World-wide GHS implementation and its non-harmonized aspects

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Topic:

This poster discusses some of the main concerns faced by those creating SDSs, regarding the world-wide GHS implementation and main features where the non-harmonization is most evident.

Approach:

This is a very large and intensive topic which most certainly cannot be extensively covered in a poster presentation. The goal here is to provide an overview to be used as a basis for further discussion and data compilation.

Summary:

The GHS is harmonized in the sense that a basis of communication has been established and is spreading world-wide. Each country can use this basis rather than re-inventing the wheel, thus providing increased global opportunities for smaller countries and companies, to communicate more easily on the global mar-

The "lack" of harmonization emphasises the uniqueness of countries and their approaches, needs, interpretations and efforts to ensure safety. Just as with any language, the nuances make us aware of our differences. In order to generate compliant SDSs, there remains a need to generate them country-specifically. Of course, one can argue that there are examples of times where one SDS might cover two countries, but we must understand that that is not the norm. Most times, one size does not fit all.

THE BIG PICTURE:

Differences in GHS Implementations

Three factors contribute to the big picture differences:

- Each country bases its GHS implementation on the UN Rev. that is in force at the time of implementation.
- Some countries have updated to newer versions. Thus, a wide range of revisionsare currently implemented in different countries.
- Some countries have gone further and created rather distinctive versions of the GHS (USA, Canada, EU)

This leads to many differences between country versions. One major difference lies in the implementation of Hazard Classes and Categories.

The US and Canada have a number of additional classes while not adopting every class presented by their corresponding UN Revision, 3 and 5 respectively.

Many countries did not adopt Acute Toxicity Cat. 5.

The US and Canada did not adopt the Environmental Hazard classes of the GHS, while most countries do adopt them, and other countries, such as Mexico, do not require them on the label.

Sections 12 to 15 are not enforced by OSHA, but in the US, there is still a requirement to have consistency with the UN GHS, thus complicating matters for the SDS author.

These differences result in substances actually falling into different Classes,

CLASSIFICATION:

Raw Materials

One of the biggest problems regarding Raw Materials, is the lack of consistent Classes and Limits: classification. There are millions of CAS numbers in existence and thousands added | Classifications will differ depending on daily. Various factors influence the classification differences:

Official Classifications:

Countries such as the EU, Korea, Japan, Australia, China, Taiwan, South Africa, and Carcinogenictiy, STOT, Reproductive Malaysia, have implemented lists of officially classified substances. The substances toxicity, and Respiratory and skin on these lists do not always overlap from country to country. Some countries have sensititzation, have seen changes in made these classifications mandatory and others not. In addition, some, such as consideration limits and classification Japan, are known to have stricter classifications than other countries.

Supplier differences:

Suppliers will have different classifications, based on their own data, and it is The way that Aerosols / Compressed permitted to rely on the supplier classification, unless there is reason to doubt it.

IARC and NTP:

Based upon the holistic approach to classification, the US and Canada suggest the use of the IARC and NTP classifications, when classifying raw materials. While this is not mandatory, there is a requirement to justify if this data is not used. As a result, subtances can be classified as Carcinogens in the US and Canada, but not in most of the rest of the world. (i.E. Carbon Black)

DOCUMENTATION:

Document Requirements

The country-specific approaches to GHS implementation, have affected output requirements.

Precautionary statements:

Differences in wording come from the UN Revision implemented, as well, as intentional changes decided upon by the legislator. As for example, in the USA, where P-phrases have been reworded. The limits on the amount of P-phrases to be output, as well as the criteria for leaving off P-Phrases, vary.

The different UN Revisions and country preferences also lead to differences in combined P-Phrases.

In the USA, there are no defined limits on the amount of P-Phrases that must appear, while in the EU and many other countries, a maximum of 6 P-Phrases has been set, unless more are necessary.

Languages:

SDSs must be written in the official language / languages of the SDS country.

Some countries, such as Canada and Malaysia, require documentation to accompany each product in both official languages. Whereas, other countries allow different variations in the amount of languages, depending on use and area (Switzerland, Belgium, Luxembourg).

Turkish SDSsmust state the identification of the individual certified to ensure the correctness of the SDS. This certification can only be achieved by Turkish speakers.

Local Address and Emergency telephone numbers:

Most countries require not only that the Emergency telephone number on the SDS be local, but also that an address of an importer, manufacturer, supplier, located within the country or region to which the SDS applies, is output on the document.

CLASSIFICATION:

Preparations

the GHS Revision adopted.

Especially such classes

Aerosols/ Compressed Gases:

Gases are classified, has also changed and is being implemented differently in different countries. Here, the EU is has the most specific definitions.

These factors, of course, result in substances classified in one country and not another.

CLASSIFICATION:

Other Legislation

Transport:

It is important to note that the transport classification will not always align with the GHS classification. One such example is in the USA, where one will find substances classified as Marine Pollutants in the DOT, but no Environmental Hazards in the GHS. Corrosivity

Registration requirements:

Annex VIII of the CLP and its PCN requirements. Different countries are setting up their own registration requirements, that must be taken into consideration upon import.

Reach (EU, Turkey, Korea, Great Britain) and US TSCA changes.

NFPA/HMIS:

Major discussions surround the use of the NFPA/ HMIS ratings, and whether their numbering

DOCUMENTATION: Trade Secrets

Trade Secret requirements can be extremely complicated to navigate.

Percent ranges:

Technically, the GHS requires the output of exact percentages in Section 3, unless these are not known, as for example when there are batch variations or the data is simply not available.

Percent ranges in order to suppress trade secret information are permitted but with limitations:

USA: any percent range outputs must be defensible as trade secrets.

Canada and Australia: the use of percent ranges for trade secrets is permitted, but only using the legislatively defined limit table.

Other countries: you will find strewn throughout the legislation, countries that require specific types of ranges, defining exactly how many percentage points are permitted in either direction.

Trade secret descriptions:

Canada: In Canada a company must apply for an HMIRA number in order to suppress the name and identification of the substance.

USA: Suppression of substance identification must always be justifiable with evidence, but no special permission is required.

Indonesia: Permits suppression of identification information, as long as one can specifically defend that doing so does not harm health, environment, safety and security.

