



**COMMUNICATION FROM THE EUROPEAN ABRASIVE INDUSTRY
TO ITS CUSTOMERS AND DOWNSTREAM USERS
ABOUT SDS AND VPI IN EUROPE**

In Europe, the Abrasives Industry Provides ‘Voluntary Product Information’ (VPI) Instead of ‘Safety Data Sheets’ (SDS)

Abrasive Products Are Defined as Articles, Not Substances or Mixtures under REACH

Abrasives products such as coated, non-woven, bonded and super-abrasives are all ‘articles with no intended release’ according to the REACH Regulation (Registration, Evaluation and Authorization of Chemicals). These products are excluded from the obligation to register and notify substances in articles (REACH Regulation – Article 7) and to provide a ‘Safety Data Sheet’ (SDS) (REACH Regulation - Article 31).

Some abrasive products are exempted from this status including: polishes, pastes and grains, which are defined as mixtures/substances.

Instead of an SDS, members of FEPA (Federation of European Producers of Abrasives) provide *on a voluntary basis*, ‘Voluntary Product Information’ (VPI). A VPI contains all relevant information as would have appeared in an SDS.

Description	Is the Abrasives Industry Under an Obligation to Provide?
Types of Products	SDS in Europe
Bonded Abrasives	✘
Coated Abrasives	✘
Superabrasives	✘
Polishes, Pastes, Grains*	✔

* Exemptions might apply.

**Do You Really Need an SDS from the Abrasives Industry in Europe?
Why We Can’t Provide an SDS as an Industry.**

By implication, supplying an SDS to a customer in Europe may inadvertently and incorrectly indicate to the authorities that the product supplied should be subject to obligations under REACH. As a result, supplying an SDS may create confusion and uncertainty regarding your company’s legal obligation on the application of the REACH regulation, and possible complications with your national authorities. It also provides misleading information to the national authorities about the legal status of abrasive products.

How Will the Abrasives Industry Fulfil Your Request for an SDS?

The abrasives industry listens to the needs of its customers. Many of you are familiar with the format and structure of an SDS and prefer the communication of information on abrasive products in this format.

Therefore, FEPA has instructed its members to provide *on a voluntary basis* a ‘**Voluntary Product Information**’ (VPI). A VPI contains a lot of the same information on the safe use and handling of abrasives, including information on the waste status, like an SDS. Only some of the sub-headings of the SDS format have been excluded, according to the REACH regulation.

What Do We Recommend to You, Customers of the Abrasives Industry?

The abrasives industry recommends that you use a ‘**Voluntary Product Information**’ (VPI) instead of a non-EU SDS (such as US SDS) for abrasive products used in Europe. A non-EU SDS is based on different legal provisions, which do not reflect the legal situation in Europe such as in the case of occupational limit values and classification of waste.

What are the differences in a producer’s obligations when selling their products in Europe compared to those in the United States?

Description	Is the Abrasives Industry Under an Obligation to Provide?	
	SDS in Europe	SDS in the United States*
Bonded Abrasives	✘	✔
Coated Abrasives	✘	✔
Superabrasives	✘	✔
Polishes, Pastes, Grains*	✔	✔

* Exemptions might apply.