



Critical SDS Check for use by Geothermal Operator



Critical Check Conductor (central organization or operator)	Name				Date		
Contact person	Name				E-mail		
Remark							
SDS IDENTIFICATION							
SDS-ID							
Product (on SDS)	Name						
Supplier (on SDS)	Name				Address		
SDS Version	Issue date				Version		
DOCUMENT CHECK	SECTION	EVALUATION			ACTION FOR SUPPLIER / OPERATOR		
REACH Compliant SDS (format conform REACH Annex II)	01-16	<input type="checkbox"/> Yes	<input type="checkbox"/> No (1)	<input type="checkbox"/> Unclear (1)	<input type="checkbox"/> (1) Request REACH Compliant SDS from Supplier		
REACH Compliant SDS (correct language)	01-16	<input type="checkbox"/> Dutch	<input type="checkbox"/> English, French, German (2)	<input type="checkbox"/> Other language; not usable (3)	<input type="checkbox"/> (2) Request Dutch SDS from Supplier <input type="checkbox"/> (3) Request Dutch / English SDS from Supplier (needed for acceptance)		
SDS Type (SDS 01-16)	<input type="checkbox"/> Extended SDS	<input type="checkbox"/> TIUSCC SDS (4)	<input type="checkbox"/> EU SDS	<input type="checkbox"/> Non-EU-SDS / Unclear (5)	<input type="checkbox"/> (4) Check with the Supplier if the TIUSCC SDS is covering the identified use by the operator or if not what follow-up action should be taken. <input type="checkbox"/> (5) Request REACH Compliant SDS from Supplier		
Remark of document check							
PRODUCT & SUPPLIER IDENTIFICATION	SECTION	EVALUATION			ACTION FOR SUPPLIER		
Product definition clear?	01	<input type="checkbox"/> Substance	<input type="checkbox"/> Mixture	<input type="checkbox"/> Unclear (6)	<input type="checkbox"/> (6) Request an updated SDS from the Supplier without the unclarity or get and store a satisfying answer from the Supplier		
Product identification clear?	01	<input type="checkbox"/> Yes	<input type="checkbox"/> No (6)	<input type="checkbox"/> Unclear (6)			
Supplier identification clear?	01	<input type="checkbox"/> Yes	<input type="checkbox"/> No (6)	<input type="checkbox"/> Unclear (6)			
Remark on identification check							
COMPLIANCE STATUS	SECTION	EVALUATION			ACTION FOR SUPPLIER / OPERATOR		
Product - Biocide? CtgB number		<input type="checkbox"/> Yes, by SDS	<input type="checkbox"/> Yes, by Supplier Statement	<input type="checkbox"/> No <input type="checkbox"/> Unclear (7)	<input type="checkbox"/> (7) Request an updated SDS fixing the unclear issues or get and store a satisfactory Compliance Statement from Supplier (needed for acceptance)		
REACH registration status clear	01/03	<input type="checkbox"/> Yes, by SDS	<input type="checkbox"/> Yes, by Supplier Statement	<input type="checkbox"/> No/Unclear (7)			
Relevant identified uses (for the operator)		<input type="checkbox"/> Cementing <input type="checkbox"/> Completion <input type="checkbox"/> Workover <input type="checkbox"/> Drilling	<input type="checkbox"/> Production <input type="checkbox"/> Stimulation <input type="checkbox"/> Utility <input type="checkbox"/> Other applications (remark)		Remark		
Relevant identified uses (see above) present for Operator activities (Ext-SDS)	01	<input type="checkbox"/> Yes	<input type="checkbox"/> No / unclear (7)	<input type="checkbox"/> Not Applicable	<input type="checkbox"/> (7) Request an updated SDS fixing the unclear issues or get and store a satisfactory Compliance Statement from Supplier (needed for acceptance)		
Relevant uses advised against for the Operator activities (Ext-SDS)?	01	<input type="checkbox"/> Yes / Unclear (8)	<input type="checkbox"/> No	<input type="checkbox"/> Not Applicable	(8) Operator to check if his use is really meeting the use advised against and take business decision to either proof that his use is safe or stop using the product		
Classification and labelling only included in accordance with CLP?	02/03	<input type="checkbox"/> Yes	<input type="checkbox"/> No (9)	<input type="checkbox"/> Unclear (9)	<input type="checkbox"/> (9) References to the old classification and labelling in line with 67/548/EEC or 1999/45/EC are no longer allowed since June 2017. Request an		



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					updated SDS from the Supplier with only CLP references
REACH Substances of very high concern (svHC) (SDS 03/15)	<input type="checkbox"/> Unclear (10)	<input type="checkbox"/> Authorization list (REACH Annex XIV) (10)	<input type="checkbox"/> Restriction list (REACH Annex XVII) (10)	<input type="checkbox"/> Candidate for authorization (REACH Art 59) (10)	<input type="checkbox"/> Not available (10) Operator to check impact on his business case and take action (if needed)
Remark by compliance status check					
COMPOSITION AND CLP CLASSIFICATION	SECTION	EVALUATION			ACTION FOR SUPPLIER
Is the composition in section 3 clear and consistent with the product definition?	03	<input type="checkbox"/> Yes	<input type="checkbox"/> No (11)	<input type="checkbox"/> Not required for substance or non-hazardous mixture	<input type="checkbox"/> (11) Request an updated SDS from the supplier fixing the unclarity or get and store a satisfactory explanation from the Supplier
Is the CLP classification of the substance(s) in section 2 and / or section 3 in line with REACH Registration dossier (ECHA website)?	02/03	<input type="checkbox"/> Yes	<input type="checkbox"/> No (12)		<input type="checkbox"/> (12) Request an updated SDS with correct CLP label data from Supplier or get and store a satisfactory explanation from the supplier
Remark on composition / CLP check					
OTHER FINDINGS	SECTION	EVALUATION		ACTION FOR SUPPLIER	
Emergency number present? Dutch NVIC number in Dutch SDS for hazardous mixture?	01	<input type="checkbox"/> Yes	<input type="checkbox"/> No (13)	<input type="checkbox"/> (13) Inform Supplier that a relevant emergency number is missing, as expected by the Dutch Inspection. If possible, an updated SDS would be appreciated.	
Personal Protective Equipment (PPE) provided with details like material, thickness & breakthrough time of the gloves?	08	<input type="checkbox"/> Yes	<input type="checkbox"/> No (14)	<input type="checkbox"/> (14) Inform Supplier that a detailed description of the PPE is missing, as expected by the Dutch Inspection. If possible, an updated SDS would be appreciated.	
Any other observations in the SDS?	01-16				<input type="checkbox"/> (15) Inform Supplier on findings
CONCLUSION & FOLLOW-UP ACTIONS					
Critical Check completed?		<input type="checkbox"/> Yes	<input type="checkbox"/> No	Critical Check Conductor to explain why not:	
Communication to Supplier Needed?		<input type="checkbox"/> Yes	<input type="checkbox"/> No	If marked in the document, the Supplier is requested to check and respond to the actions (1), (3), (4), (5), (6), (7) (9), (11) and (12) If marked in the document, the Supplier is recommended to also check and respond to the actions (2), (13), (14) and (15)	
Follow-up actions by Operator needed?		<input type="checkbox"/> Yes	<input type="checkbox"/> No	If marked in the document, the Operator is recommended to check the actions (8) and (10)	