

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

Eighteenth session
Geneva, 9 - 11 December 2009
Item 2 (d) of the provisional agenda

UPDATING OF THE THIRD REVISED EDITION OF THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Annexes

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

Transmitted by the expert from Germany

Background

1. Annex 4 to the GHS gives Guidance on the preparation of Safety Data Sheets. Regarding its structure and contents, this Annex is corresponding closely to the former European legislation (Directive 91/155/EEC, Safety Data Sheet Directive).
2. This Directive was mirroring the "old" (pre-GHS) European classification system (according to the Substances Directive 67/548/EEC). As the systematics of classifying physical hazards according to the "old" European system and the GHS differ considerably, especially Section 9 on physical and chemical properties in Annex 4 is not reflecting the classification system according to the GHS adequately. This discrepancy also becomes clear when looking at Section 11 on toxicological information that actually is referring to the hazard classes as given in the main part of the GHS (as opposed to Section 9).
3. Furthermore, Section 9 relates to physical hazards (such as flammability) but also to properties which are not related to a hazard (such as relative density) or to properties that are not posing a hazard themselves but that are necessary for classification purposes (such as partition coefficient in n-octanol/water). As a result, the requirements in Section 9 are not structured at all and do not actually foresee providing all necessary information on the classification of physical hazards.

Proposal

4. In order to be helpful as guidance for the preparation of the Safety Data Sheet, it should be clearly distinguished between physical and chemical properties and physical hazards. The required information on physical hazards should actually reflect the according requirements of Part 2 of the GHS.

5. We therefore would like to ask for the Sub-Committee agreement to work on this issue. Experts are invited to express their views on the proposed revision of Annex 4, either during this session or later on by email. Based on the feedback received, the expert from Germany may consider submitting a more detailed proposal defining the scope and terms of reference for the work, to the next session of the Sub-Committee.
