

Perfecting Safety Data Sheet Development: From Big Picture Management to Small Technical Issues

Approximately 30 participants shared their experiences and challenges developing and authoring safety data sheets (SDSs).

Participants' job duties ranged from managing thousands of SDSs to managing only a handful of SDSs. Participants reported using the LOLI database, Ariel, SERC/SAP, and NCI Global to access underlying data, and MSDGen, SAP, WERCs, and ProSteward, or a simple word processor for SDS authoring. The need for customization and updates with various software was discussed. A participant asked whether SCHC could develop software, since SCHC provides access information about regulations that is used by software developers. Discussion included the fact that SCHC does not interpret regulations, as its members may have different interpretations.

Challenges discussed with respect to using SDS software included:

- Software and data updates
- Customization and changes to templates
- Integration with other systems (e.g., to access customer information for SDS distribution)
- Professional judgment and review, either of the system during testing or of SDSs after implementation
- The need for "pristine" data and disciplined data entry, with constant quality assurance (QA)
- Achieving consensus and agreement among staff about how things should be done
- The need for technical staff to understand the principles behind the software well enough to check the system
- Differences in testing versus actual production, and the ability to reproduce and troubleshoot problems
- Changing or conflicting instructions for using software from different software project managers
- Information technology (IT) training for staff

Change management was discussed at length, including changes in software, data, or regulations and regulatory deadlines. ISO quality management for software systems was discussed. Release notes and other documentation to help users detect software upgrades, new data, and other changes were also discussed. Participants reported that changes trigger SDS impact analysis, scheduling actions, and possibly alerting customers. Quarterly or semi-annual software updates were discussed, and difficulties upgrading (e.g., having to take systems offline) were described. Some things merit immediate changes ("go to the head of the line") and other issues can be managed by scheduled changes. The need for a process outside the system to manage changes was discussed. One or more software vendors mentioned that the request for notification of changes (rather than having to query the system) had been received.

Additional topics discussed included machine learning (e.g., in dangerous goods and group assignments for chemicals). The need for human involvement to handle outliers for Section 14 was discussed.