**Sub-Committee of Experts on the Globally
Harmonized System of Classification
and Labelling of Chemicals
(Fifth session, 7-9 July 2003,
agenda item 2)**

First report of the inter-sessional Working Group on SDS

Draft Guidance document circulated by Australia on SDS

Comments by Germany

Comments by Germany on the draft Guidance document circulated by the Correspondence group on SDS and submitted to the fifth session of the SCE GHS under reference UN/SCEGHS/5/INF.6 are reproduced here after.

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I have read the comments by CEFIC, Belgium, JCIA and ICCA and found them all most helpful. I think nearly all proposals should be accepted an integrated into the paper. Especially the proposals made by Belgium and formulated as questions should be considered and worked out in detail.

Regarding Section 3 Composition /Information on Ingredients we definitely support the statements of ICCA. In addition to our view on the above cited comments we want to address some items, that are of special importance for us.

As think that SDS are especially a means to support safety at work we propose that Guidance in sections 7 "Handling and Storage" and 8 "Exposure Control/PPE" the should be specific and detailed for the product and its use.

Guidance should refer to the "Recommended use ..." as given in point 4.1.4 and make reference to sector specific or industry specific guidance where applicable. This should be added to the introductory sentences of sections 7 and 8.

Sections 9, 10,11 and 12 provide the data on which guidance in other sections is based. This is most important for substances. For mixtures however these data will not have been determined in most cases.

SDS should be as clear and relevant for the user of SDS (aiming at safety in the workplace!).

Therefore we think, that it is not wise to give the data for all (or even all hazardous) ingredients of a mixture, if data for the mixture itself are not available. Instead, compilers of SDS should be given the flexibility and responsibility to give data only for the most relevant components of a mixture if they cannot provide data for the mixture itself.

There are few suggestions I would not tend to accept, these are:
CEFIC on:
4.8.2.1
4.8.2.2
4.11.3.1
4.16.1.a
JCIA on:
4.1.3.1
4.3.6.1
4.16.1

ICCA (new version) on:
4.2.1
4.6.2

Eva Lechtenberg-Auffarth
Federal Institute for Occupational Safety and Health

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