

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 4 (c) of the provisional agenda

IMPLEMENTATION OF THE GHS

Cooperation with other bodies or international organizations

Note to IMO Sub-Committee on bulk liquids and gases (BLG Sub-Committee)
on the review of the recommendations for Material Safety Data Sheets (MSDS)
for MARPOL Annex I oil cargo and oil fuel

Note by the secretariat

Following the request made by the Sub-Committee at its seventeenth session, the secretariat has submitted the document reproduced hereafter to the BLG Sub-Committee for consideration at its 14th session (8 to 12 February 2010).

The document is reproduced as initially submitted to the IMO secretariat.

SUB-COMMITTEE ON BULK LIQUIDS
AND GASES
14th session
Agenda item 16

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COMMUNICATION BY THE SUB-COMMITTEE OF EXPERTS ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS SUB-COMMITTEE) ON THE REVIEW OF THE RECOMMENDATIONS FOR MATERIAL SAFETY DATA SHEETS (MSDS) FOR MARPOL ANNEX I CARGOES AND MARINE FUEL OILS

SUMMARY

<i>Executive summary:</i>	The BLG Sub-Committee agreed, at its thirteenth session, to the draft MSC resolution on Recommendations for material safety data sheets for MARPOL Annex I oil cargo and oil fuel for submission to MSC 86 for adoption. Having noticed some differences between the agreed recommendations for IMO SDS and the harmonized GHS SDS, the GHS Sub-Committee would like to reiterate its view regarding the development of sector specific requirements for SDS differing from the harmonized approach given by the GHS.
<i>Strategic direction:</i>	1.3
<i>High-level action:</i>	1.3.5
<i>Planned output:</i>	1.3.5.1
<i>Action to be taken:</i>	Consider further cooperation with the GHS Sub-Committee to study how the specific needs of the maritime sector can be taken into account within the framework of the harmonized GHS SDS
<i>Related documents:</i>	BLG 13/18 (section 10 and Annex 12); Report of the Sub-Committee of Experts on the GHS on its fifteenth, sixteenth and seventeenth sessions (documents: ST/SG/AC.10/C.4/30, -/32; and -/34, available at: http://www.unece.org/trans/main/dgdb/dgsubc4/c4rep.html)

1. At its thirteenth session, the BLG Sub-Committee agreed to the draft MSC resolution on Recommendations for material safety data sheets for MARPOL Annex I oil cargo and oil fuel (as set out in Annex 12 to the report of that session, BLG 13/18) for submission to MSC 86 for adoption. This decision was communicated by the representative of IMO to the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (GHS Sub-Committee) at its seventeenth session, held in June 2009.

2. While acknowledging the work done by the BLG Sub-Committee on the revision of the requirements for material safety data sheets in relation to MARPOL Annex I, the GHS Sub-Committee notes that there are differences between the IMO recommendations for the

preparation of material safety data sheets (referred to as Safety Data Sheets (SDS) in the GHS) and those of the GHS.

3. The GHS SDS was developed aiming not only at harmonizing the minimum information elements to be included in a SDS but also at providing a single SDS covering the needs of all sectors. The GHS Sub-Committee is therefore concerned about the possible proliferation of sector specific divergences from the minimum information required by the GHS for the preparation of SDS.

4. The GHS Sub-Committee was first informed about the work at IMO on issues related to SDS at its fifteenth session in July 2008. While recognizing that some sectors might need to include in the SDS additional information elements relevant to their area of work, the GHS Sub-Committee concluded at that time, that the way in which this information could be integrated into the harmonized GHS SDS needed further consideration.

5. At its sixteenth session, the GHS Sub-Committee was informed that a correspondence group had been established within the BLG Sub-Committee to determine the appropriate information to be provided in the SDS. The representative of IMO explained that the information provided by the correspondence group could be used to decide whether the specific information items needed for the maritime sector could be integrated in the GHS SDS or whether specific guidance would have to be developed. He also informed the GHS Sub-Committee that the intent of IMO was to fully utilize the GHS guidance in developing SDS for cargoes and marine fuel oils subject to MARPOL Annex I.

6. However, the GHS Sub-Committee noted at its seventeenth session (held in June 2009) that the BLG Sub-Committee, after having considered the report of the correspondence group, agreed to a draft MSC resolution on recommendations for SDS which are not fully in line with the GHS SDS, as they include additional information items as part of the minimum information elements initially required by the GHS SDS. The Maritime Safety Committee adopted the proposed draft resolution as resolution MSC.286(86) at its 86th session in July 2009.

7. The GHS Sub-Committee would like to reiterate its view that a harmonized SDS which meets the needs of all sectors should be the goal. Most GHS experts consider that using a single SDS covering the needs of all sectors is important rather than having sector-specific requirements for SDSs. Therefore, the GHS Sub-Committee strongly recommends that in case a given sector (e.g. the maritime sector) feels that additional information needs to be included as part of the minimum information required by the GHS SDS, this should be communicated to the GHS Sub-Committee in order that a consideration of how to address sector specific needs may be undertaken without jeopardizing the overall goal of providing a harmonized GHS SDS suitable for all the sectors concerned.

8. As a possible way forward, some GHS experts have suggested that a joint correspondence group between the GHS Sub-Committee and the IMO BLG Sub-Committee should be established to study how the specific needs of the maritime sector can be taken into account within the framework of the harmonized GHS SDS.

9. The GHS Sub-Committee will consider this suggestion on the basis of the outcome of the discussions on this issue at the fourteenth session of the BLG Sub-Committee.
