

Frequently asked Questions

We know that the current legislative environment is difficult and frustrating to navigate. ChemGes can be a wonderful tool that will simplify your work in generating SDSs. ChemGes is comprehensive and very capable. It is possible to almost fully automate your generation of SDSs. In order to facilitate such capabilities, ChemGes provides a myriad of settings and options. As with any software, these can seem overwhelming at first. Below, you will find explanations to matters frequently discussed with customers, via hotline support.

1. General:

a. Do not expect ChemGes to generate an SDS identical to that of your supplier.

- Every SDS is different. They are based on the data available to the creator of the SDS, on what is deemed important by one company, often on old legislation (non-GHS) and at times even on the capabilities of the SDS creator.
- This does not mean that either of them is correct or incorrect. In such a situation, you are required to use due diligence.

b. ChemGes calculations are based on formulae from the legislation, as far as they exist and on formulae based on the legislation, generated by our staff of experts.

- We do not base our calculations or data on 'Guidance Documents' (ie ECHA, EPA,...). When there is a discrepancy, the legislation takes precedence.

c. Raw Materials are those with a CAS number and Preparations are a combination of Raw Materials.

- Many companies have Raw Materials that are in actuality intermediate products consisting of Raw Materials (CAS Numbers).
- It is necessary to set up these intermediates in ChemGes as preparations, so that, for calculation, as is legislatively required, they can be broken down into their Raw Materials.
- This also means that data/classification changes need to be done at the lowest level of the breakdown, so that they carry through. (i.e. Changing the classification of an intermediate will not carry through to the final product – it is necessary to change the Raw Material Data so that it leads to the desired change).

d. ChemGes has a large amount of settings which can have major impacts.

- Due to the different forms of legislation, different needs of industries, different interpretations/applications of legislation and different customer needs, ChemGes is filled with an extensive amount of settings.

- Before changing settings, be certain that you are aware of what the setting does and what global or local impact it will have within ChemGes.
- Details to the various settings can be found in our manual (www.dr-software.com on the 'downloads' page) or by pressing *Help* in any ChemGes screen and choosing *Context Related Help*. Of course, we are available to help via email and telephone.
- It is important for you to have access to the legislation, so any interpretation or preference settings can be set based upon educated decisions.

e. The GHS is NOT harmonized.

- The original GHS – the *Purple Book* (UN GHS) – is not legislation and thus not enforceable.
- The GHS becomes enforceable by the adoption of the UN GHS into a country's legislation.
- As the GHS permits a building block approach to adoption, not all Classes/Categories are adopted by every country. Some countries also generate their own Classes, adapt the text of certain phrases or vary limits, among other things.
- The most dramatic differences from the UN GHS were made by the EU (the CLP), the US (the OSHA HCS) and Canada (WHMIS 2015).
- Various countries have now proceeded to produce lists of officially classified substances, which can vary from country to country.
- Therefore, ChemGes gives you the capability to generate country-specific SDSs, taking the many differences and nuances into consideration.

f. It is best when all serious changes (Copies, Variants, Data Adjustments,...) in ChemGes are labeled by a Memo.

- This can be accessed in the *Maintenance of Raw Materials* or *Maintenance of Preparations* screens by pressing *Alt F11* or the corresponding button.
- Memos will ensure that details are remembered in the future and are passed on to other users.

g. Transport legislation calculation

- In most cases, it is possible to calculate a specific transport classification, but some classes, as well as often the choosing of UN Numbers, require human input. That is how the legislation is structured. In such cases, ChemGes will make an educated and logical suggestion, taking the 'worst-case-scenario' approach.
- Our Programmers, Chemists and Transport experts have created a system for 'calculating' the transport classification based on the data of the preparation (classification, physical data,...) and the data or lack thereof of the individual raw materials, where clear formulae are not present in the legislation.
- We recommend that you review the transport classification output by ChemGes. Feel free to make changes to the transport classification and/or to the settings for transport, if these are based on sound data from another source.

- Further details about transport classifications in ChemGes, can be found in the manual located on the downloads page of our Website www.dr-software.com or accessible through the *Help* option in ChemGes (*General Help*).

2. Database

h. The database contains ca. 21,000 (CAS numbers) raw materials. In existence are 110 million CAS numbers.

- For a list of Raw Materials in our system, please refer to our Website www.dr-software.com.
- The classification of Raw Materials can vary greatly depending on supplier, country, tests,....

Sources of Raw Material Classifications:

- Official classifications output by various countries --- some of these are mandatory in their respective countries/areas (i.e. EU), while others are not. --- **These can be found in ChemGes.**
- Consistent classifications from major catalogues. --- **These can be found in ChemGes.**
- Supplier SDSs --- barring that there is not a mandatory official classification, and the supplier information is deemed reliable, it is permitted to base one's own Raw Material Information on that provided by the supplier. --- **These are not found in ChemGes, as they vary from supplier to supplier.**
- The ECHA database does not provide official classifications. These classifications are not reviewed and are compiled from many different dossiers. --- **These are not found in ChemGes and can be used at your own discretion.**

i. ChemGes does not contain any Preparations by default.

3. Preparations

j. Using interim preparations (one preparation as an ingredient in another)

- Be aware that the legislation requires the breakdown to always occur to the raw material level. Thus, it is not the data from the interim preparation that is used for the final preparation classification, but the data from the raw materials in the interim preparation.

4. SDSs

k. SDSs are created Country Specific.

- This means that they are:
 - **Not** language specific.
 - **Not** merely translations of one another.
- There are serious differences such as:
 - official language

- GHS implementation
- Substance Listings
- TLVs
- Required information

l. You are required to provide a country specific SDS, based on the country to which you are sending your SDS and, depending on the circumstances, all the countries through which your product travels.

m. If you generate an SDS for a country with a language that is not its official language, it is not a legal document and we cannot promise the translations of every text that applies to that country.

- For example, if you generate a Japanese SDS in English, the Substance Listing names will still appear in Japanese. They do not exist in English, are not to be used in English and thus are not translated into English by us.

n. ChemGes is not a translation software.

- Any text created by you, must also be translated by you.
- There is no software capable of providing acceptable and reliable translations, especially not when it comes to such highly technical terminology.
- We do provide translations of all phrases and headings that are in ChemGes, for the languages for which they are used.

o. We do not have every single substance list that exists, in our database.

- It is very easy to enter additional substance listings if so desired.

5. Printing

p. Printing a PDF

- In order to generate a PDF, simply follow the normal printing procedure and 'print' the document to a PDF writer as printer.

6. Email Support

q. In order to expedite support, please provide us with a clear explanation of your question and as much information as possible (screenshots are very useful).

- *If the question regards a classification, send us:*
 - the ingredients in the formulation with their percentages
 - the classification of the whole preparation
 - the information for the specific class, as shown in the quotient screen (access in the screen Maintenance of Preparations **[Page ↓ Quotients]**)
 - any other data that can be pertinent
- *if the question regards transport classification, send us:*
 - the ingredients in the formulation with their percentages

- the classification of the whole preparation
 - the transport classification of the whole preparation
 - any other data that can be pertinent
- *if something is not appearing as expected in the SDS, send us:*
 - the actual SDS
 - any other data that can be pertinent
- *If an error message occurs, send us:*
 - the exact wording of the error message
 - details as to when it occurs (i.e. steps taken, where it occurs,...)
 - ChemGes version number
 - anything significant that happened or was done before the error occurred (i.e. ChemGes stopped and shut off, update made, files moved, program was abruptly turned off, new installation, new module,...)

r. While our expertise is far reaching and thus our support, we are NOT legal consultants and thus not able to give you legal advice.

7. Updates

- With every major update, which is when we make our major changes, we publish an Update Description.
- It is highly recommended that you familiarize yourself with this Update Description.
- We always recommend a backup before every update and that you do not update the working version of your software until you have updated a secondary version in which you were able to see what the changes are and what impact they have. Such a secondary version can be generated by making a copy of the folder containing ChemGes, usually *Chem*, and placing it in a different location. Be sure to clearly name this version as your test version, so as not to cause any confusion.