

UN/SCEGHS/5/INF.6/Add4

**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Draft Guidance document circulated by Australia on SDS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 ACC (replaces ICCA)

Comments by ACC on the draft Guidance document circulated by the Correspondence group on SDS and submitted to the fifth session of the SCE GHS under reference UN/SCEGHS/5/INF.6 are presented in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

Consolidated Comments: UN SCE GHS Intersessional Working Group on Safety Data Sheets

| Topic | Comment/Question | Response |
|--------------|---|---|
| General | Document too prescriptive; should be more performance oriented | Recommend: Use 'should' unless specifically required by GHS Purple Book |
| | Separating text box information from the body of the text does not enhance readability | Recommend: Incorporate text box information into the body of the text |
| | 'Product' is not as encompassing as 'substance/mixture' | Recommend: Use 'substance/mixture' |
| | What information is required versus that which is optional is not always clear | Recommend: Increase clarity between minimum requirements and optional information (consistent use of 'must' and 'should') |
| 1.3.1 | Manufacturers may choose to develop SDSs for mixtures not meeting the criteria for classification as hazardous | Recommend: Add language that allows manufacturers to develop SDSs for non-hazardous materials |
| 3.2.1 | Unclear | Recommend: Rewrite 3.2.1 to increase clarity (e.g., product vs. ingredient) |
| Table 1. | Purpose of Table 1 unclear | Recommend: Refer users to Purple Book for cut-offs |
| 3.3.4 | 'End of SDS' not necessary if all pages are numbered and the total number of pages is given | Recommend: Delete section and add language to end of 3.3.3 |
| 3.4.1 | Reference to Chapter 4 unclear (is it Chapter 4 of this document, GHS, etc.) | Recommend: Further clarify reference (is it Chapter 4 of this document, GHS, etc.) |
| | Additional information required by 'Competent Authority' should not undermine the uniformity/standardization that GHS hopes to accomplish | Recommend: Present 'country specific' information in Section 15 |
| 3.6.1 | SI UOMs are not used universally | Recommend: Include provision that other UOMs may be included |
| 4.1 | Sentence does not include use restrictions | Recommend: Use language that is consistent with 4.1.4 |
| 4.1.1 | Bulleted list inconsistent with bolded subsections | Recommend: Combine Supplier's details and Emergency phone number into one bullet |

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| 4.1.2 | 'GHS product identifier' unclear | Recommend: Add 'GHS product identifier' to Chapter - 2 Definitions and Abbreviations |
| 4.1.5.1 | Restrictions on availability of emergency phone numbers should not be separate from the text | Recommend: Incorporate information in text box into 4.1.5.1 |
| 4.2.1 | Bulleted list inconsistent with bolded subsections | Recommend: Remove 'and any national or regional information.' |
| 4.2.3.2 | Name of hazard symbol '!' (i.e., exclamation point) does not indicate hazard | Recommend: Provide description(s) for '!' such as 'toxic' or 'irritant' |
| 4.2.4.1 | Text box unclear. Describing the importance of an SDS for hazardous and non-hazardous materials inconsistent with HAZARDS IDENTIFICATION | Recommend: Move text box language to 1.3 - Scope |
| 4.3.1.1 | EC Number is regional. Reference is not applicable to the Americas or several Asia/Pacific countries | Recommend: Remove reference; CAS# is more universal |
| 4.3.1.2 | Producers may also want to include non-hazardous ingredients | Recommend: Allow for inclusion of non-hazardous ingredients |
| 4.3.4 | EC Number is regional. Reference is not applicable to the Americas or several Asia/Pacific countries | Recommend: Remove reference; CAS# is more universal |
| 4.3.6 | Producers may want to disclose more than just the hazardous ingredients | Recommend: Identification of the chemical identity and concentration or concentration ranges of at least those ingredients that are hazardous... |
| 4.3.6.2 (a) and (b) | Examples are too prescriptive. The most hazardous ingredients will not necessarily be the in the greatest proportions (e.g., pesticides) | Recommend: Allow more flexibility in ingredient disclosure (e.g., descending order, hazardous ingredients first, etc.) |
| 4.3.6.3 | Ranges are too prescriptive and broad. Hazards of components may be very different at each end of a range – especially at lower concentrations (e.g., 0.5% is not equal to <10%) | Recommend: No specific ranges |

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| 4.3.6.4 | Should not be a separate subsection | Recommend: Add to 4.3.6.3 |
| | Does not include environmental effects | Recommend: Change sentence to read '...the human and environmental health effects should describe the upper limit of the range.' |
| 4.4 | Does not include information for the untrained responder | Recommend: Change the first sentence to read 'Describe initial care that can be given by an untrained responder without the use of sophisticated equipment or medication.' |
| 4.4.1 | Bulleted list inconsistent with bolded subsections | Recommend: Change first bullet to read 'Description of necessary first aid measures' |
| 4.4.2.2 | No mention of PPE requirements for first aid responders | Recommend: Add new sub point to include PPE requirements for first aid responders |
| 4.4.2.2 (d) | Known antidotes are included in 4.4.4.1 | Recommend: Remove from 4.4.2.2 (d) |
| 4.4.2.2 (e) | Information on specific first aid facilities should not be included in this section | Recommend: Move (e) to Section 8 – Appropriate Engineering Controls |
| 4.4.4.1 | Emesis/lavage are no longer recommended first aid procedures | Recommend: Remove language pertaining to emesis/lavage |
| | Phrases such as 'No known antidote' can cause confusion/panic and should not be used | Recommend: Add wording to 4.4.4.1 to stress the importance of only providing antidote information when it is available. |
| 4.5.1 | Bulleted list inconsistent with bolded subsections | Recommend: Remove '(e.g., nature...' |
| 4.6 | Introduction does not address differences in handling releases based on volume, etc. | Recommend: Adding text to address spill volume, land vs. water releases, etc. |
| 4.6.2 | Text box information does not add clarity | Recommend: Remove text box |
| 4.6.4.3 | Repeats information included in 4.6.4.1 and 4.6.4.2 | Recommend: Remove 4.6.4.3 |
| 4.7 | Inconsistent use of 'substance/mixture' | Recommend: Include reference to 'mixture' |

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| 4.7.3.1 (c) | 'Phlegmatisers' is unfamiliar | Recommend: Remove subpoint (c) or define |
| 4.8.1 | Bulleter list inconsistent with bolded subsections | Recommend: Remove 'e.g.,...' in first bullet and add '(PPE)' to last bullet |
| 4.8.2.1 | 'No occupational exposure limit allocated' is too prescriptive | Recommend: Allow use of any indicator that no exposure limit has been established |
| 4.8.2.2 | GHS does not require biological exposure limits | Recommend: Do not include biological exposure limits as 4.8.2.2 – combine as an 'or' statement with 4.8.2.1 to become 4.8.2 |
| 4.8.3 | Subsection was skipped | Recommend: Change 4.8.4 (and associated subsections) to 4.8.3 |
| 4.8.4.1 (a) and (b) | Examples are not truly engineering controls | Recommend: Remove example (a); combine (b) and (c) to read 'use local exhaust ventilation to maintain air concentrations below exposure standards.' |
| 4.9 | Text box information should not be separate from text | Recommend: Incorporate text box information into 4.9 |
| 4.9.1.1 and 4.9.1.2 | Subsections detract from what information is required in this section | Recommend: Incorporate subsections into 4.9 |
| 4.10 | Text box information should not be separate from text | Recommend: Incorporate text box information into 4.9 |
| 4.10.1 | Bulleter list inconsistent with bolded subsections | Recommend: Move '(e.g., static...)' to end of 4.10.4.1 |
| 4.10.6 | Hazardous decomposition products are not the same as products of combustion | Recommend: Emphasize that this section should be used for hazardous decomposition products only; hazardous combustion productions should be in Section 5 – Fire Fighting Measures |
| 4.11 | 'Lay language' impractical for providing toxicology data | Recommend: Remove reference to this section being understandable to 'lay persons' |
| 4.11.1 | Bulleter list inconsistent with bolded subsections | Recommend: Incorporate non-bullet text elsewhere in section (e.g., 4.11) |

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| 4.11.2.1 | Subsection number unnecessary | Recommend: Remove subsection number |
| 4.11.3.1 | Subsection number unnecessary | Recommend: Remove subsection number |
| 4.11.4.1 | Subsection number unnecessary | Recommend: Remove subsection number |
| 4.11.4.1 | Subsection number unnecessary | Recommend: Remove subsection number |
| 4.11.4.1 | Subsection number unnecessary | Recommend: Remove subsection number |
| 4.11.6.1.1 | Subsection number unnecessary | Recommend: Remove subsection number |
| 4.11.6.2.1 | Subsection number unnecessary | Recommend: Remove subsection number |
| 4.11.6.3.1 | First sentence 'Most frequently the material...' is irrelevant | Recommend: Removing first sentence. |
| 4.11.6.4.1 | Subsection number unnecessary | Recommend: Remove subsection number |
| 4.11.6.5.1 | 'All studies should be adequately referenced...'. References will not add value, will decrease comprehension and increase document length | Recommend: Remove reference requirement. Require that manufacturers provide references if requested |
| | Subsection number unnecessary | Recommend: Remove subsection number |
| 4.11.6.4.1 | Subsection number unnecessary | Recommend: Remove subsection number |
| 4.11.6.6.1 and 4.11.6.6.2 | Subsections are related | Recommend: Combine 4.11.6.6.1 and 4.11.6.6.2 as 4.11.6.6 |
| 4.11.6.7.1 (a) and (c) | Examples are pre-existing conditions which should be given in Section 4 | Recommend: Remove or change examples |
| 4.11.6.8.1 | Subsection number unnecessary | Recommend: Remove subsection number |
| 4.12.1 | Bulleted list inconsistent with bolded subsections | Recommend: Move '(aquatic...)' to end of 4.12.2.1 |
| | | Recommend: Delete bullet 'Other adverse effects' |
| 4.12.2 | Requirement to provide test method is inconsistent with other sections | Recommend: Remove requirement |
| 4.12.3 | Requirement to provide test method is inconsistent with other sections | Recommend: Remove requirement |

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| 4.12.4 | Requirement to provide test method is inconsistent with other sections | Recommend: Remove requirement |
| 4.14.1 | Bulleted list inconsistent with bolded subsections | Recommend: Change last bullet to read 'Special precautions for user' |
| 4.16.1 | Section does not provide for information that is important but not appropriate in Sections 1 through 15 | Recommend: Move first bullet to 4.16 and change to read, 'Other information, that does not belong in Section 1 through 15, including information on preparation...' |
| 4.16.1 (c) and (d) | References and data sources will not add value, will decrease comprehension and increase document length | Recommend: Remove requirement. Require that manufacturers provide references if requested |
| 4.16 | Text box information should not be separate from text | Recommend: Incorporate text box information into 4.16 |
| | Explanation of change could be difficult for automated systems | Recommend: Include provision that explanation of changes can be communicated in other forms (e.g., cover letter) as long as changes are identified on the SDS. |