

# How do I tell if a Safety Data Sheet (SDS) is legal?

This guide will help you understand how to read, and assess the quality of a safety data sheet. Fundamentally the ultimate test of any SDS is:

“Does this document provide me with the information to take the necessary steps to protect people and environment?”

If you have doubts about the information in an SDS then we recommend that you contact your supplier.

The 16 sections of an SDS are detailed in the rest of this guide along with some key pointers to help you assess the quality of the information.

## Section 1 – Identification of the Substance/ Preparation and of the Company/Undertaking

- Name of product
- Intended use of product
- Contact details - a European address and telephone number
- E-mail address of the person responsible for the SDS
- Emergency telephone number with hours of operation specified

## Section 2 – Hazards Identification

This section should contain a clear description of the hazards presented to people and the environment. It should be consistent with **Section 3** and **Section 15**. For example, if in **Section 3** you see that the product contains 90% of a substance that is classified as toxic by inhalation, you would expect an overall “Toxic” classification and this would be reflected in the regulatory information (the label) detailed in **Section 15**.

## Section 3 – Composition/Information on Ingredients

Each hazardous substance (ingredient) present in the product will be listed here. You should find details on:

- Chemical name
- EINECS or ELINCS number
- Concentration or concentration range
- Risk phrases associated with that ingredient

If the substances are listed in the Table 3.2 of part 3 of Annex VI of the CLP regulation (which replaces the HSE’s Approved Supply List), you should check the classifications match those given in this section. Check if the substances are listed in EH40. Cross check the exposure limits given in **Section 8**.

## Section 4 – First-Aid Measures

The actions that the first person at the scene of an incident could take. Look out for:

- Advice following exposure through different routes (contact with skin and eyes, breathing in fumes or swallowing the substance)
- Check advice is consistent with **Section 2** and **Section 9**.
- Have you got suitable first aid equipment available in your workplace?

(continued overleaf)

### The Fundamental Question

Does this SDS allow me to understand the risks and steps needed to protect:

- People (my staff, the wider community)
- Environment

### The 5-point test

1. How old is it? If pre-2007 check with your supplier that it is the most recent.
2. Are all 16 sections complete?
3. Does Section 1 match the product name or synonym?
4. Does Section 15 match the product label?
5. Do I understand the risks to people and the environment?

If you are unsure about the information in a SDS contact your supplier or refer to:

- CHIP/CLP regulations
- REACH regulation
- HSE Approved Code of Practice (ACOP) – Note this contains useful guidance but no longer has legal standing

## Section 5 – Fire-Fighting Measures

Information given should be consistent with **Section 2** and **Section 9**. Key information to look for:

- What can I use/not use to put out the fire?
- Hazardous combustion products (e.g. harmful fumes).
- Special advice for trained fire fighters.

## Section 6 – Accidental Release Measures

This section should help you manage small and large product spills whilst protecting people and the environment. Again, this should be consistent with **Section 2** and **Section 9**.

## Section 7 – Handling and Storage

This gives information to help protect your staff. This should be used to inform your COSHH risk assessment.

- Details of how to handle the product safely (including use of engineering controls) and to minimise release to the environment.
- Advice on where to store the product (e.g. refrigerated or heated storage). You will also find information about compatibility with materials used in standard storage vessels.

## Section 8 – Exposure Controls/Personal Protection

Provides detailed advice on how employees can minimise exposure to the product. If available, threshold limits should be given that should not be exceeded. Engineering controls (e.g. use of ventilation systems) or Personal Protection Equipment (PPE) should be specified.

Key information:

- Exposure limits from EH40, published by the HSE
- All ingredients with an associated exposure limit should be included in **Section 3**
- Check that exposure limits match those in EH40
- Engineering controls – what are they and when to use them
- Personal Protective Equipment (PPE) - advice on protection from exposure to eyes, skin and inhalation

## Section 9 – Physical and Chemical Properties

Make sure this relates to the product as supplied. As a minimum we would expect: colour, flash point, pH, density and water solubility.

In addition, REACH states that the following data should also be included, where relevant:

boiling point/range, flammability (solid, gas), explosive properties, oxidising properties, vapour pressure, fat solubility, partition coefficient (n-octanol/water), viscosity, vapour density and evaporation rate.

## Section 10 – Stability and Reactivity

- Conditions to avoid
- Materials to avoid
- Hazardous decomposition products
- Possible stabilizers

## Section 11 – Toxicological Information

- Acute toxicity (poisoning) by eating, breathing and skin absorption
- Corrosivity to the eyes, skin and respiratory tract
- Chronic toxicity (long term effects) e.g. sensitisation, carcinogenicity, mutagenicity and reproductive toxicity

## Section 12 – Ecological Information

- The potential effects of release to air, land or water
- Ecotoxicity – in particular to fish, daphnia and aquatic plants

## Section 13 – Disposal Considerations

- Reference to Hazardous Waste Regulations
- Suitable disposal methods for product and packaging

## Section 14 – Transport Information

- Classification for road, rail, sea and air
- Key information – UN Number, Proper Shipping Name, Hazard Class and Packing Group

## Section 15 – Regulatory Information

- Should reflect information in **Section 2**
- Describes product label – symbols for hazard classification, risk and safety phrases

## Section 16 – Other Information

List of the full wording of all risk phrases used throughout the SDS (including those for all ingredients identified in **Section 3**).

### Glossary

<b>ACOP</b>	Approved Code of Practice – issued by HSE to help companies meet the requirements of legislation
<b>ADR</b>	Laws controlling transport of hazardous goods by road
<b>CLP</b>	Classification, Labelling and Packaging of chemicals regulations - replaces CHIP
<b>CHIP</b>	Chemicals (Hazard Information and Packaging for Supply) regulations - gradually being replaced by CLP
<b>COSHH</b>	Control of Substances Hazardous to Health regulations
<b>EH40</b>	HSE publication providing guidance on safe chemical exposure limits
<b>EINECS</b>	European Inventory of Existing Chemical Substances
<b>ELINCS</b>	European List of New Chemical Substances
<b>IATA / ICAO</b>	Air transportation laws for chemicals
<b>IMDG</b>	International sea transportation laws for chemical products
<b>REACH</b>	Registration, Evaluation, Authorisation and Restriction of Chemicals regulation – sets out the requirements for safety data sheets
<b>RID</b>	Rail transportation laws