

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

23 June 2010

Nineteenth session

Geneva, 30 June–2 July 2010

Item 4 (c) of the provisional agenda

Implementation issues:

Cooperation with other bodies or international organizations

Promoting Safety Data Sheet consistency across sectors: proposed cooperation with the International Maritime Organization (IMO)

Transmitted by the expert from the United States of America

I. Background

1. At its 18th session, Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals decided to request the establishment of a joint correspondence working group with the IMO to promote greater consistency in safety data sheets (SDSs). IMO responded by way of a working paper ST/SC/AC.10/C.4/200/4 (IMO), Consideration of issues relevant to Safety Data Sheets (SDSs), submitted to the 19th session of the GHS Sub-Committee by the IMO Sub-Committee on Bulk Liquids and Gases at its fourteenth session (BLG14). In this paper, the Sub-Committee on Bulk Liquids and Gases formally notified the GHS Sub-Committee that consideration of the MSDS requirements for Annex I Cargoes and Marine Fuel Oils has been finalized and subsequently deleted from its program of work and agenda. Therefore, it is not possible to consider the GHS Sub-Committee's request for a joint correspondence group to address the differences between the MARPOL Annex I MSDS content recommendations for oil cargoes and marine fuel oils and the GHS SDS requirements.

2. The U.S. delegation believes greater consistency is still worth pursuing in the SDS provisions established by IMO and in the GHS. The IMO Sub-Committee on Bulk Liquids and Gases cannot initiate new work (or establish terms of reference for a new working group) unless it is on the program of work/agenda established by either the IMO's Marine Safety Committee (MSC) or Marine Environmental Protection Committee (MEPC). Being a safety issue, the MSC would be the appropriate committee to task the IMO's BLG Sub-Committee.

II. Proposal

3. The U.S. delegation suggests that the GHS Sub-Committee send a letter to the IMO's MSC. This letter should request that the IMO's MSC place the SDS issue back on the working agenda with the intention of resolving the differences between the MARPOL Annex I MSDS content recommendations for oil cargoes and marine fuel oils and the GHS provisions for SDS format and contents. The letter to the IMO committee may also

recommend that, in the interest of promoting harmonization across all sectors, a joint correspondence working group be formed to resolve these differences. Members of the joint working group would be composed of both IMO's BLG Sub-Committee and GHS Sub-Committee members. A similar procedure was used to review issues of common interest and work to avoid inconsistencies with policies being developed under the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

4. The U.S. delegation has also clarified that the next IMO's MSC meeting is planned for the first two weeks of December 2010. At this meeting, the IMO committee will establish the working activities for the 2012 biennium. Therefore, the U.S. delegation recommends that this letter be sent in sufficient time that it can be placed on the IMO Committee meeting agenda.
