

# Product Stewardship - SDS Shipping

(Updated: November 2025)

Managing and distributing to each customer a compliant Safety Data Sheet (SDS) for all chemical products is a **legal requirement**. Syensqo fulfills this requirement using the SAP-EHS Tool and Automatic SDS distribution based on the SAP-EHS system.

Please consult the training material available on this topic: [SCO - Follow up of SDS Shipping](#).

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## Regulatory context

### EU regulation (applied in all other zones)

Under REACH Annex II, suppliers are required to provide recipients with a Safety Data Sheet (SDS) that complies with the specified guidelines. The SDS must be provided in an official language of the Member State(s) where the substance or preparation is marketed, unless the Member State(s) have different provisions.

Under Article 31.9 of the REACH regulation, suppliers are required to update the Safety Data Sheet (SDS) without delay in the following cases:

1. When new information affecting risk management measures or hazards becomes available.
2. When an authorisation for the substance has been granted or refused.
3. When a restriction has been imposed on the substance.

In addition, at Syensqo, the distribution of an SDS occurs when:

1. There is a mandatory update according to the progress of the product knowledge and the evolution of the regulation.
2. Set in compliance with the local regulations if necessary.
3. At the time of the first shipment of a chemical product to one client.
4. Re-distribution in case of a 'significant' modification in terms of safety for all the previous recipients within the last 12 months.

**This rule applies to all regions except North America. The following sections provide an overview of regulations for selected countries for your reference. Please note that the absence of information for other countries does not imply irrelevance. It is essential to consult the specific regulations of each country to understand their particular requirements**

### US regulation

The distribution of Safety Data Sheets (SDS) is governed by the OSHA Hazard Communication Standard and SARA 313 "Supplier Notification" regulations.

Criteria for distributing an SDS:

1. One SDS per dangerous good, translated in the official language(s) of the destination country.
2. Mandatory updates according to the progress of the knowledge (about the product) and the regulation's evolution.

3. Set in compliance with the local regulations if necessary (Canada and Mexico).
4. Distribution at least at the time of the first shipping of a chemical product.
5. For products which contain SARA 313 "Toxic Chemicals" (section 15 of the SDS), an SDS must be sent with the first shipment of the year.
6. Distribution in case of a 'significant' modification in terms of safety at least at the time of the next shipping.

## Chinese regulation

In China, the primary regulations governing the distribution of SDS are Decree No. 591 and the National Standard GB/T 16483-2008. These regulations mandate that SDS must be revised promptly when there are significant changes and that suppliers must provide complete and updated SDS to recipients. Due to the lack of specificity in these requirements, many multinational companies in China adhere to SDS standards from the USA or Europe. Additionally, some companies require a printed SDS to be attached with the shipping goods.

### Current Regulations

#### Decree No. 591 "Regulations on Safe Management of Hazardous Chemicals":

- a. Requirement: Safety Data Sheets (SDS) must be revised in a timely manner when there is a significant change in the information.

**National Standard GB/T 16483-2008: Requirement: Suppliers should provide complete SDS to recipients, ensuring the information related to safety, health, and the environment is included. Responsibility: Suppliers are responsible for updating the SDS and providing the latest version to recipients.**

### Practical Considerations

- **Lack of Specificity:** The requirements under Decree No. 591 and GB/T 16483-2008 are not very specific, leading many multinational companies in China to follow SDS requirements from the USA or Europe.
- **Printed SDS:** Some companies also require a printed SDS to be attached to the shipping goods to ensure compliance and safety.

## Korean regulation

The laws regulating the sending of the SDS in Korea are primarily governed by K-REACH (MoE) and the updated regulations under the Occupational Safety and Health Act (OSHA) administered by the MoEL. It is important to refer to the latest public notices and guidelines issued by the MoEL for the most current requirements.

When to Distribute an SDS in Korea?

1. **Initial Distribution:** It is mandatory to provide a Safety Data Sheet (SDS) to the customer with the first order or during the delivery of R&D samples. This ensures that the customer has all the necessary information about the chemical substances from the outset.
2. **Revisions and Updates:** It is also mandatory to resend the SDS to past customers if it has undergone a major revision. This includes updates following significant changes in the contents or after K-REACH registration, as part of downstream user communication.
3. **No Specific Period for Regular Resending:** There is no specific period mandated for regularly resending the SDS. However, suppliers must ensure that any major updates are communicated promptly to previous customers to maintain compliance and ensure safety.

## Japanese regulation

In Japan, the ISHA requires suppliers to provide an SDS with each transaction of hazardous chemicals, unless there is continuous or regular trade, in which case the SDS must be provided upon request. Significant updates to the SDS must be communicated to previous customers, ensuring all parties have the most current safety information.

### Legal Framework

- Industrial Safety and Health Act (ISHA)
  - Article 57-2: Mandates that manufacturers, importers, and suppliers provide an updated Safety Data Sheet (SDS) to customers when there are significant updates or changes to the information.
  - Ordinance on Industrial Safety and Health: Provides further details on the requirements and procedures for updating and distributing SDSs.

### Key Requirements

Provision of SDS

- **With Each Transaction:** Suppliers are required to provide an SDS with each transaction involving chemical substances or products containing certain hazardous chemicals.
- **Significant Updates:** When the SDS undergoes significant updates or changes, suppliers are obligated to make reasonable efforts to provide the revised SDS to previous customers.
- **Overlap with PRTR Law:** The list of substances for which an SDS must be provided includes those designated under the ISHA, which overlaps with many substances listed under the PRTR Law.

## Indian regulation

In India, the manufacture, storage, and transportation of chemicals are governed by several regulations, including:

1. **Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 (MSIHC Rules):** These rules specifically address the manufacture, storage, and import of hazardous chemicals. They outline safety measures, emergency procedures, and reporting requirements for handling hazardous chemicals.
2. **Motor Vehicles Act, 1988 and Central Motor Vehicles Rules, 1989:** These regulations govern the transportation of goods, including hazardous chemicals, by road. They include provisions for the safe transport of hazardous materials, vehicle specifications, driver qualifications, and emergency response procedures.

According to the provisions of the Motor Vehicle Rules, transporters must be provided with the necessary information about the chemicals they are transporting, including the Safety Data Sheet (SDS). Additionally, under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, every occupier is required to maintain and regularly update data on the chemicals they handle.

In light of the above, it is obligatory to provide an SDS with each consignment.

## Thai regulation

In Thailand, the primary regulation governing the provision of SDS is the "GHS Compliance for Hazardous Substances 2012 (B.E. 2555)" issued by the Ministry of Industry. This regulation requires importers to prepare and provide SDS according to the GHS template. Additional laws related to labour and transportation also mandate the provision of chemical safety information. While it is not mandatory to provide the SDS with each order or to resend revised SDS to past customers, it is common practice to do so to mitigate risks and liabilities.

### Current Regulations

1. **No REACH-like Requirements:** Thailand does not have REACH-like regulations at present.
2. **GHS Compliance for Hazardous Substances 2012 (B.E. 2555):**
  - a. **Issued by:** Ministry of Industry (MOI)
  - b. **Requirement:** Importers must prepare Safety Data Sheets (SDS) according to the Globally Harmonized System (GHS) template.
  - c. **Provision to Customers:** SDS must be provided to customers unless the customer has a specific template requirement.

### Related Laws

1. **Labor Law:**
  - a. **Requirement:** Employers must provide chemical safety information to employees.
2. **Transportation Law:**
  - a. **Requirement:** A pack of documents, including the SDS, must be available during transportation in case of an accident. This ensures that drivers or emergency response teams can access necessary safety information.

### Practical Considerations for Provision of SDS:

- It is not mandatory to provide the SDS with each order.
- **Common Practice:** many suppliers provide the SDS with each order to minimize risk and liability.
- **Not Mandatory to Resend:** It is not mandatory to resend an SDS that has undergone a major revision to past customers.
- **Upon Request:** Revised SDS can be provided upon the customer's request.

## Syensqo internal rules

1. One SDS per Commercial Product (regulated or not).
2. The Global Business Unit (GBU) responsible for manufacturing the product must ensure the creation of the product's specification number in the system and complete all necessary data entries. Additionally, the GBU is tasked with requesting the creation and/or update of the Safety Data Sheet (SDS). SDS Experts are responsible for the UN variant, while SDS Specialists must ensure that the local sections are created or updated accordingly.
3. The regional Customer Service which puts the product on the market is responsible in part for the SDS distribution. Customer Service must guarantee that there is a valid customer email address configured as SDS receiver contact.
4. Conversely, the SDS Authoring with the Operation team of the GBU team must ensure that the missing SDS are prepared and made available.

## SDS Distribution Pre-requisite

### Product

- Material

The flag "Environmentally relevant" must be activated in the "Basic Data 2" View of the material master ==> if not: No automatic distribution.

Ex:

Basic data 1	Basic data 2	Classification	Sales: sales org. 1	Sales: sales org. 2	Sales: general/plant	F...
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Material	176289	CYTOP 509 SAMPLE	
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Other Data			
Prod./insp. memo		Ind. Std Desc.	
Page format		<input type="checkbox"/> CAD Indicator	
Basic material	90085491		

  

Environment			
DG indicator profile	ZIP	<input checked="" type="checkbox"/> Environmentally rlvt	

In PF2: Quality code <> "X" must be defined in the Sale Organisation View ==> if not: No automatic distribution.

- Commercial Product

Material assignment needs to be done between Material code and PROD\_COM specification ==> if not: Error.

SDS variant for the country and in the corresponding translation must be available ==> if not: Error.

## Sales

- Sales Organization
  - Specific customizing for "SDB" correspondence needs to be defined by sales organizations in scope.
- Sale Order
  - The sales orders need to be configured to output "SDB" when the material and sales order type are relevant for SDS distribution.
- Customer
  - **Ship-to-Party or Sold-to-party** can be set up by default by sales organization. However, in case they are in different countries, the customer service must ensure that distribution will be done to the Ship-to-Party unless the Sold-to-Party is a distributor and our final customer.

## Variant and Language by Country

[Link Generation variants per country](#)

## Trigger for Distribution

### Customer order input (SD\_CALL)

The SDS is sent If the 'ship to' customer has not already received the same SDS/version within the last 12 months (all zones except North America or within the calendar year for US & CA (which is above the SARA 313 requirements)).

### Uploading of a new major version of the SDS (SUB\_CALL)

The new SDS update as a major version is sent to all the recipients for whom the previous version was distributed within the last 12 months (all zones except NA). It is not required for US.

### Manual printing (PRINT\_CALL or MAN\_CALL)

A MAN\_CALL and/or PRINT\_CALL is a manual action performed on purpose by the Product Stewards for emergencies or special requests from customers.

# SDS Distribution Process (Relevant point to consider)

## Sender

- In WP2: A unique generic sender email address.
- In PF2: Email address by sales organization. If not available, use the "Customer Care Service Representative" email.

## Recipient

- A dedicated partner function if defined for the sales area ("Z6") or, as priority 2, the contact persons 'ZS' (WP2) and 'ZM' (in PF2) if defined in the general view.
- Quick-FDS email address in copy for SDS distribution traceability (only used by SBS EMEA today)

## Language

- Official language(s) of the Ship-to country.
- In addition, the recipient's communication language if different from the previous one(s) and if the SDS is available in such language.

## Cover Letter

- A standard text translation in several languages (communication language of the customer if available).
- One for the first distribution.
- Another one in case of subsequent distribution.

## Communication Method

The communication method that must be used as principal is the "INT- E-Mail". **The customer's email should be added under the method "E-mail"**.

There exist some other AVAILABLE OPTIONS that can be used if necessary: Fax, Post (Letter), Pager/SMS, Printer, Remote Email, Telephone, Telex, URL (Homepage).

# Shipping orders follow-up

## SDS Distribution followup

- Errors on the SDS Distribution occur mainly to this 3 causes:
  - Local SDS not available;
  - Error on the email of the recipient of the SDS;
  - Technical reasons.
- CVD1 transaction is the way to analyze all distribution processes generated in the SAP EHS system. The CVD1 report lists:
  - The sales orders and indicate if it was relevant for SDS shipping;
  - The SDS variant and language that was sent;
  - The customer details;
  - It highlights data or technical errors.

## Distribution recycling process

- In the CVD1 transaction, a manual process is available for SDS distribution error recycling.

## BW reporting - KPI and Error analysis

- A BW report exists for SDS Distribution KPI: **BW - SDS Shipping Reporting (Core Workbook)**
  - This report describes the **coverage efficiency** of SDS Shipping by geographic zone and GBU. The coverage efficiency is when the customers receive the correct SDS (correct version & correct email of the customer);
- For the company, the **coverage rate** is also an important indicator of the SDS distribution. This indicator is the perimeter of the Sales organization where the distribution of SDS works.

- For this KPI, it is necessary to make an extraction in BW for the sales (sales org with active order entry for the products relevant for the distribution);
- It is also necessary to the list of active sales organizations (sales org. with active distribution).