

UN/SCEGHS/15/INF.17

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

Fifteenth session,
Geneva, 9-11 July 2008
Item 5 (a) of the provisional agenda

IMPLEMENTATION OF THE GHS

Consideration of issues relevant to Material Safety Data Sheets (MSDSs) by IMO Sub-Committee on Bulk, Liquids and Gases at its twelfth session (BLG 12)

Transmitted by the International Petroleum Industry Environmental Conservation Association
(IPIECA)

1. IPIECA presents this informal document in response to the formal document submitted by the International Maritime Organization (IMO) (ST/SG/AC.10/C.4/2008/2). The current draft of the MSC.150(77) resolution as amended by the IMO Bulk Liquids and Gases (BLG) Sub-Committee at its 12th session from 4 to 8 February 2008 diverges from the hazard communication framework developed by the UN Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (UNSCGHS). The fact that two bodies of the UN (IMO BLG and UNSCGHS) are taking divergent approaches to hazard communication is a serious concern.
2. MSC.150(77) significantly departs from the content of a standard Material Safety Data Sheet (MSDS) by requiring commercial, operational and product quality information on shipped liquids that does not pertain to crew safety considerations.¹
3. The current draft of the MSC.150(77) resolution as amended by the IMO BLG Sub-Committee at its 12th session from 4 to 8 February 2008 is not aligned with the hazard communication framework developed by the UNSCGHS. MSC.150(77) significantly departs from UNSCGHS recommendations by not requiring standard content (some of

¹ *Examples include: heating and carriage temperatures; pour point temperature; cloud point temperature; Cetane index, carbon residue, ash, total sediment, water, vanadium, aluminum, silicon, zinc, phosphorus, calcium, kinematic viscosity at 50° C; asphaltene content; total acidity; aromatic content; identification of non-hazardous additives and their percentage in the shipped liquid; distillation % recovered at 200° C, 340° C and 370° C; and saturated vapor pressure at recommended carriage temperature.*

which, when available, are important for fully communicating product hazards and controls) or by substituting non-standard requirements.

4. The UNSCEGHS has previously addressed MARPOL Annex 2 cargoes in development of the GHS “Guidance on the Preparation of Safety Data Sheets.” IPIECA references the “Report of the Sub-Committee of Experts on its Twelfth Session” (ST/SG/AC.10/C.4/24) where the UNSCEGHS added an additional sub-section under section 14 of Annex 4 of the GHS to take into account the information requirements regarding transport of substances in bulk according to MARPOL Annex 2 and the related IBC Code, as proposed in document ST/SG/AC.10/C.4/2006/21.
5. IPIECA has been working on guidance on the application of GHS criteria to petroleum substances according to the workplan presented at the thirteenth session (UN/SCEGHS/13/INF.4). At the fourteenth session, IPIECA listed issues that could result in divergent classification of petroleum substances (UN/SCEGHS/14/INF.10). Work on this guidance is ongoing as presented at this fifteenth session.
6. The GHS framework along with the IPIECA GHS guidance is sufficient to address hazards to the seafarer associated with MARPOL Annex 1 cargoes and marine fuel oils. While the GHS “Guidance on the Preparation of Safety Data Sheets” is considered suitable in all other respects, some additional guidance on benzene, sulphur, hydrogen sulphide and oil pollution characteristics may help ensure the adequacy of MSDS information to address seafarers and the marine environment. This needed guidance can be incorporated into the IPIECA GHS guidance on the application of GHS criteria to petroleum substances.

Recommendation of the UNSCEGHS

7. IPIECA supports IMO’s suggested collaboration between IMO and UNSCEGHS on MSDSs for the maritime industry. The IMO and UNSCEGHS should work together to ensure the UN is developing a consistent and practical approach to hazard communication. Only one hazard communication framework should be developed and advocated by the UN – GHS. UNSCEGHS should now consider potential improvements of GHS needed to address MARPOL Annex 1 cargoes and marine fuel oils.
