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**COMMITTEE OF EXPERTS ON THE TRANSPORT OF
DANGEROUS GOODS AND ON THE GLOBALLY
HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

Sub-Committee of Experts on the Globally
Harmonized System of Classification
and Labelling of Chemicals

Twelfth session, 12(p.m.)-14 December 2006
Item 3 (d) of the provisional agenda

HAZARD COMMUNICATION ISSUES

Miscellaneous proposals

Safety Data Sheets

Transport information for substances carried in bulk according to IMO Convention
MARPOL ANNEX II

Transmitted by the expert from the United Kingdom

Background

1. Paragraph 1.1.1.6 (c) of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) outlines the aims of a Globally Harmonized System and states the relevance to the means of transport. Annex 4 gives guidance on the preparation of Safety Data Sheets (SDSs) and more specifically Section 14 (Transport information) which outlines the information pertinent to transport.

2. Bulk liquid chemical products offered for maritime transport are regulated in accordance with Annex II – regulations for the control of pollution by noxious liquid substances to IMO's International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto (MARPOL 73/78) or in short form "Annex II to MARPOL 73/78 and IMO's "International Code for the Construction and Equipment of Ships carrying Dangerous Chemicals in Bulk" in short form known as the "IBC Code". It should be

noted that such transport is specifically not addressed in the UN Model Regulations on the Transport of Dangerous Goods.

3. The purpose of an SDS is to provide information on the potential health effects of exposure and give guidance on how to store, handle and respond to emergency situations. However even though an SDS accompanies a bulk liquid product when offered for shipment, the sub-paragraphs in Section 14 of Annex 4 appear to only reflect the requirements for cargoes carried in accordance with the UN Model Regulations (i.e. not including bulk transport by sea). As a result, the following proposal is made.

Proposal

4. Annex 4 guidance on the preparation of safety data sheets (SDS), to add a new paragraph to Section 14 as follows:

“A4.3.14.7 Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

This section only applies when cargoes are carried in bulk according to the following IMO instruments: Annex II of MARPOL 73/78 and the IBC Code (International Code for the Construction and Equipment of Ships carrying Dangerous Chemicals in Bulk).

Provide the product name (if name is different to that given in A4.3.1.1) as required by the shipment document and in accordance with the name used in the lists of product names given in chapters 17 and 18 of the IBC Code or the current version of the IMO’s MEPC.2/Circular. Provide also ship type and pollution category.”
