

IMPROVING COMMUNICATION IN THE SUPPLY CHAIN

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Supply chain communication is key in order to achieve the REACH Regulation objective of reducing the risk associated to the exposure of substances for the human health and the environment.

As the intermediary between chemical manufacturers and downstream users, chemical **distributors play an important role** in the supply chain communication having the obligation to pass relevant information on the chemical substance or mixture (Safety Data Sheet¹ and Exposure Scenarios²) to the next actor or distributor in the supply chain.

However, the practical implementation of this REACH requirement, **places a burden** on the chemical industry in general, and for chemical distributors in particular.

Chemical distributors receive information on the same substance from multiple suppliers in differently structured forms and **face the challenge** of having to consolidate all this information in order to make it available to its customers.

For that reason Fecc firmly believes that:

- **The structure of the Safety Data Sheet** should follow the specifications of Annex II of the REACH Regulation,
- **The structure of the Exposure Scenarios** should follow the specifications of the “Guidance on Information Requirements and Chemical Safety Assessment, [Part D: Framework for exposure assessment](#) “ of the European Chemical Agency (ECHA),
- **The standard phrase catalogues** [EuPhraC](#) and [ESCom](#) Phrases, developed by the chemical industry should always be used for both the contents of the safety data sheet as well as for the annexed exposure scenarios, and
- [SDSComXML/ESComXML](#) as **the electronic communication standard** for the exchange of Safety Data Sheets and Exposure Scenarios should be used.

Fecc believes that, only if this happens, will it be possible to successfully communicate the relevant information in a comprehensive and useful way along the supply chain and positively contribute to the **improvement of occupational safety and environmental protection**.

¹ According to article 31.1 of REACH Regulation

² According to article 31.7 of REACH Regulation