



Recent Updates on MSDS in Key Countries and What the Changes Entail

29 October 2021

Q & A Session

#	Question	Answer
1	[Korea] What should I prepare to apply for approval for non-disclosure?	<p>The following documents should be prepared to apply for approval for non-disclosure:</p> <ul style="list-style-type: none"> • Application for Non-Disclosure Approval • Documents to demonstrate the name and content of the hazardous ingredients to want to be written as the alternative information is a trade secret • Alternative information (Alternative name and alternative content) • Names and contents of hazardous ingredients, health hazards, environmental hazards and physical hazards of the hazardous ingredients • MSDS • Name and content of the non-hazardous ingredients in materials controlled under the MSDS system
2	[Korea] Is the grace period of total tonnage band granted based on each product volume or accumulation of several products volume per year?	<p>Since MSDS is based on one product, not substance, the total tonnage band for the grace period also depends on the volume of the product. For example, if you prepare MSDS for the product A with 3 different substances, the tonnage band will be the volume of the product, which is the accumulation of 3 substances' volume.</p>
3	[Turkey] Do we still need to provide SDS if the substance is not classified?	<p>If the substance is not classified but is PBT, included in "candidate for authorization list" or is exceeding thresholds in a mixture, SDS is required. Otherwise SDS is not obligatory.</p>
4	[Turkey] Can we use SDS prepared for EU in Turkey?	<p>No. SDS must be in Turkish and prepared by a certified author according to current SDS regulations in Turkey.</p>

5	[Turkey] How do we keep product composition confidential if mixture is hazardous?	Only hazardous substances need to be mentioned in the SDS, non-hazardous substances can be kept hidden.
6	[EU] There is a confusion to us with EU SDS requirement as per Regulation EU 2020/878. Some of the internet sources say that new SDS prepared from 1 Jan 2021 onwards must be in compliance with Regulation (EU) 2020/878. But as per ECHA SDS Guidance document, new safety data sheets authored for the first time after 1st January 2021 can be in accordance with Regulation EU 2015/830 until Dec 2022. Could you please advise which is the correct mandatory deadline for compliance to Regulation (EU) 2020/878?	<p>Currently, transition period is ongoing. Within this period, it is possible to use either of regulations, but it is always recommended to use new updated regulation.</p> <p>After 1st of January 2023, it is mandatory to use EU 2020/878.</p>