

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

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OTHER BUSINESS

Documenting changes in the GHS document

Transmitted by the expert from the United States of America

1. The text of the GHS reflects international consensus based on many years of expert analysis and compromise, often involving painstaking attention to what might seem to be minor details. It is also the product of many committees, working over a number of years, and therefore there is opportunity for technical inconsistencies to arise that should be corrected or clarified. Often, Sub-Committee member experts or the Secretariat will identify such issues for resolution by the Sub-Committee.
2. The practice in the GHS Sub-Committee has been to make changes in the GHS based on the submission of working papers in time for participants to review them in advance of meetings, even if the proposed changes appear to be minor technical and conforming changes. In addition to protecting against unintended consequences, this process ensures that there is a documented and transparent record for all changes to the system. Any person seeking to understand the reason for changes can find documentation in the papers filed for the UNSCEGHS meetings and the meeting reports.
3. At the conclusion of the biennium the Secretariat compiles a document that details all of the changes in the GHS document, which is approved by the Sub-Committee and appended to its report. This is a very valuable resource in documenting the development of the GHS and ensuring transparency and the wide availability of up-to-date information.
4. Recently, stakeholders brought to our attention an instance where some minor changes to the GHS text appear to have been made without documentation in the record.
5. The stakeholders who identified the issue to us are GHS trainers who were updating their training materials. Other, less careful and meticulous trainers may not have checked the GHS

document so closely, and as a result their training materials may no longer be complete and accurate.

6. We do not have a substantive objection to these changes, which had the effect of improving consistency between the GHS text in Chapter 1.5 and guidance adopted as part of Annex 4 on Safety Data Sheets. We simply believe they should be documented to maintain transparency and ensure that they are not overlooked by users of the GHS document.

7. The purpose of this paper is to document these particular changes, as described in the Annex.

8. We would also like to re-affirm the need for transparency and documentation of all changes in the Purple Book text in the future, through the process of filing papers that are posted on the UNECE website, considered by the Sub-Committee, and included in meeting reports of the UNSCEGHS, especially in the end-of-biennium compilation of changes which may be relied upon by users of the GHS pending the availability of a revised edition.

Annex

Table 1.5.2, Minimum information for an SDS, has been revised, consistent with the guidance contained in Annex 4 (which was adopted after the original text of Chapter 1.5 was approved), as follows:

1. In Section 9, to specify “(r) Viscosity.” as a mandated physical and chemical property
2. In Section 10, to add “(a) Reactivity” to the list of minimum information required
3. In Section 14, to add “(f) Transport in bulk (according to Annex II of MARPOL 73/78 and the IBC Code);”
4. In Section 14, to delete “Marine pollutant (Yes/No).” and insert “(e) Environmental hazards (e.g.: Marine pollutant (Yes/No));”
