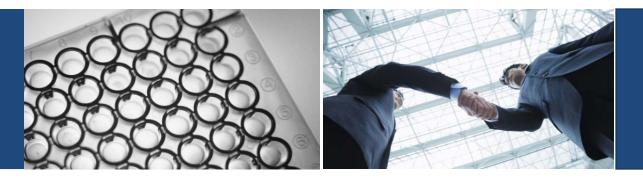


The GHS Updates In 2019 & Compliance Tips In Asia Countries



Cloris Pan, GHS Service Team - CIRS Group

2019.09.26

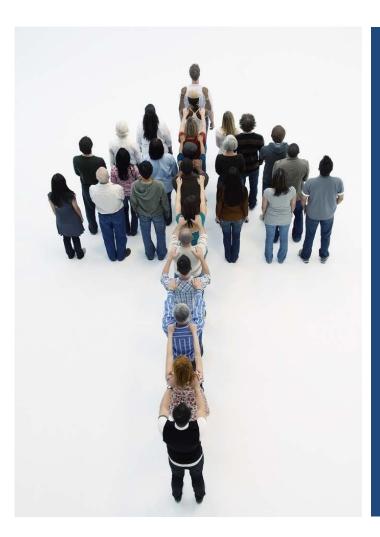
What is GHS







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- > The GHS updates in 2019
- GHS requirements in China, South Korea and Japan
- Difference among EU CLP, China GB, Korea MOEL and Japan JIS
- Compliance suggestions for chemicals exporting to China



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The GHS updates in 2019



Newly published

- UN GHS 8th rev. purple book
- CLP updates
- Japan

New draft available

- South Korea
- Israel

Consultation & Planning

- Australia&New Zealand, the US&Canada, Brazil&Argentina, Singapore, Malaysia, Chile
- EAEU (Armenia, Belarus, Kazakhstan, Kyrgyzstan and Russia), South Africa, Kenya, Sierra Leone

UN GHS - Updates in the 8th rev. edition purple book

Classification criteria

- > Explosive
- > Aerosols
- Skin corrosion/irritation
- Specific Target Organ Toxicity

New hazard category + communication elements

chemicals under pressure

New hazard (not included in any category)

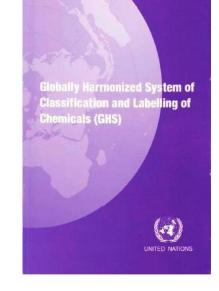
dust explosions

New pictogram

keep out of reach of children

Example 10: Labelling of - sets or kits

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Adaptation to Technical Progress (ATP)

"The harmonised classification and labelling of hazardous substances is updated through an "Adaptation to Technical Progress (ATP)" adopted yearly by the European Commission, following the opinion of the Committee for Risk Assessment (RAC). Other changes to the legal text may also be implemented through an ATP."

- from ECHA website

12th ATP

- Implements the 6th and 7th amendments of the purple book
- The changes will apply from 17 October 2020.

13th ATP

- Harmonised classification (Annex VI) updates
- The changes will apply from 1 May 2020.



Occupational Safety and Health Act (Osha) amendment

- Including several updates
- The updates for material data safety sheets (MSDS) will apply from 16 January 2021.

New requirements

- Full composition disclosure required
- Submit the MSDS to MoEL prior to manufacture or import (<100kg/y research purposes exempted)
- Separate document including non-hazardous ingredients to MoEL
- For trade secret, prior approval from MoEL



Revised according to the 6th rev. UN GHS(purple book) in May 2019

- JIS Z 7252 Classification of Chemicals Based on GHS
- JIS Z 7253 Hazard Communication of Chemicals Based on GHS Labelling and Safety Data Sheet
- Apply from 24 May 2022 (3-year transition period)

https://www.jisc.go.jp (not available when visiting the website outside Japan)

JIS詳細表示							
規格番号	JISZ7252	SZ7252					
規格名称	GHSに基づく化学品の分類が	与法					
主務大臣	経済産業,厚生労働						
制定年月日	2009/10/20						
最新改正年月日	2019/05/25	019/05/25 最新確認年月日					
JIS詳細表示							
規格番号	JISZ7253	JISZ7253					
規格名称	GHSに基づく化学品の危険 ト (SDS)	有害性情報の伝達方法 − ラベル,	作業場内の表示及び安全データシー				
主務大臣	経済産業,厚生労働						
制定年月日	2012/03/25	2012/03/25					
最新改正年月日	2019/05/25	最新確認年月日	2016/10/25				
			Chemical Regulatory Services Specia				



SI 2302 Part 1 on classification, labelling, and packaging of chemicals

- 3-year transition period
- ➢ In Hebrew

"This draft standard revision is based, with a few changes and national deviations on the UN document "Globally Harmonized System of Classification and Labelling of Chemicals (GHS)". This regulation is gradually replacing the 2 European directives which were the base for the standard's earlier edition (67/548/EEC and 1999/45/EC) and that should be cancelled on 1 June 2015. The UN regulation's parts dealing with substances had already entered into force in Europe in 2010 and the regulation's parts dealing with mixtures should enter into force in 2015. "

- From WTO-TBT notification

Other planning



The US, Canada, Australia

- May update to 7th rev. UN GHS
- Safe Work Australia (SWA) was consulting

Brazil, Argentina, Chile

• 6th rev.

Singapore

• 6th or 7th

Malaysia

• Update the classification list in ICOP 2014



• 7th for industrial chemicals only

Sierra Leone

• Implement GHS in 2020~2023

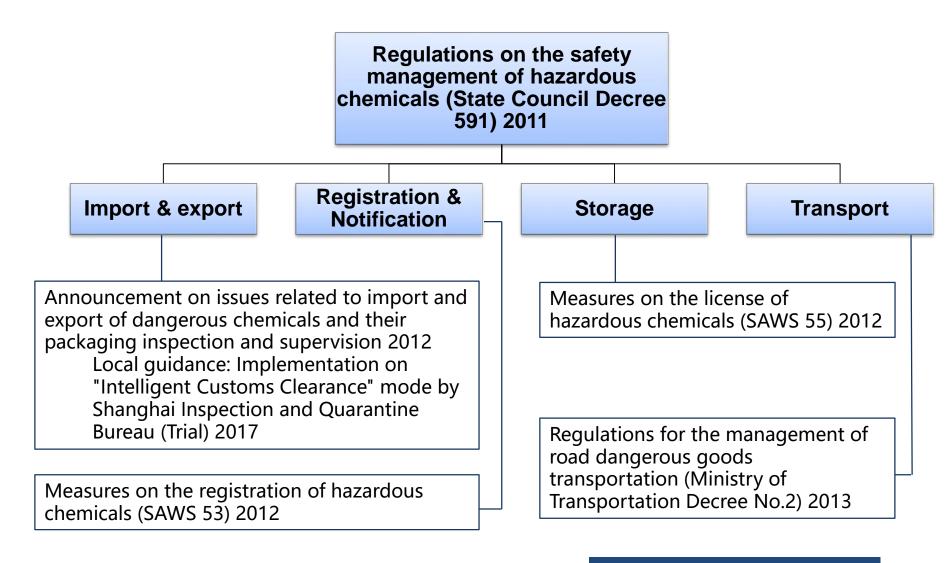


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China – SDS/labels are required for all hazardous chemicals CIRS





The national standard

- ➢ GB 30000.2-29-2013: Rules for classification and labelling of chemicals
- ➢ GB 15258-2009: General rules for preparation of precautionary label for chemicals
- ➢ GB/T 16483-2008: SDS for Chemical Products Content and Order of Sections
- GB/T 17519-2013: Guidance on the compilation of safety data sheet for chemical products

The hazardous chemicals list (2015 ver. 2828 items)

- Compulsory requirements for classification
- Supplier can add more classification and/or upgrade the hazards which marked with <*> in the guidance of implementation of hazardous chemicals list

China – available database



Published books

- Manual of hazardous chemicals inventory (SAWS, NRCC)
- Compilation of Safety Data Sheet for hazardous chemicals ver3.0 (NRCC, SINOPEC, SKLSCC)



Links in Annex II of GB/T 17519-2013

	第	第	第	第	第	第	第	第	第	第	第	第	第	第	第	第
SDS data resource	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	部	部	部	部	部	部	部	部	部	部	部	部	部	部	部	部
	分	分	分	分	分	分	分	分	分	分	分	分	分	分	分	分
Accelrys: (美国) 化学物质毒性效应登记数据库		~	\square					~			~					
Accelrys:Registry of Toxic Effects of Chemical Substances(RTECS)																
http://ccinfoweb.ccohs.ca/rtecs/search.html																



Chemical Control Act

Mandatory for "Toxic substance"

onyl phenol, potassiur	m salt (1:1), d	cas번호: 27936-43-2	
Chemical Information	NIER's No	Content(%)	Regulation information on contents
Toxic substance	2019-1-9 14(신규화 학물질)	Nonyl phenol, potassium salt (1:1) or mixture containing 2.5% and above	

Occupational Health and Safety Act

- All chemicals with GHS classification
- > 2019 updated



Relevant MoEL Notice

- MoEL Notice No.2016-19: Criteria for Classification and Labeling of Chemical Substances and Safety Data Sheets (In Korean)
- MoEL Notice No.2018-66: updated the OSHA requirement, including providing MSDS to workers and application of CBI information

Classification of substance can be searched on http://ncis.nier.go.kr/

ALL		General I	nformation	Classification a	nd Labelling
assification and Labelling					
ignal words : Danger [GHS02]	[GH	JS04]	[GHS05] [GHS00	[GH508]	M Value : - UN No : <u>1198 , 2209</u> Print Lab
Hazard Classification Hazard entered					
Hazaru Classification				Hazard er	tered
Flammable gases	1	H220	Extremely flammable ga		tered
	1	H220 H280	Extremely flammable ga Contains gas under pres	i.	
Flammable gases				i.	
Flammable gases Gases under pressure	2	H280	Contains gas under pres	s. sure: may explode if heat	
Flammable gases Gases under pressure Acute Oral Toxicity	2 3	H280 H301	Contains gas under pres Toxic if swallowed.	s. sure: may explode if heat	
Flammable gases Gases under pressure Acute Oral Toxicity Acute dermal toxicity	2 3 3	H280 H301 H311	Contains gas under pres Toxic if swallowed. Toxic in contact with ski	; sure: may explode if heat h.	

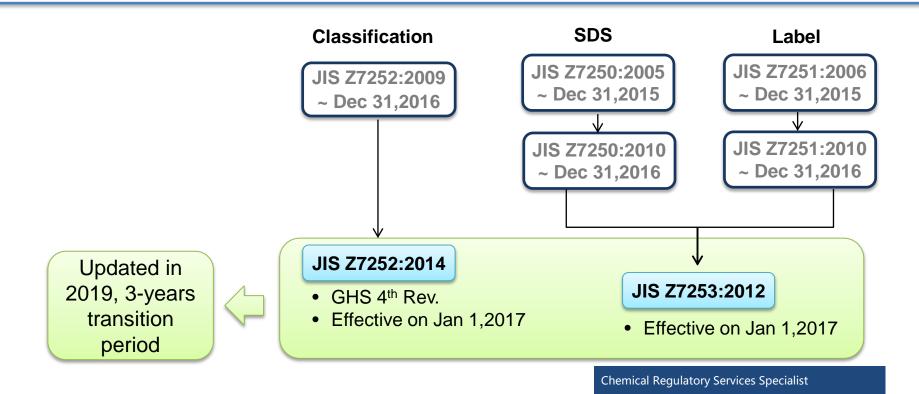


Laws	Substances	SDS	Labeling
PRTR Law	Specific Class I: 15 substances Class I: 462 substances Class II:100 substances	Obligation	Reasonable efforts
Industrial Safety and	Table 3 and 9: 640 substances Table 9: 640 substances	Obligation	Obligation
Hygiene Law	Other classified hazardous substances and mixtures	Reasonable efforts	Reasonable efforts
Poisonous and Deleterious Substances Control Law	Poisonous substances: 145 Deleterious substances: 392	Obligation	Obligation



JIS standards (updated in 2019)

- JIS Z 7252 Classification of Chemicals Based on GHS
- JIS Z 7253 Hazard Communication of Chemicals Based on GHS Labelling and Safety Data Sheet





Advisory classifications from Japanese Ministries

Ochemical Hazard and Risk Information						
😑 Japan						
GHS Classification Results by the Japanese Government						
GHS Classification Results by the Japanese Government Data Description GHS Information						
Year of implementation /renewal	2006	-				
Chemical Substance Name	Formaldehyde					
Classification Result	HTML Excel					
Year of implementation /renewal	2017	latest				
Chemical Substance Name	emical Substance Name Formaldehyde					
Classification Result	HTML Excel					
	-					

ASEAN-Japan Chemical Safety Database (AJCSD).

- http://www.ajcsd.org/chrip_search/html/AjcsdTop.html
- > The Myanmar, Malaysia, Japan classifications are included.



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Building block

• Official list of hazardous chemicals (mandatory & advisory)

Difference among EU CLP, China GB, JP JIS, KR MOEL

SDS authoring

Classification

- Language
- Information required to be indicated on SDS

Label designing

- Language
- Precautionary statements selections
- Supplemental information on labels
- Dimensions

CIRS



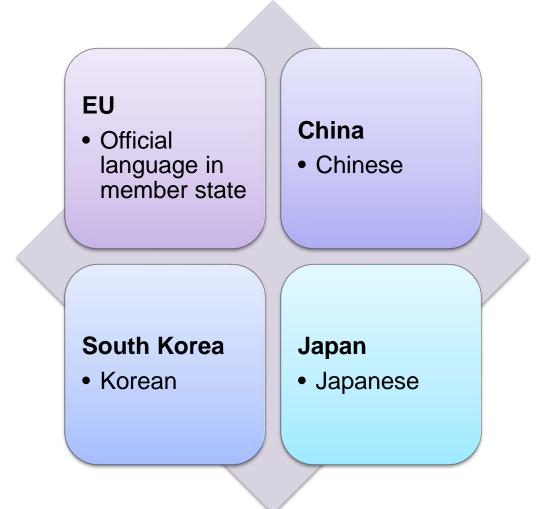
Hazard class	EU CLP	China GB	Korea MoEL	Japan JIS
Flammable liquids	Category 1-3	Category 1-4	Category 1-3	Category 1-4
Acute toxicity	Category 1-4	Category 1-5	Category 1-4	Category 1-4
Skin irritation / corrosion	Category 1-2	Category 1-3	Category 1-2	Category 1-2
Aspiration toxicity	Category 1	Category 1-2	Category 1-2	Category 1
Hazardous to aquatic environment (acute)	Category 1	Category 1-3	Category 1	Category 1-3



Sulfuric Acid (CAS#7664-93-9)				
EU CLP – Annex VI	H314			
Guidance of inventory of hazard chemicals in China (2015 version)	H314, H318			
Korea toxic substance	H290, H314, H330, H412			
Japan (Inter-ministerial Committee on GHS, 2006, updated in 2018)	H303, H330, H314, H318, H370 (Respiratory system), H372 (Respiratory system), H402, H410			

Languages









Languages required for labels and safety data sheets

Country	Language 1	Language 2	Language 3
Austria	German		
Belgium 1)	French	Dutch	German
Bulgaria	Bulgarian		
Croatia	Croatian		
Cyprus	Greek		
Czech Republic	Czech		
Denmark	Danish		
Estonia	Estonian		
Finland	Finnish	Swedish	

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Information required on SDS (examples)



Registration number

• EU REACH, South Korea K-REACH

Emergency contact number

• EU poison center, China (domestic 24h)

Local supplier information

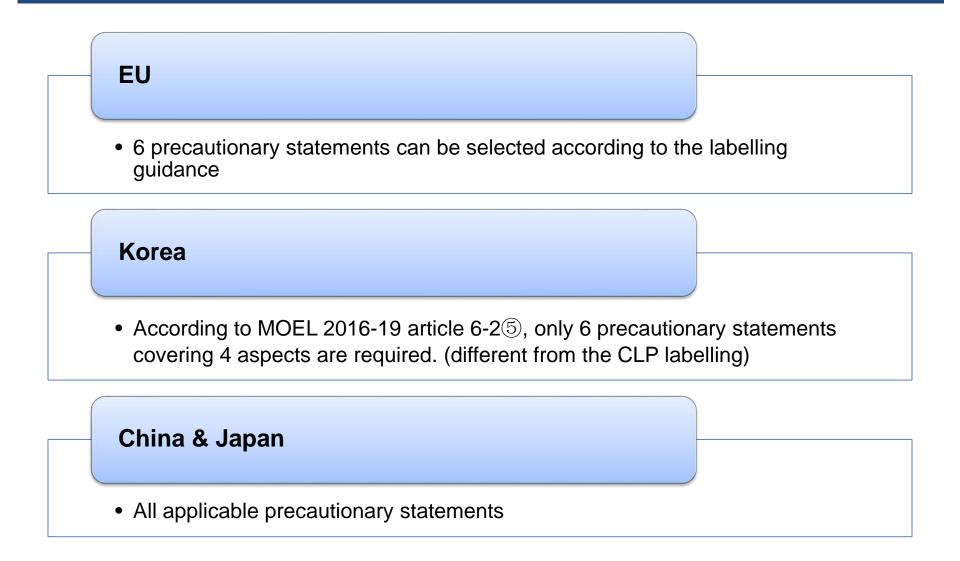
• South Korea

Regulatory information

• Japan Fire Law, Poisonous and Deleterious, Substances Control Law

Selections of precautionary statements on labels







EU

Supplemental hazard (EUHxxx), child-resistant fastenings, tactile warning of danger

Japan

Poisonous and Deleterious Substances Control Law requires the "poisonous or

deleterious substances" name and its percentages





EU	Capacity of the package	Dimensions of the label(mm)	Dimensions of the pictogram (mm)
	≤ 3 L	If possible, at least 52 x 74	≥ 10 x 10 If possible, ≥ 16 x 16
	> 3 L but ≤ 50 L	≥ 74 x 105	≥ 23 x 23
	> 50 L but ≤ 500 L	≥ 105 x 148	≥ 32 x 32
	> 500 L	≥ 148 x 210	≥ 46 x 46

China

Container Capacity	Minimum Label Dimensions (mm)
≤ 0.1L	Simplified labels
> 0.1 - ≤ 3L	> 50 × 75
> 3 - ≤ 50L	> 75 × 100
> 50 - ≤ 500L	> 100 × 150
> 500 - ≤ 1000L	> 150 × 200
> 1000L	> 200 × 300

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Korea

Capacity of the package	Dimensions of the label(cm2)	Dimensions of the pictogram (cm2)
< 5 L	≥ 5% or more of surface	
≥ 5 L but < 50 L	≥ 90	> 4/40
≥ 50 L but < 200 L	≥ 180	≥ 1/40 ≥ 0.5 cm2
≥ 200 L but < 500 L	≥ 300	
≥ 500L	≥ 450	

Japan

Not specified in JIS 7253

Confidential information protection



China

• generic name and concentration range

South Korea

- substance name and concentration range(5%)
- Separate sheet including complete composition information can be submitted to MoEL





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Inventory status checking

- Inventory of Existing Chemical Substances Produced or Imported in China (IECSC)
- Catalog of Hazardous Chemicals(2015)
- http://apciss.cirs-group.com/?l=en-us

Classification

> GB 30000.2-28-2013

Chinese SDS

➢ GB/T 16483-2008 and GB/T 17519-2013

Chinese GHS label

➢ GB 15258-2009



Lacking of product name (CN&EN)

Missing sections (9 or 12 sections)

Incorrect languages & poor translations

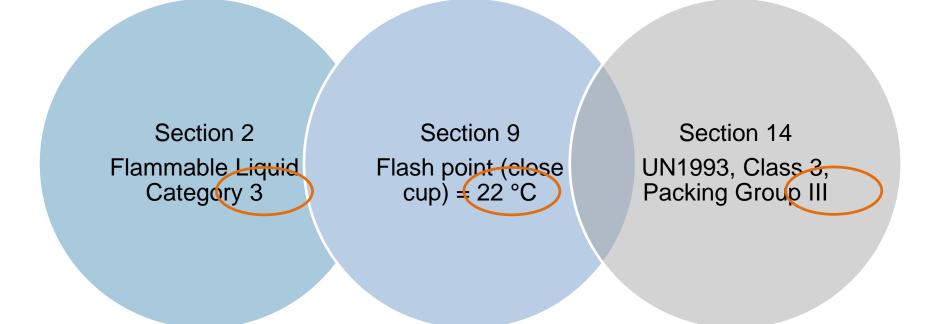
Data does not support the relevant classifications

Missing/incorrect transportation information

The label does not match the SDS

Inconsistent info given in SDS - example





If the flash point (close cup) is above 23 °C and below 60 °C, it is classified as Flammable liquid category 3. The Packing Group is "III".



- SAWS: State Administration of Work Safety (China)
- NRCC: National registration center of chemicals (China)
- MEP: Ministry of Environmental Protection (China)
- AQSIQ: Administration of Quality Supervision, inspection and Quarantine (China)
- SKLSCC: State Key Laboratory of Safety and Control for Chemicals (China)
- MoEL: Ministry of Employment and Labor (Korea)
- Korea OSHA: Korea Occupational Safety and Health Act (Korea)
- PRTR: Law concerning Pollutant Release and Transfer Register (Japan)
- ISHL: Industrial Safety and Hygiene Law (Japan)
- PDSCL: Poisonous and Deleterious Substance Control Law (Japan)
- ASEAN: Association of Southeast Asian Nations (Japan)

Thank you



Website: www.cirs-group.com Address : 11F, Dong Guan hi-tech park, 288 Qiuyi Rd, Binjiang, Hangzhou, China. Zip code : 310052 Tel : 4006 721 722 Email : Info@cirs-group.com