

UN/SCEGHS/5/INF.6/Add3

**Sub-Committee of Experts on the Globally
Harmonized System of Classification
and Labelling of Chemicals**
(Fifth session, 7-9 July 2003,
agenda item 2)

First report of the inter-sessional Working Group on SDS

Draft Guidance document circulated by Australia on SDS

Comments by South Africa

Comments by South Africa on the draft Guidance document circulated by the Correspondence group on SDS and submitted to the fifth session of the SCE GHS under reference UN/SCEGHS/5/INF.6 are presented in the present document .

COMMENTS: DRAFT GUIDANCE DOCUMENT ON THE PREPARATION OF SAFETY DATA SHEETS (SDS)

Submitted by the Expert of South Africa

General

- a) The concept of having such a guidance document on the preparation of SDSs is supported.
- b) The guidance document should be a user-friendly stand alone document for use by industry and should be easily accessible at low cost and on the web. However, it should be a document which goes beyond the wording of the "Purple Book"; currently the document is mostly a cut and paste from various sections. It needs to be further unpacked to provide sound useful accessible guidance to assist in the preparation of SDSs.
- c) Readers should be assisted with information where to obtain the necessary information. This is particularly important for developing countries, which do not necessarily have in-country experience to develop the information.
- d) Industry should be given adequate time for transition to adapt the requirements of the guidance document.

PREFACE

Paragraph 3: Delete the second sentence and replace with: "Use of this document should result in the preparation of SDS that complies with the requirements of the GHS"

Paragraph 4:

a) We are not sure about the meaning of the first sentence. "Adoption" implies that it will be a national legal document. We do not believe this is appropriate. As countries require SDSs to be prepared in terms of the GHS, the guidance document will be used by industry.

b) We propose that the second sentence be deleted and replaced by: " The document is intended to be used by anyone who prepares an SDS in terms of the GHS requirements."

1.3.1 This section should be redrafted to reflect that countries may adopt slightly different approaches and that the guidance document is intended to deal with the preparation of the SDS itself rather than the regulatory aspects that are discretionary in terms of the GHS.

CHAPTER 2: Definition of flammable liquid:

It should be stated whether the flash point of 93 °C is for open cup or closed cup. Clause 2.3.1.2 of the UN Recommendations defines a flammable liquid having a flash point of not more than 60,5 °C closed cup and not more than 65,6 °C open cup. This needs to be clarified.

3.1.1, last sentence: We suggest that "procedures" be replaced by "response measures". Procedures are more elaborate and detailed than one would expect to see in an SDS.

3.2 We propose that a new clause 3.2 be inserted as indicated below and that the consequential clauses be renumbered accordingly.

Circumstances under which an SDS must be provided: We suggest wording here to reflect that the compiler of an SDS must check the circumstances under which the national legislation requires an SDS to be provided in line with the discretionary provisions set out in the GHS.

Table 1: The use of this table needs to be explained.

3.2.2 This document should stand alone (see general comment (a)). Any reference to the GHS document should then be paraphrased or explained as appropriate .

3.2.3 We suggest that:

a) "chronic toxicity" be added after "acute toxicity".

b) the following be added at the end of the clause: " Writers are advised to check this requirement with their national regulator."

3.2.4 At the end of the sentence add "as for 3.2.3".

3.3.1 We are strongly in favour that "Composition/information on ingredients" be moved to Section 2 as in ISO 11014-1. The ISO format is implemented in many countries and this (to us, unnecessary change) would create a major editing of existing SDSs.

4.1.2 If there is only one subclause it need not be numbered. We suggest that this convention be followed through out the document.

4.1.2.1 The label cannot be used as the primary source of information; the label must be generated from the SDS . The wording needs to clarify this. It should also be stated that the product name on the SDS must be the same as the one used on the label.

4.1.3 Why is only physical hazards required?

4.1.4 We suggest that examples be given to explain what is meant by "restrictions of use".

4.1.5.1 a) We propose that the clause be amended to read: " ... of the supplier, manufacturer, importer or distributor ..."

b) The clause needs to clearly state that the emergency phone number should be that of the company in the country where the product is sold, and not that of the country of origin (if imported). It should be stated that the phone should be answered within a reasonable time, and provide access to relevant information. Furthermore, the number must be answered 24h/day; 7 days of the week

c) **Last sentence:** Please explain the meaning. Is this not what the emergency phone number is for?

4.2.1, bullet 2: The use of the GHS pictograms for precautionary statements should be included.

4.3.6.4 We suggest that the clause be changed to read: " .. hazard effects should be those applicable to the upper limit of the range."

4.4.2 (d): The most important issue here is to seek medical attention and for the doctor to be informed as to what the hazard is . We feel that the clause should reflect this.

4.8.4.1(b): Should this not perhaps read "maintain air concentrations below *occupational exposure limits*"?

4.11.1 We suggest that bullet 4 be deleted and bullet 1 be amended to read: ".... (acute oral, dermal and inhalation toxicity) and the numerical measures of toxicity applicable for each route of exposure."

4.12.5.1 Give reference to the methodology for the prediction of leaching and mobility from models.

4.13.2.1 The clause should reflect that national legislation should be consulted in this regard.

14.16.1 a) Indicate whether the name of the compiler should be given with the date of preparation or last revision.

b) Disclaimers are often included in this section. We feel that the document should give guidance on the inclusion (or not) of disclaimers.
