

UN/SCEGHS/5/INF.6/Add6

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Draft Guidance document circulated by Australia on SDS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 the Japan Chemical Industry Information (JCIA)

Comments by JCIA on the draft Guidance document circulated by the Correspondence group on SDS and submitted to the fifth session of the SCE GHS under reference UN/SCEGHS/5/INF.6 are shown in the present document .

JCIA Comments on
GUIDANCE DOCUMENT ON THE PREPARATION
OF SAFETY DATA SHEETS (SDS)

General comments: There are many descriptions in the draft that are different from those in ISO 11014-1, which had been implemented in many countries including developing countries. After tremendous efforts, ISO 11014-1 has been gradually settled in most of countries, and then the GHS version is emerging. It would be recommended to minimize the discrepancies between the GHS-SDS and the ISO-SDS to the extent feasible in order to enable the introduction of the GHS as smooth as possible. Further, too much description in the Guidance Document would restrict the flexibility of the preparation of SDS to be suitable for the country/region where the SDS is applied.

Individual comments:

Amended text in each section is expressed with the mark as follows;

➤ XXXXXXXX.

Text in brackets as (XXXXXXXX) is the explanation of amendment or reason for the amendment.

3.2.1

Table 1: Cut-off/values concentration limits

➤ **Table 1: Cut-off values / concentration limits**

3.5.2 The SDS may also contain additional information. Where a material has additional relevant and available information about its nature and/or use, that information should be included.

➤ available information about its nature and/or use, that information **may** be included.

4.1.3.1 The substance or mixture may also be identified by alternative names, numbers, company product codes, or other unique identifiers. Provide other names or synonyms by which the substance or mixture is labelled or commonly known, if applicable. ~~For substances or mixtures that present a physical hazard, the UN Proper Shipping Name, as identified in the UN~~

~~Recommendations on the Transport of Dangerous Goods⁺, should be provided in this subsection if it has not appeared as the GHS product identifier.~~

(Move this description to 4.14. Otherwise it would cause confusion since concept of dangerous goods transportation could be introduced for identification of the product.)

4.1.4.1 Provide the recommended or intended use of the substance or mixture and indicate any restrictions on use.

- 4.1.4.1 Provide the recommended or intended use of the substance or mixture and indicate any restrictions on use **if applicable**.

(There may be cases that specific use can not be identified for such products as basic industrial chemicals.)

4.1.5.1 Provide the name, address and phone number of the supplier, including emergency phone number. Companies should include references to emergency information services on their SDS.

- including emergency phone number **if applicable**.

(There may be cases that suppliers of SDS are not able to meet the provision of emergency phone number.)

Non-Hazardous substances/mixtures

An SDS is a well-accepted and effective method for the provision of workplace information, and may be used to convey

(Move this description to 1.3 as "note" because it relates to the application. It would not be appropriate to describe here about the product for which preparation of SDS is not required.)

4.3.1.1 Substance

- Common name, synonyms.
 - Common name, synonyms,**etc**

 - CAS number, ~~EC number~~.
-

- CAS number ,etc

4.3.4.1 The Chemical Abstract Service (CAS) Registry Number should be provided where available. Chemical Abstract Service Registry Numbers provide a unique identification. ~~The European Communities (EC) Number should also be provided where available.~~

- National and/or regional registry numbers may also be provided where available.

(Since this is the UN guidance paper, it should be more appropriate to provide with the number used in the laws of the country/region where the SDS is applied.)

4.3.6.1 Provide the chemical identity and concentration or concentration ranges of all ingredients which are hazardous within the meaning of the GHS and are present above their cut-off levels.

- which are hazardous within the meaning of the GHS and are present above their cut-off levels, where appropriate.

~~4.3.6.3 Ranges to be used are:~~

~~(a) 60%~~

~~(b) 30-60%~~

~~(c) 10-30%~~

~~(d) <10%~~

- DELETE

(Description of percentage or its range should follow regulatory requirement where applicable. This description would give confusion in such a case that 50%-70% is preferable. This section may not be necessary at the outset.)

4.4.2.1 Provide first aid instructions by relevant routes of exposure. Use subheadings to indicate the procedure for each route (e.g. inhalation, skin, eye, and ingestion). ~~Describe expected immediate and delayed symptoms.~~

4.4.3.1 Provide information on the most important symptoms/effects, acute and delayed, from exposure.

4.4.4.1 Provide information on any medical and special treatments. For example, clinical testing and medical monitoring for delayed effects, specific procedures, details on emesis or

lavage, antidotes, contraindications. Specific antidotes should be indicated where they are available. ~~Describe the most important symptoms caused by exposure, whether acute or delayed.~~

➤ DELEAT

(Important symptom is already described. Additional description in 4.4.2.1-first aid measures and in the last part of 4.4.4.1 results in the description on expected symptom as many as three times.)

4.5.4.2 Provide information on ~~protective clothing to be worn by~~ fire fighters. ~~For example, boots, overalls, gloves, equipment and breathing apparatus.~~

➤ Provide information on **appropriate protective equipment for** fire fighters.

(Boots, overalls and gloves sound too general. It would be too much for the drafter of MSDS to prescribe the detail of fire fighting. Protective goods should be selected depending on the product.)

4.6 SECTION 6 - ACCIDENTAL RELEASE MEASURES

Recommend the appropriate response to spills, leaks, or releases in order to prevent or minimise the adverse effects on persons, property and the environment in this section.

Spill Volumes

~~In 4.6.4, distinguish between responses for large and small spills where spill volume impacts significantly on the hazard, the~~

➤ **4.6 SECTION 6 - ACCIDENTAL RELEASE MEASURES**

Recommend the appropriate response to spills, leaks, or releases in order to prevent or minimise the adverse effects on persons, property and the environment in this section.

Distinguish between responses for large and small spills where spill volume impacts significantly on the hazard.

(Since this is important description, the text should be moved here.)

4.7.2.1 Provide advice that:

(a) minimises contact between the worker and the substance;

- (b) prevents handling of incompatible substances; and
- (c) minimises the release of the substance to the environment.

➤ (d). protect fires and explosion

(It is better to add the description of explosion prevention.)

Consistent Advice

~~Ensure that the advice provided is consistent with the physical and chemical properties in Section 9.~~

➤ DELETE

4.8.2.2 Where available, list the biological limit values, including notations, for a substance and for each of the ingredients of a mixture. Where possible, the biological limit value should be relevant to the countries or regions in which the SDS is being supplied. The source of the biological limit value should be stated on the SDS. When listing biological limit values, use the chemical identity as specified in section 3 of the SDS. If there is no biological limit value allocated, then the SDS should state that there is ‘no biological limit value allocated’.

(It is difficult to understand what “biological limit values” mean. Examples should be shown. Drinking water standard of WHO might be an example.)

(Since the biological limit values may not be set-up in many cases, it would not be appropriate to describe this section in the same manner as occupational exposure limits in section 4.8.2.1. One of the approach would be to only describe, “Where available, list the biological limit values, including notations, for a substance and for each of the ingredients of a mixture.” in this section and to delete the rest.)

Special Requirements for PPE

See also Section 5 of the SDS for specific fire/chemical PPE advice.

Special requirements may exist for gloves or other protective clothing to prevent skin, eye or lung exposure. Where relevant, this type of PPE should be clearly stated. For example, 'PVC gloves' or 'nitrile rubber gloves'.

Special requirements may exist for respirators. ~~Vague information such as 'use face mask' is not acceptable whereas 'use half face filter respirator suitable for organic vapours' would be acceptable.~~

➤ **DELEAT**

(It is good to describe this in the text box which will be helpful. However, the description of the deleted part sounds a bit overstated and might make a drafter feel uneasy about the SDS prepared.)

4.9.1.1 Clearly identify the following properties and note if specific characteristics do not apply, are not available or are irrelevant.

(This description reads that the information on all of the listed properties should be entered if available. It is preferable that there is a choice of deletion of the particular property, and description of “not available” etc. under the description of the property where the information is, e.g., not available.)

4.9 SECTION 9 - PHYSICAL AND CHEMICAL PROPERTIES

Describe the empirical data of the substance in this section.

Provision of Physical/Chemical Information

The data included in this subsection should apply to the substance or mixture as used at work. If the product is a mixture, the physical data should describe the mixture or formulation. If that information is not available the physical/chemical properties of the ingredients should be provided.

➤ **4.9 SECTION 9 - PHYSICAL AND CHEMICAL PROPERTIES**

Describe the empirical data of the substance in this section. **The data included in this subsection should apply to the substance or mixture as used at work. If the product is a mixture, the physical data should describe the mixture or formulation. If that information is not available, the physical/chemical properties of the ingredients should be provided.**

(Since the description in the text box is important, it is recommended to move here.)

Availability of Data

If data for mixtures are not available, ingredient data should be provided.

~~In determining incompatibility, consider the substances, containers, and contaminants that the substance might be exposed to during transportation, storage and use.~~

➤ **DELETE**

(This restriction should not be imposed.)

4.11.6.1.1 General statements such as ‘toxic’ with no supporting data or ‘safe if properly used’ are not acceptable as they may be misleading and do not provide a description of health effects. Phrases such as ‘not applicable’, ‘not relevant’, or leaving blank spaces in the health effects section can lead to confusion and misunderstanding and should not be used.

(Example of the cases of ‘not applicable’ and ‘not relevant’ should be included.)

4.11.6.8.1 ~~All~~ information on adverse health effects should be included even when not required by the GHS classification criteria

➤ **Other relevant** information on adverse health effects should be included even when not required by the GHS classification criteria

4.12.2 Ecotoxicity

4.12.3 Persistence and degradability

(Description in this section is too much detailed as compared to description in other sections. Re-writing is recommendable in consideration of the balance with other sections.)

4.16.1 Minimum information requirements

• Other information including information on preparation and revision of the SDS including:

~~(a) the date of preparation or last revision of the SDS;~~

- (a) a key/legend to abbreviations and acronyms used in the SDS;
- (b) literature references; and
- (c) sources for data.

(The date of preparation or last revision of the SDS is better to appear in the front page than in 4.16.1.)

Preparation and Revisions

~~When revisions are made to an SDS, clearly indicate where the changes have been made to the previous version of the SDS, with an explanation of the changes.~~

➤ DELETE

(Explanation on the reason for the revision may help comprehend the risk of the product but it is not always the case. It will not be appropriate to apply this to all the cases.)