

UN/SCEGHS/7/INF.18

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
(Seventh session, 14-16 July 2004,
agenda item 3 (b))

DEVELOPMENT OF GUIDANCE FOR IMPLEMENTATION

Safety Data Sheets (SDS)

Comments on ST/SG/AC.10/C.4/2004/1(Australia)

Transmitted by the expert from Japan

JAPAN Comments on the draft *GUIDANCE ON THE PREPARATION OF SAFETY DATA SHEETS (SDS)* transmitted by Experts of Australia and related amendment on current GHS

Slight modifications are needed on the guidance document on safety data sheets and they should be applied to the current GHS in terms of consistency between GHS current text and the still-draft guidance.

Amended text in each section is expressed with the mark as follows:

➤ XXXXXXXXX.

Comment 1:

A10.2.3.1.3 CAS number, EC number for the substance

➤ ***A10.2.3.1.3 CAS number and other unique identifiers for the substance***

Reasons: EC number should be deleted since it could be misunderstood as it is mandated to put on SDS. Each country/region has its own numbers for substances. For example, there are specific numbers identified by the Chemical Substance Control Law or Industrial Safety and Health Law in Japan.

There is a related text in “3. Composition/information on ingredients” on page 38 of the current GHS document; this text should be consistent with the amendment above.

p.38 3. Composition/information on ingredients

CAS number, EC number, etc

➤ :CAS number and other unique identifiers for the substance

Comment 2:

Since “Odor threshold” in “A10.2. Section 9 Physical and chemical properties” in the guidance was deleted, related text in “9. Physical and chemical properties” on page 39 of the current GHS document should be deleted in terms of consistency between the GHS text and the guidance.
