



---

**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****Thirty-second session**

Geneva, 7-9 December 2016

Item 3 (c) of the provisional agenda

**Hazard communication issues:  
miscellaneous****Amendments to Annex 4 (sub-section A4.3.17.7) of the GHS  
on guidance on the preparation of safety data sheets****Transmitted by the International Council on Mining and Metals  
(ICMM)<sup>1</sup>****Introduction**

1. Annex 4 of the GHS contains “*Guidance on the preparation of safety data sheets (SDS)*”. This includes general guidance on structure and content as well as specific information relating to content.

2. Subsection 14.7 (A4.3.14.7) “*Transport in bulk according to Annex II of MARPOL 73/78 and the IBC code*” was added to the SDS model in GHS Rev.2 (2007). The guidance notes that:

*“This sub-section only applies when cargoes are intended to be carried in bulk according to the following IMO instruments: Annex II of MARPOL 73/78 and the IBC Code”.*

3. This section is therefore limited in scope to liquids and does not apply to other forms of cargo that are transported in bulk under similar regulation. For instance, the IMO’s International Maritime Solid Bulk Cargoes (IMSBC) Code entered into force on

---

<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2015-2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15)

1 January 2011, from which date it was made mandatory under the provisions of the SOLAS Convention. Similarly, for gaseous cargoes there is the IMO International Code for the Construction and Equipment of Ships Carrying Liquefied Gases in Bulk (IGC Code), and for older carriers, the Code for the Construction and Equipment of Ships Carrying Liquefied Gases in Bulk (CG Code) and Code for Existing Ships Carrying Liquefied Gases in Bulk (eGC Code).

4. As the nature of information provided in an SDS can be useful for transport under both IMSBC and IGC codes, we encourage the Sub-Committee to consider updating the section heading for A4.3.14.7 along with the accompanying guidance. This would make that section of the SDS relevant to all bulk cargoes transported under IMO instruments.

5. Changing the name of subsection 14.7 to “Transport in bulk according to IMO Instruments” would mean that information related to bulk transport could be covered under this single section of the safety data sheet regardless of the physical form of the cargo. Simplifying the name of the subsection would also make it more consistent with other subsection names and general GHS requirements.

6. Where a particular substance is not transported in bulk, this could simply be stated in subsection 14.7.

7. A discussion of the above was first tabled by ICMM at the second joint session of the TDG and the GHS sub-committees held on 5 July 2016. Participants discussed the issue described above and reviewed an initial suggestion for potential amendments as set out in informal document INF.7 (GHS) - INF.28 (TDG). Taking into account the largely positive feedback on that paper, and noting advice to limit the scope of the amendment to transport under IMO instruments, the following proposal is submitted for formal consideration.

## Proposal

8. In Annex 4, heading of subsection A4.3.14.7:

Replace “*Transport in bulk according to Annex II of MARPOL 73/78<sup>9</sup> and the IBC code<sup>10</sup>*” with “*Transport in bulk according to IMO Instruments*”.

Consequential amendment: In Chapter 1.5, Table 1.5.2, amend row 14 (f) accordingly.

9. In Annex 4, subsection A4.3.14.7, first paragraph:

Replace “*This sub-section only applies when cargoes are intended to be carried in bulk according to the following IMO instruments: Annex II of MARPOL 73/78<sup>9</sup>, the IBC code<sup>10</sup>*”.

with:

“*This sub-section only applies when cargoes are intended to be carried in bulk according to IMO instruments: e.g., Annex II or Annex V of MARPOL 73/78<sup>9</sup>, the IBC code<sup>10</sup>, the IMSBC code<sup>11</sup> and the IGC code<sup>12</sup>*”.

10. Insert the following footnotes:

<sup>11</sup> **IMSBC Code** means the *International Maritime Solid Bulk Cargoes Code, as amended*.

<sup>12</sup> **IGC Code** means *The International Code of the Construction and Equipment of Ships Carrying Liquefied Gases in Bulk, as amended*.

11. Amend the beginning of the second paragraph under A4.3.14.7, which applies to liquids, to begin with the words “*For liquid substances*”, i.e.:

*“For liquid cargoes, provide the product name (if name is different... and pollution category”.*

12. Add the following new third paragraph under A4.3.14.7 to give guidance on the type of information that could be included for solid bulk cargoes as follows:

*“For solid bulk cargoes, provide the bulk cargo shipping name, whether or not the cargo is considered harmful to the marine environment (HME) according to MARPOL Annex V, whether it is a material hazardous only in bulk (MHB) according to IMSBC, and which Group it should be shipped under according to IMSBC.”*

13. Add the following new fourth paragraph under A4.3.14.7 to give information on the type of information could be included for gaseous bulk cargoes as follows:

*“For gaseous bulk cargoes provide the product name and ship type according to IGC (or earlier versions eGC and CG)”.*

## **Summary**

14. The subsection name change and additional guidance would assist both the safety data sheet author and the user as the information on bulk transport could be found in the same subsection of the safety data sheet for all physical forms.

---