

## 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

6 December 2016

### Thirty-second session

Geneva, 7 – 9 December 2016

Item 3 (c) of the provisional agenda

**Hazard communication issues: miscellaneous**

## **RPMASA request to clarify if numbering and /or not numbering of SDS subheadings is acceptable to all Countries regulations?**

### **Transmitted by the Responsible Packaging Management Association of Southern Africa (RPMASA)**

1. RPMASA have noted a lack of consistency in presentation of information in SDS from different Countries. Of particular concern is the different approaches to number or not number the subheadings in the designated 16 sections. This has been raised with several South African exporting companies over the last few months, which we would not like to see become an impediment to trade.

2. RPMASA requests the experts to advise what the requirements for numbering or not of SDS subheadings are in their country/s, and if both SDS with numbered sub headings and those that are not numbered are acceptable in all Countries?

3. The requirements for compilation of Safety Data Sheets are given in Chapter 1.5 and Annexure 4 of the UN GHS 6th revision, as well as in ISO 11014: 2009 Safety data sheet for chemical products - content and order of Sections.

4. The UN GHS Purple Book does not mention numbering of the subheadings, but table 1.5.2 shows them with a) b) c) etc for the subheadings. It also states that the order of the physical and chemical properties in Section 9 may be followed, but, is not mandatory! Annexure 4 Guidance on the preparation of SDS does not mention numbering of subheadings

5. Many Countries use the ISO 11014 Standard to compile SDS and it is referenced in the UN GHS Purple book. It has been adopted in South Africa as SANS 11014: 2010 through a mirror committee.

6. ISO 11014: 2009 clearly states in Section 5 that:

“An SDS shall provide the following 16 document headings and relevant information about a chemical product. Text, headings and numbering shall not be altered.

After the List of 16 headings it goes on to say:

“These 16 sections may be subdivided by means of subheadings. However, the subheadings shall not be numbered.”

7. It has been noted that SDS from the EU have numbered subheadings and it is understood that REACH requires numbering of subheadings.

8. Some SA Companies have recently been asked by Companies in the EU why they are not numbering the subheadings, raising a concern that SDS without numbered subheadings may be rejected when exporting to certain Countries.

## Proposal

9. RPMASA asks the Members of the Sub Committee to consider and advise –
    - (a) if there is a legal requirement for numbering of subheadings in other Countries and Regions who have adopted the GHS into their Regulations?
    - (b) if All Countries will accept SDS from other Countries both with numbering as in the EU and without numbering as per ISO 11014?
    - (c) if Members feel there is a need for standardisation of a single format for SDS across All Countries globally, and if so how should this be addressed?  
Possibly-
      - i) in the coming 7<sup>th</sup> revision of the UN GHS Purple Book?
      - ii) through revision of the ISO 11014 Standard?
      - iii) by what mechanism?
  10. RPMASA would appreciate the Sub Committees consideration, comments and proposed way forward to prevent any possible delays in trade through rejection of otherwise GHS compliant SDS?
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