

UN/SCEGHS/6/INF.8

**Sub-Committee of Experts
on the Globally Harmonized System of Classification
and Labelling of Chemical
(Sixth session, 10-12 December 2003)
(agenda item 3)**

**Report of the Informal Correspondence Group on Safety Data Sheets
Meeting: Tuesday 9 December 2003
Lead Country: Australia**

The informal inter-sessional correspondence group of the SCEGHS met in Room C3 of the Palais des Nations from 13.30 h to 16.00h on Tuesday 9 December 2003. The group reconvened from 11.30h – 13.30 on Wednesday 10 December to continue their deliberations.

The Chair made a number of opening remarks on the content and format of the draft document for the information of the participants. The following points were raised:

- The first draft of the guidance document was revised following discussions of the correspondence group and the UNSCEGHS in July 2003. A teleconference was held with a smaller drafting group of the correspondence group, as agreed at the July meeting. On the basis of the comments provided by the drafting group, a number of changes were made to the draft document. These changes are outlined in the document UN/SCEGHS/6/INF.1
- The document has been drafted on the understanding that it is to be a “stand-alone” document, as agreed at the previous meeting, and thus the definitions and foreword from the GHS document have been reproduced in the document.
- The deadlines for formal papers for the July and December 2004 UNSCEGHS meetings have been posted on the UN website. The work of the correspondence groups must be completed by the end of the biennium, that is December 2004.
- If major changes to the draft SDS document are not required following this December 2003 meeting, Australia intends to finalise editing of the SDS draft by April 2004. This will allow the revised draft to be provided to the UNSCEGHS meeting in July 2004 as a formal document for consideration.
- Participants were given the opportunity to make comments on the overall draft SDS document at the beginning of the meeting. Comments on specific sections of the document were addressed in section order during the meeting.

The group discussed a number of general issues. These included:

- Whether information that is provided in the GHS document should be repeated in the SDS guidance document. Members discussed the Definitions section. If the document is to be produced as an electronic document only, the definitions would automatically be updated in line with changes to the GHS documents. In this case, the definitions section of the SDS document should be retained.
- If the SDS guidance is to be produced in hard copy, some members considered that the definitions section should be removed from the SDS document, and reference be made to the definitions in the GHS documents. This is to ensure that the definitions used remained current and consistent with the GHS. This issue will be referred back to the correspondence group for further discussion.
- Some members commented that there should be more emphasis given to the environmental issues, as most of the emphasis is currently on human health and safety issues.
- A number of members requested that changes be made to some headings, definitions, and minimum information requirements for the SDS. However, this would require the SDS guidance to deviate from the GHS document, and the group agreed that any such proposed changes should be referred to the UN SCEGHS secretariat, for consideration by the subcommittee at the time that the GHS document is next revised.

In editing the draft document, a range of changes and clarifications were agreed by the group. A number of issues, however, remain undecided and further discussion will be required by the correspondence group. These include the following:

- The Scope and Application of the guidance document (Section 1.2 and 1.3) was raised as an issue by some members. A number of members have requested that a considerable number of references be made to the requirements of national and/or regional competent authorities. For example, regulatory authorities may require SDS for substances or mixtures that would not be classified as hazardous using the criteria of the GHS. It has been proposed that the guidance material be amended to include reference to such national/regional requirements. The UNSCEGHS and/or correspondence group should discuss this further. Paragraph 4 in the Preface addresses the point that the use of the SDS Guidance will depend on how it is implemented by national and/or regional authorities.
- Following further discussion on this issue, the group agreed to draft text for the beginning of Chapter 4, identifying that the Chapter outlines the minimum information requirements of the GHS, but that additional information might be required by national competent authorities.
- Section 4 deals with Chapter 11 of the SDS guidance, namely the provision of toxicological information. This is the area in the SDS where there are considerable problems in the quality and usefulness of information provided in the SDS. It was also the area where the correspondence group agreed that the most guidance and advice was required.
- In Section 4.1 there was no agreement on what constituted “Emergency contact details”. This issue will be discussed further by the correspondence group.
- In Section 4.2, there is a requirement to provide a description of the hazards of the substance and/or the mixture. Some members have requested that the guidance document should require information on the hazards of the individual ingredients of a mixture. This appears largely to satisfy specific national or regional requirements for hazard information. Other members did not agree to the requirement to provide such ingredient specific hazard information. This issue will be discussed further by the correspondence group
- In Section 4.3, members agreed that there should be more flexibility in the requirement to provide concentration ranges for ingredients. Some members requested that information could be provided in order of hazard and not just in the proportion of ingredients. This issue requires further discussion in plenary or by the correspondence group.
- In Section 4.3, some members also felt that the section was intended solely for ingredients in mixtures, and not for substances. There was no consensus on this issue, and the correspondence group will consider this point at a later date.
- Section 4.8 on Control Parameters will be revised to include an introductory paragraph with explanation of what constitutes such parameters.
- Some members requested changes to the parameters in section 4.9, and/or the provision of additional guidance on the type of information required for this section.
- Section 4.11 was drafted to provide detailed advice to authors of SDS on the construction, format and content of Chapter 11 in the SDS. During discussions in the correspondence group meeting, there was a considerable number of issues raised. To address these issues, this section will be redrafted in consultation with the correspondence group and/or a smaller drafting group, to refine the text and provide clear guidance on the requirements for Chapter 11 of the SDS.
- Section 4.12, dealing with the information requirements on environmental hazard, will be redrafted by the correspondence/drafting groups, to make it more consistent with the approach taken in other sections.

The lead country agreed to liaise with the members of the correspondence group to revise the text and to circulate the revised version in 2004, with the aim of having the 3rd draft available to the UNSCEGHS as a formal paper for the 7th meeting of the sub-committee in July 2004.