

1st December 2016

HS023 - The use of lead sulfochromate yellow and lead chromate molybdate sulfate red in paints.

Downstream User Checklist

Action	Comments	Dates
Obtain latest SDS from HMG	Available on the HMG website	As soon as possible
Obtain latest Extended Safety Data Sheet (eSDS) from HMG	Available on the HMG website	As soon as possible
If you relabel products supplied by HMG, ensure all new labels contain required information including Authorisation Numbers		As soon as possible
Identify use by your customer to ensure all relevant exposure scenarios are considered		As soon as possible
Maintain a personal protective equipment programme on the selection, use, maintenance, training (including respiratory protection equipment)		As soon as possible
Notify your use to ECHA	See HMG REACH IT guidance, available on the HMG website	Within 3 months of first delivery after Official publication (14th Sept 2016)
Verify the risk management measures and operational conditions are in line with those outlined in the eSDS	Use HMG's Verification / Notification template to submit to ECHA Available on the HMG Website	Every March 2016 data to be provided by March 2017
Provide ECHA with: <ul style="list-style-type: none"> Blood lead data Chromium in air data Surveillance record for each worker exposed 	This information has to pass up the supply chain, so it should also be sent to the Authorised pigment supplier (DCC) directly	
Notify HMG if risk assessment measures assigned in the eSDS are not appropriate and / or new information on hazardous properties is available		As soon as possible
Prepare assessment of alternatives: <ul style="list-style-type: none"> Define the end use Identify the alternatives associated with each end use Explain why the alternatives are not a sufficient replacement (technical & economic considerations) 	Use HMG's Assessment of End Use & Alternates template to submit to ECHA. Available on the HMG website	30th June 2017

Downstream users are users of chemicals under REACH and CLP. They are companies or individuals; within the European Union/European Economic Area, who use a substance, either on its own or in a mixture, in their industrial or professional activities.