



**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-eighth session**

Geneva, 11-13 December 2019

Item 3 (d) of the provisional agenda

**Hazard communication:
other issues****Proposed clarification for the heading of section 9 of the
Safety Data Sheet****Transmitted by the experts from Australia and Canada*****Introduction**

1. The references to the heading of section 9 of the Safety Data Sheet (SDS) are not presented consistently throughout the GHS.
2. In Table 1.5.2 of the GHS and paragraph A4.2.3.1 of Annex 4 of the GHS, the text for the heading to section 9 of the SDS reads “Physical and chemical properties”, while the title of Table A4.3.9.1 of Annex 4 of the GHS (the table that outlines the minimum information that should be included on an SDS) reads “Basic physical and chemical properties”.
3. Additionally, paragraph 1.5.3.2.1 of the GHS reads “Physical and chemical properties and safety characteristics” and the title to section A4.3.9 (section 9) of Annex 4 of the GHS is “SECTION 9: Physical and chemical properties and safety characteristics”.
4. The question of whether “Physical and chemical properties” or “Physical and chemical properties and safety characteristics” is the proper heading to section 9 of the SDS has been raised as competent authorities prepare to align their regulations with the seventh revised edition of the GHS.
5. This variation in wording for the heading to section 9 of the SDS should be addressed to provide clarity. This is especially important to support compliance with competent authority requirements for jurisdictions where SDS headings are aligned with the GHS.

* In accordance with the programme of work of the Sub-Committee for 2019-2020 approved by the Committee at its ninth session (see ST/SG/AC.10/C.3/108, paragraph 141 and ST/SG/AC.10/46, paragraph 14).

Discussion

6. This variation was first introduced in the sixth revised edition of the GHS following a review by the informal correspondence group on the revision of section 9 of the SDS (see the Annex to this document for a comparison between GHS revisions in table format). This informal correspondence group aimed to clarify the type of data that is expected for each of the properties listed in section 9, and to improve the quality and consistency of section 9 of the SDS through revisions to Annex 4 of the GHS.
7. The conclusion of the review by the informal correspondence group was reported in ST/SG/AC.10/C.4/2014/21, and adopted, as amended by informal document INF.13, at the twenty-eighth session of the Sub-Committee (ST/SG/AC.10/C.4/56 paragraphs 42-43 and Annex I). This resulted in the introduction of three tables (Tables A4.3.9.1, A4.3.9.2 and A4.3.9.3) as well as new explanatory text in Annex 4. Table A4.3.9.1 outlines the minimum information that should be included on an SDS, while Tables A4.3.9.2 and A4.3.9.3 outline properties/safety characteristics that may be useful to communicate but are not required on the SDS. Consequential amendments to Table 1.5.2 were proposed and adopted to reflect the new ordering of properties in Table A.4.3.9.1, the addition, deletion and renaming of properties, as well as the inclusion of a footnote.
8. The text in paragraph 1.5.3.2.1 and the title to section A4.3.9 were changed at this time. Only the title for section A4.3.9 was proposed for change in the working document.
9. It is proposed that the heading to section 9 of the SDS return to “Physical and chemical properties” in paragraph 1.5.3.2.1 of the GHS.
10. It is also recommended, for consistency, that the title to section A4.3.9 of Annex 4 read “SECTION 9: Physical and chemical properties” to prevent ambiguity regarding the heading to section 9 of the SDS.
11. No change is proposed to the title of Table A4.3.9.1, although this could be considered by the Sub-Committee.
12. As safety characteristics are included in section A4.3.9 and the text for Tables A4.3.9.2 and A4.3.9.3 clearly indicates that these tables contain properties/safety characteristics and that this information is not required in the SDS, we believe there would be no confusion over where non-mandatory safety characteristics should be placed in an SDS, should the manufacturer choose to report them.

Proposal

13. The following amendments, for consistency and to prevent ambiguity, are proposed:
 - (a) For paragraph 1.5.3.2.1 of the GHS replace the text “9. Physical and chemical properties and safety characteristics” with “9. Physical and chemical properties”.
 - (b) For section A4.3.9 of Annex 4 of the GHS replace the text “SECTION 9: Physical and chemical properties and safety characteristics” with “SECTION 9: Physical and chemical properties”.
14. The Sub-Committee is invited to agree to the proposal as set out in paragraph 13 of this document.

Annex

References to section 9 of the SDS in the GHS

<i>GHS Revision (Rev.)</i>	<i>Paragraph</i>	<i>Table</i>	<i>Section 2.1.3</i>	<i>Paragraph</i>	<i>Section</i>	<i>Title of section A4.3.9 (Section 9) of Annex 4</i>
	<i>1.5.3.2.1</i>	<i>1.5.2</i>	<i>Note 2</i>	<i>A4.2.3.1</i>	<i>A4.3.7.2</i>	
Rev.5	9. Physical and chemical properties	9. Physical and chemical properties	Section 9 (Physical and chemical properties) of the Safety Data Sheet	9. Physical and chemical properties	Section 9 (Physical and chemical properties) of the SDS	SECTION 9: Physical and chemical properties
Rev.6, Rev.7, Rev.8	9. Physical and chemical properties and safety characteristics	9. Physical and chemical properties	Section 9 (Physical and chemical properties) of the Safety Data Sheet	9. Physical and chemical properties	Section 9 (Physical and chemical properties) of the SDS	SECTION 9: Physical and chemical properties and safety characteristics ¹

¹ Title revised in accordance with the proposal in ST/SG/AC.10/C.4/2014/21 as adopted by the Sub-Committee at its twenty-eighth session (ST/SG/AC.10/C.4/56 paragraphs 42-43 and Annex I).