

The current safety data sheet, the evidence behind it, and who approved it.

For EHS, regulatory, technical and quality teams choosing software to control supplier SDSs and to author, review and issue SDSs for their own products.



Know the 16 sections

What each holds and who must supply it.

Know which rules apply

UN GHS, US HazCom, EU REACH and CLP, and how they differ.

Control every revision

Supplier changes, reviews, labels, training links and evidence.

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Who this is for

EHS and product stewardship managers, regulatory affairs, technical and formulation teams, quality and IT in chemicals, coatings, cleaning products, cosmetics, ingredients and other manufacturing that handles hazardous chemicals.

Important. Software does not classify hazards, decide what an SDS must say, or give emergency or safety advice. Qualified people determine hazards and approve content. Requirements differ by country; this guide is not legal or safety advice.

Two jobs, one control. Most sites must keep current SDSs for chemicals they receive. Manufacturers and importers must also prepare SDSs for products they place on the market. Good software handles both with the same revision discipline.

1 • THE PROBLEM

Where SDS control breaks down

Safety data sheets go out of date quietly. A supplier revises one, a formula changes, or a market adds a requirement, and nobody connects it to the copy on the shelf.

WHAT HAPPENS	USUAL CAUSE	WHAT GOOD LOOKS LIKE
Old supplier SDS in the binder	New revision emailed to one person	Received revision logged, reviewed and made current
Product SDS doesn't match formula	Formula changed without SDS review	Formula change flags the SDS for review
Wrong language or country version	One file reused everywhere	Version per market and language, clearly identified
Label and SDS disagree	Maintained separately	Label content reviewed with the SDS revision
Can't show who approved	Approval by email	Recorded review and approval with date
Workers can't find it	Stored in an office	Accessible to employees where they work

The outcome to buy. For any chemical or product, show the current SDS per market, the evidence behind it, what changed from the last revision and who approved it.

Not a classifier. Be wary of any tool that promises automatic compliance. Ask who is accountable for the hazard determination.

Five-minute check of your current position

CHECK	WHAT GOOD LOOKS LIKE	OK
Supplier SDS age	Pick five raw materials; each current SDS matches the supplier's latest revision	☐
Product SDS link	Each product SDS names the formula revision it describes	☐
Approval record	You can show who approved the current revision, and when	☐
Market versions	Each market you sell in has its own identified version	☐
Worker access	A worker on any shift can reach the SDS without asking the office	☐

2 · SCOPE

UN GHS, US HazCom, EU REACH and CLP

The UN GHS is a model. Countries adopt it in their own laws, choosing which revision and which parts. That is why SDSs differ between markets.

FRAMEWORK	TYPE	WHAT IT MEANS FOR SDSS
UN GHS (Rev. 11, 2025)	UN model system	Classification criteria, label elements and the 16-section SDS format; not law by itself
US OSHA Hazard Communication, 29 CFR 1910.1200	US law (workplace)	Manufacturers and importers classify and provide SDSs; employers keep them accessible; 2024 update aligned with GHS Rev. 7 with phased dates
EU REACH Regulation 1907/2006, Annex II	EU law	Requirements for SDS content; Annex II replaced by Regulation 2020/878
EU CLP Regulation 1272/2008	EU law	Classification, labelling and packaging; revised by Regulation 2024/2865 with phased application
Other countries (e.g. Canada WHMIS, UK GB CLP, Australia WHS)	National law	Own adoption of GHS, language and format details

Check dates and versions. Several recent amendments apply in phases. Confirm current application dates with the official source for each market you sell in.

Transport is separate. Section 14 refers to transport rules (e.g. UN Model Regulations, ADR, IMDG, IATA, US DOT). Classification for transport is a distinct, specialist task.

Market worksheet: fill in one row per market you sell in

MARKET	FRAMEWORK ADOPTED	LANGUAGE(S)	VERSION / DATES CHECKED	OWNER
United States	OSHA HazCom 29 CFR 1910.1200	English		
European Union	REACH Annex II + CLP	Member-state language(s)		

The 16 sections and who supplies them

Each section needs an owner and a source of evidence. Sections 2 and 3 drive much of the rest.

1 Identification	2 Hazard identification	3 Composition / information on ingredients	4 First-aid measures
5 Fire-fighting measures	6 Accidental release measures	7 Handling and storage	8 Exposure controls / personal protection
9 Physical and chemical properties	10 Stability and reactivity	11 Toxicological information	12 Ecological information
13 Disposal considerations	14 Transport information	15 Regulatory information	16 Other information

SECTION GROUP	TYPICAL EVIDENCE	USUAL OWNER
1 Identification, 16 Other	Product identity, supplier details, revision date and changes	Regulatory
2 Hazards, 3 Composition	Classification, ingredient identities and concentrations, disclosure decisions	Qualified classifier
4–8 Response and handling	Hazard-based measures, exposure limits, PPE	EHS / toxicology
9–12 Properties and effects	Test data, literature, supplier data	Technical / lab
13–15 Disposal, transport, regulatory	Jurisdiction-specific rules and lists	Regulatory / logistics

Sections 12–15 in the US. OSHA requires the headings; content for these sections is not enforced by OSHA because other agencies govern it. Other jurisdictions may differ.

4 • SUPPLIER SDSS

Supplier SDSs: receive, check, control

Every hazardous chemical you receive needs a current SDS your people can reach. The weak point is noticing revisions.

1	Receive With the first shipment, on revision, or via the supplier	RECORDED Document, revision date, supplier, language	WHO DECIDES Receiving / supplier quality
2	Check Right product, market version, language, complete 16 sections	RECORDED Check result	WHO DECIDES EHS
3	Compare What changed since the last revision	RECORDED Changes noted	WHO DECIDES EHS / regulatory
4	Make current Replace and archive the previous revision	RECORDED Current and archived versions	WHO DECIDES EHS
5	Act Review labels, training, your own product SDSs	RECORDED Linked actions	WHO DECIDES Owners

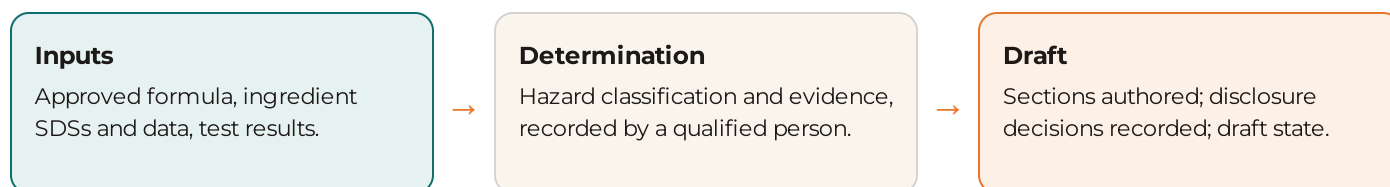
CHANGE IN A SUPPLIER SDS	POSSIBLE KNOCK-ON
New hazard classification	Your product's classification and label may change
New exposure limit or PPE	Workplace controls and training
Composition change	Section 3 of your product SDS; allergen or restricted-substance checks

Demo test. Upload a revised supplier SDS and show which of your products and documents are linked to that raw material.

5 • AUTHORIZING

Authoring SDSs for your own products

Your product SDS should start from the formula in force and the evidence for each ingredient, with the hazard determination made and recorded by a qualified person.



AUTHORIZING STEP	WHAT TO RECORD
Link to formula revision	Which formula version the SDS describes
Hazard determination	Classification, method, evidence, who determined
Composition disclosure	Which ingredients disclosed, ranges, any confidential business information claims
Sections authored	Content per section, with sources
Market variant	Country, language, regulatory section

Confidential business information. Rules for withholding ingredient identity or concentration differ by jurisdiction. Record the decision and its basis; get it reviewed.

Worked example: authoring record for CL-40 surface cleaner, rev 2

FIELD	RECORDED ENTRY (ILLUSTRATIVE)
Formula revision	CL-40 formula rev C, approved
Inputs	Ingredient SDSs incl. supplier rev 4 for Surfactant S-12; pH test result
Determination	Recorded by the qualified author with method and evidence attached
Disclosure	Two ingredients disclosed by range; basis recorded for review
State	Draft until a reviewer approves

6 • APPROVAL

Review, approval and issue

A draft is not an SDS. Approval should be a recorded decision by an authorised reviewer, and only the issued revision should reach customers and workers.



CHECK	WHAT GOOD LOOKS LIKE	OK
Saving is not approving	Draft state stays until a reviewer approves	☐
Reviewer	Named, authorised, different from the author where your procedure requires	☐
Changes visible	What changed from the previous revision is shown to the reviewer	☐
Issued document number	Unique number and revision date on the issued SDS	☐
Distribution	Customers who received the product get the new revision as your rules require	☐
History	Previous revisions retained and retrievable	☐

Ask to see. A draft that cannot be issued until approved, and the approval record with name, date and meaning.

Example approval trail (illustrative names)

STEP	WHO	MEANING	WHEN
Draft saved	A. Rivera, SDS author	Authored	3 Mar 09:40
Changes reviewed	J. Okafor, regulatory	Reviewed	4 Mar 15:10
Approved	J. Okafor, regulatory	Approved	4 Mar 15:12
Issued	Regulatory	Issued as rev 2; rev 1 superseded	5 Mar 08:00

7 • REVISIONS

When a revision is needed

Most rules require an SDS update when significant new information becomes available. Your procedure should say what triggers a review and how fast.

TRIGGER	EXAMPLE	WHO REVIEWS
Formula change	New preservative or concentration change	Regulatory / technical
Supplier SDS change	Ingredient reclassified	Regulatory
New hazard information	New test result or literature	Toxicology / regulatory
Regulatory change	New classification criteria or exposure limit	Regulatory
New market	Selling into a new country	Regulatory
Periodic review	Scheduled review by your procedure	Regulatory

REVISION COMPARISON (EXAMPLE, CL-40 CLEANER)	REV 1	REV 2
Section 2 classification	Eye irritation Cat. 2	Serious eye damage Cat. 1 (determined by reviewer)
Section 3 composition	Surfactant A 5–10%	Surfactant A 10–15%
Section 8 PPE	Safety glasses	Goggles or face shield
Trigger	—	Supplier SDS revision and formula change

Illustrative only. This example does not classify any real product.

Decide in your procedure

- Which events trigger a review, and who is told.
- The time allowed to review and, if needed, issue a new revision; check each market's rule rather than assuming one deadline.
- How customers who already received the product get the new revision.

Labels, training and access

An SDS revision usually touches other controlled documents and people. Linking them prevents mismatches.

LINKED ITEM	WHAT TO CHECK ON REVISION
Product labels	Pictograms, signal word, hazard and precautionary statements match
Workplace labels	Secondary container labels updated where needed
Training	Affected workers briefed on new hazards or PPE
Work instructions	Handling, storage and PPE steps updated
Customer documents	New revision sent or published as required
Restricted-substance checks	Customer or market restrictions reviewed

Worker access. US HazCom requires SDSs to be readily accessible to employees in their work area during each shift. Check your own jurisdiction's rule.

Not emergency guidance. The SDS informs response; your emergency procedures and trained responders handle incidents.

Revision impact worksheet: CL-40 rev 2 (illustrative)

ITEM	CHANGE NEEDED?	OWNER	DONE
Product label (pictogram, signal word)	Yes: Danger, corrosion pictogram	Packaging	
Workplace containers	Yes	EHS	
Training briefing	Yes: goggles or face shield	Supervisors	
Work instruction WI-17	Yes: PPE step	Production	
Customer distribution	Send rev 2 to recipients since last issue	Customer service	

Evaluation checklist and RFP

AREA	WHAT TO SEE DEMONSTRATED	SYSTEM A	SYSTEM B
Supplier intake	Revised supplier SDS logged, compared and made current.	_____	_____
Links	Products and documents linked to a raw material shown.	_____	_____
Authoring	Product SDS drafted from formula in force with evidence.	_____	_____
Determination	Hazard determination recorded with who and evidence.	_____	_____
Disclosure	Composition disclosure decisions recorded.	_____	_____
Approval	Draft cannot be issued until approved.	_____	_____
Revision compare	Changes between revisions visible.	_____	_____
Markets	Country and language variants identified.	_____	_____
Access	Workers can reach the current SDS.	_____	_____
Total (0–3 each)		_____	_____

RFP questions

- Who performs hazard classification, and how is it recorded?
- Which jurisdictions and languages can you produce?
- How are supplier revisions noticed and compared?

Ask for evidence

- An issued SDS with its approval record.
- A revision comparison.
- Which plan includes SDS authoring.

Scoring and demo script

- **0** not shown
- **1** described only
- **2** shown with sample data
- **3** shown with your own product and evidence
- Bring one real formula and two ingredient SDSs.
- Ask the vendor to draft, review, approve and issue it live.
- Then revise one ingredient and watch what changes.

Where V5 fits, plans and sources

- **V5 safety data sheets:** author, review and issue product SDSs from controlled evidence; record finished-product hazard determinations with supporting evidence; author sections; review composition disclosure decisions; track draft, approved and issued states; see SDS state on the formulas list.
- **Limits:** saving a draft does not approve it. Qualified authors and reviewers supply and assess the hazard determination and content. V5 does not replace professional classification or guarantee compliance.
- **Plans:** SDS authoring is not listed separately in current plan entitlements; ask which plan includes it for you. Document control, e-signatures and supplier portal are Professional and Enterprise.

Primary sources; applicability depends on your products and markets. Links reviewed 1 October 2026.

UN model system

- **UNECE — GHS Rev. 11 (2025)** — unece.org/transport/publications/globally-harmonized-system-classification-and-labelling-chemicals-ghs-rev-11

US law

- **29 CFR 1910.1200 — Hazard Communication (incl. Appendix D, SDS)** — www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1910/subpart-Z/section-1910.1200
- **OSHA — Hazard Communication rulemaking (2024 update and dates)** — www.osha.gov/hazcom/rulemaking

EU law

- **Regulation (EC) 1907/2006 — REACH (Article 31 and Annex II)** — eur-lex.europa.eu/eli/reg/2006/1907/oj
- **Regulation (EU) 2020/878 — amending REACH Annex II (SDS format)** — eur-lex.europa.eu/eli/reg/2020/878/oj
- **Regulation (EC) 1272/2008 — CLP** — eur-lex.europa.eu/eli/reg/2008/1272/oj
- **Regulation (EU) 2024/2865 — amending CLP** — eur-lex.europa.eu/eli/reg/2024/2865/oj

Try it with one of your products. 7-day free trial, no card required, at v5ultimate.com.

A sensible first month

- Agree authors, reviewers and markets; confirm which plan includes SDS authoring.
- Load approved formulas and ingredient evidence for a pilot product family.
- Author, review and issue one SDS; compare with your current document.
- Write your revision triggers into the procedure before scaling up.