Guides	<p>delete Technical Guidance Note WM1</p> <p>insert Technical Guidance Note WM2 ‘Hazardous waste Interpretation of the definition and classification of hazardous waste’</p> <p>Delete “The complete Idiots Guide to CHIP”</p>

END