

### The Easy HANDBOOK of European SDSs

### **SECTION 1:**

identification of the substance/mixture and of the company/undertaking



# What information do I need to provide in section 1 of the SDS?



**1.1** Product identifier



**1.2** Relevant identified uses of the substance or mixture and uses advised against



**1.3** Details of the supplier of the safety data sheet



**1.4** Emergency telephone number



### **FIRST STEP** product identifier

The first step to take is to identify the product.

#### Is it a substance?

Is it a mixture?

To identify a **substance**, it is necessary to consider Article 18, paragraph 2, of Reg. (EC) No 1272/2008 (that is, the CLP Regulation);

to identify a **mixture**, it is necessary to consider **Article** 18, paragraph 3, letter a), of Regulation (EC) No 1272/2008 (CLP).

For substances subject to registration, the product identifier must match the one provided for registration and the assigned registration number must also be indicated. However, it is possible to provide additional identifiers that have not been used during registration. Let's go into more detail...



### How can I find the Product Identifier for substances?

Here are the options:

- **a)** if the substance is included in Annex VI to CLP, the name and identification number (INDEX number) as given therein;
- **b)** if the substance is not included in Annex VI to CLP but appears in the classification and labelling inventory (C&L), the name and identification number as given therein;
- **c)** if the substance is not included in Part 3 of Annex VI nor in the classification and labelling inventory, the number provided by the CAS ('CAS number') together with the name set out in the nomenclature provided by the IUPAC ('IUPAC nomenclature') or the CAS number together with another international chemical name(s);
- **d)** if the CAS number is not available, the name set out in the IUPAC nomenclature or another international chemical name(s).

When the name of the IUPAC nomenclature exceeds 100 characters, one of the other names (usual name, trade name, abbreviation) may be used, provided that it has been notified, together with the IUPAC name, in the notification submitted to ECHA for the purpose of establishing the C&L Inventory (Art. 40 to CLP). Identification numbers must be provided according to the stated **hierarchy**, and therefore a) before b), before c), before d). Any of the available identification numbers may be used, as long as they correspond to the identification numbers used on the label. If the safety data sheet pertains one or more nanoforms, or substances that include nanoforms, this shall be indicated by using the word **«nanoform»**.

# And how can I find the Product Identifier for mixtures?

### For a mixture, the product identifier shall be the trade name or designation of the mixture.

If a mixture has a unique formula identifier **(UFI code)** in accordance with Annex VIII to the CLP Regulation and if that UFI is indicated in the safety data sheet, then the UFI shall be provided in this subsection.

Please note that the only case in which the mixture's UFI must be provided in the SDS is that of dangerous mixtures placed on the market without packaging (and therefore without label).

Another case in which the UFI could be required in the SDS is that of dangerous mixtures supplied only to industrial sites. In this case the notifier can choose whether or not to indicate the UFI on the product label: if they do not, then they must indicate it in section 1 of the SDS.

# Subsection

# Relevant identified uses of the substance or mixture and uses advised against



After identifying the product, the second step is to list the relevant identified uses for the recipient(s) of the substance or mixture. You will have to provide a **brief description of the intended use of the substance or mixture**, for example 'for domestic use', 'antioxidant'. It is necessary to list, where applicable, the uses that the supplier advises against, with indications of the reason. You should not provide an excessively long list of usage descriptors, but a generic list of applications and a reference to any attached exposure scenarios.



# THIRD STEP Details of the supplier of the safety data sheet

It is important to identify the supplier, be it manufacturer, importer, only representative, downstream user, or distributor.

## Who is a supplier?

A chemical supplier is the company responsible for classifying the substances and mixtures it provides. It can be a manufacturer, formulator, or distributor, who must classify according to the rules provided in the CLP Regulation.

# How can I identify the supplier?

Simply write the company name of the manufacturer/supplier; the full address with the country ID, zip code and location; the telephone number; the e-mail address of the person responsible for the SDSs (preferably a non-personal address, which can be accessed by several people).



#### One last note

### In Section 1 it is also necessary to identify the distributor.

The role of the distributor is important because it acts as a bridge between manufacturers and customers, promoting safety communication along the supply chain that helps protect people and the environment from the risks related to chemicals.

## Who is a distributor?

Distributors are those who buy a chemical substance or mixture in the EEA (European Economic Area), store it and then place it on the market for third parties (even under their own brand but without changing its chemical composition in any way). For example, retailers and wholesalers are distributors under REACH and CLP. Not everyone is a distributor though!

## Who is NOT a distributor?

- Anyone who buys chemicals outside the EEA and places them directly on the EEA market. In this case they are an **importer**;
- Anyone who buys chemicals within the EEA and mixes them with other chemicals, dilutes them or uses them to fill containers before supplying them to third parties. In this case they are a **downstream user**.



## emergency telephone number



When dealing with chemical substances and mixtures, an emergency can always be around the corner.

### It is mandatory to provide a reference to emergency information services in the event of an emergency.

If there is an official advisory body in the Member State where the substance or mixture is placed on the market, it will be sufficient to indicate its telephone number. You can find a list on ECHA's page

https://echa.europa.eu/it/support/helpdesks Please note: in some countries the service is not free, or is subject to specific constraints.

If the Member State does not provide such a service, an emergency service belonging to the provider itself or to competent third-party providers of such services must be indicated. It is essential to specify the business hours (for example: it is available only at the following times: xx -xx) and it is useful to state the relative time zone, especially if the service is provided from a State with a different time zone from the State where the product is placed.

In addition to the opening hours to the public, you must also remember to add any additional information, such as the language(s) of the telephone service.

It is always possible to indicate, in addition to the official advisory body number, also the company telephone number, specifying the availability times.