



5 February 2016

Customer Letter 13

Status: 11 May 2015

Dear Customer,

**Subject:** Hazard communication – REACH and CLP – DuPont Polymers Businesses

We would like to again inform you about a modification of our approach to product hazard communication through European *Safety Data Sheets* (SDS) which we have started in 2012. According to REACH\* Articles 31, SDS or *extended Safety Data Sheets* (eSDS) are only required for hazardous substances and preparations. Therefore the SDS for the above businesses for non-hazardous grades have been replaced by *Product Safety Information Sheets* (PSIS). SDS for articles which had been provided in the past have been replaced by *Article Information Sheets* (AIS). Even though having a slightly different layout, the information content of both documents is the same as we would provide through a SDS.

Concerning SDS, some changes had been implemented starting in 2010. SDS requirements for chemical substances had changed in accordance with REACH\* and CLP\*\* and impacted both content and layout. In the case of SDS for preparations (e.g. polymers and polymer compounds), a transition period had been granted until end of November 2012.

Additional information, essentially resulting from the REACH registration dossiers, will continue to be gradually added to our SDS. Exposure scenarios for substances, developed for the purpose of REACH registration, will be newly included into the substance SDS transforming them consequently into eSDS. For preparations exposure scenarios will not be attached to SDS, but relevant information included in the body text of the SDS. Completely revised information on classification has appeared in Section 2 of the SDS.

We would like to emphasise that the SDS modifications mentioned above have not and will not go along with any changes in the composition of our products. The products will remain the same, only the text and content of the SDS has been adapted to the new legal requirements.

Concurrently, the implementation of CLP introduced a new classification system (Globally Harmonised System – GHS), with new graphical elements (hazard pictograms), signal word, new ratings (hazard classes and hazard categories), etc. to align the EU system to the global system.



Following CLP-related elements impact the SDS content:

- More substances and more preparations will be classified, but this does not mean that the substance or preparations have changed their hazard profile or become more dangerous;
- Classified products without graphical elements under the previous legislation might be attributed one or more pictograms;
- For a transitional time period, two different classification systems (previous system as per European Directive 68/548/EEC and the new system based on GHS) may coexist in Sections 2 and 3 of the SDS. This transition period ends 1 June 2015 (CLP, Article 61).
- As of 1 June 2015 new labels will need to be issued in the GHS format (CLP, Article 61).
- Labels for materials already in the supply chain before 1 June 2015, benefit from an additional transition period until 1 June 2017 before the packaging needs to be changed / relabelled (CLP, Article 61).
- Safety Data Sheets for materials already on the market before 1 June 2015 and for which the SDS already included the GHS classification, only need to be updated when revised anyhow (ECHA Newsletter Issue 6, December 2014).

The DuPont Polymers Businesses have / will gradually implement these changes in order to meet the different regulatory deadlines. We strongly recommend our customers to become familiar with both REACH and CLP.

We look forward to continuing to work closely with you.

Should you have any questions regarding the content of this letter or any other REACH related subject, please do not hesitate to contact us.

Yours faithfully,

Dr. Stefan Dully  
Regulatory Affairs Manager, DPM, EMEA

\* Regulation (EC) No 1907/2006 of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

\*\* Regulation (EC) No 1272/2008 of 16 December 2008 on classification, labelling and packaging of substances and mixtures (CLP). CLP is the European implementation of the Globally Harmonized System of Classification and Labelling of Chemicals, known as GHS, developed by the United Nations Economic Commission for Europe (UNECE)

Information on both Regulations as well as links to national helpdesks can be found on <http://echa.europa.eu/>

This information is based on our current level of knowledge and expresses only our intention. It does not constitute a binding obligation. Whilst the information is provided in good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information.

As we cannot be aware of all aspects of your business and the impact REACH Regulation may have on your company, we strongly encourage you to get familiar with REACH, its requirements and timelines.



Current EU pictograms	New CLP pictograms
 Explosive	 Explosive
 Oxidizing	 Oxidizing
 Flammable	 Flammable
	 Gas under pressure
 Harmful	 Irritating, sensitising, harmful
 Corrosive	 Corrosive
 Toxic	 Toxic
	 Carcinogenic, mutagenic or reproduction toxic
 Hazardous for the environment	 Hazardous for the aquatic environment