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**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

Tenth session, 7-9 December 2005
Item 2(d) of the provisional agenda

**UPDATING OF THE GLOBALLY HARMONIZED SYSTEM FOR CHEMICAL HAZARD
CLASSIFICATION AND COMMUNICATION (GHS)**

Comments on ST/SG/AC.10/30/Rev.1

Annex 4: Guidance on the preparation of Safety Data Sheets (SDS)

Transmitted by the International Technical Committee for the prevention and Extinction of Fire (CTIF)

CTIF proposes the inclusion of some amendments to the current guidance on the preparation of safety data sheets under the headings 5 (Fire-fighting measures) and 6 (Accidental release measures) because the SDS is the best source of information for emergency responders when dealing with incidents occurring at fixed facilities where information mandatory in transport is not available.

Proposal

1. Amendments to Section 5 – Fire-fighting measures: (New text is underlined)

A4.3.5.1 Amend as follows:

“Provide information on the appropriate ~~type of extinguishers or~~ fire-fighting agents. In addition, indicate whether any ~~extinguisher~~ extinguishing agents are inappropriate for a particular situation involving the substance or mixture.”

***Justification:** The information about the appropriate or inappropriate extinguishing agent (e.g. water, dry powder, carbon dioxide, etc.) is most important, rather than the type of application (e.g. with a fire extinguisher, a hose reel, etc.).*

A4.3.5.3 Amend the title as follows: “*Special protective ~~equipment and precautions~~ actions for fire fighters*”.

A4.3.5.3.1 Amend the first sentence as follows: “Provide advice on any ~~precaution~~ protective actions to be taken during fire-fighting.”.

A4.3.5.3.2 Delete this paragraph.

Justification: *Fire fighters have the task to extinguish the fire and therefore they have to act in an appropriate manner and not “only” be aware of the associated risks. The good example in the current text “keep containers cool with water spray” is obviously an action and not a precaution.*

2. Amendments to Section 6 – Accidental release measures:

A4.3.6.1 Insert the following new sub-paragraphs:

“A4.3.6.1.1 For non-emergency personnel

Provide advice related to accidental spills and release of the substance or mixture such as:

- (a) the wearing of suitable protective equipment (including personal protective equipment, see Section 8 of the SDS) to prevent any contamination of skin, eyes and personal clothing;
- (b) removal of ignition sources and provision of sufficient ventilation; and
- (c) emergency procedures.

A4.3.6.1.2 For emergency responders

Provide advice related to suitable fabric for personal protective clothing (e.g. “appropriate Butylene, not appropriate PVC”).”.

Justification:

Having in regard that although the primary use of the SDS is for workplace users the entries under this para is focused on self-protection;

Having in regard that SDS are providing valuable information also for emergency responders especially when dealing with incidents occurring at fixed facilities,

Having in regard that emergency responders very often are missing authorized information which is the best protective clothing material when dealing with a particular released chemical;

Having in regard that information about the permeation of the protective layer is not available from sources mandatory for transport;

Having in regard that SDS are drafted by manufacturers of chemical products who know best about the relevant properties;

With the suggested amendments SDS would have a substantial benefit for the safety of emergency responders while mitigating damage to people and the environment when chemical products are accidentally released.
