

## 1. Series introduction and Global GHS (July1, 2020)

Q1: Our substance goes to several countries in Asia and EU, shall we translate the SDS/label into many language versions?

A1: Yes, the SDS should be translated into the official language of the destination countries and regions. To be noted, in EU, the difference may be mainly the language, because many of the countries in EU are regulated under the CLP regulation, so the classification, data and some contents are the same. But for Asia and some other countries who have local standards, not only the languages need to be changed, you also should recheck the classification and ensure the contents based on the local standards.

Q2: Shall we revise our SDS and label every year?

A2: The time we need to revise our SDS and label is affected with several conditions,

1. When the chemical' s hazards change, like the new hazardous substances is found or new testing data applied.
2. When the regulation updated, at that situation, industry usually has a transitional period to revise the information.

As the advice of the purple book, it should be every 3-5 years. Some countries have set the regularly review requirements. For example, in Singapore, it is every 5 years.

Q3: What are the major updates in GHS Revision 8. Which countries have adopted Version 8.

A3: The updates in GHS revision 8 including,

- 1) classification criteria of explosives, aerosols and skin corrosion/irritation;
- 2) A new category "chemicals under pressure" is added to the section 2.3;
- 3) A new category "dust explosions" is added to the Annex;
- 4) 2 suggested symbols for P102 "keep out of reach of children" are provided;

At the moment, no region implement the Revision 8 GHS. As the latest information, many countries and regions are going to adopt the 7<sup>th</sup> revised edition, including the European Union, Australia, China and the US, etc.

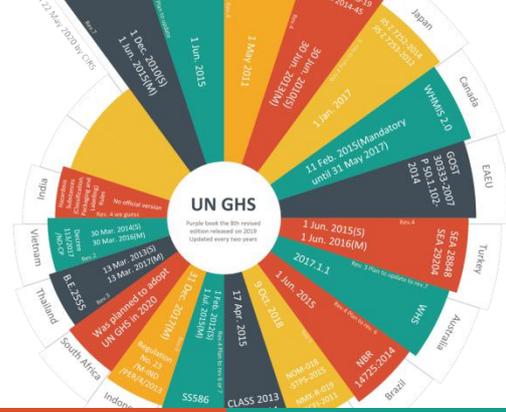
Additionally, not every version of the purple book will be implemented by all of the countries.

Q4 : How to handle conflicts in GHS and DG classification?

A4 : We may find 2 main conflicts conditions between GHS and DG. I use 2 examples to explain our understanding. The real cases can be much more complicated.

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- 1) The substance is not classified as acute toxicity now, but the substance always has a specific UN number which falls in DG Class 6.1. For example, the substance “Dichloromethane” , which is transported under UN1593. Its GHS classification is Carc. 2 H351. No acute toxicity is applied. In this case, we won’ t forcibly add toxicity categories to this substance in section 2.
- 2) Another example is that the product is classified as skin corrosive and it should be transported under DG Class 8. However, due to special provisions or limited quantity exceptions or other reasons, the product is transported as non-Dangerous Goods. In this case, we suggest clarifying the situation, indicating the special provisions or any other exemptions applied to the product clearly in the section 14.

Q5: In section 3, Can we consider polymers under 3.1 substance section of SDS.

A5: In section 3, what we need is the composition of the chemical product, if the product is a polymer, we will put the information of the polymer (a special mixture) in section 3. As we know, the registration of the monomers of the polymer may be done. In that case, we will also put the monomer information in section 3, and list the registration number or some registration information together. However the complete SDS will still be prepared based on the polymer like section 9-12.

Q6: Is there any exemption on SDS/label for small volume chemicals?

A6: There’ s no exemption. The SDS is authored based on the hazard information of the chemicals, no matter it’ s in small volume or large volume, if it is classified based on the compositions. For labels, we do can find more volume exemptions, especially for a small package which has not enough space for labels, some region will have some exemption on certain label elements.

Q7: How do we know if our liquid chemical sample should be classified as flammable or not?

A7: To carry out the flashpoint and boiling testing. For mixture product, you can check each components firstly, if all of them are non -flammable that may not need to do the flashpoint testing, if any of them is flammable, you need to make a test and find out the flashpoint or and boiling temperature The classification criteria can be found in the chapter of the flammable liquids. Generally if your liquid chemical products has a flashpoint below 60 °C ,the products are likely to be classified as flammable liquids.

Q8: Could you give a brief introduction of harmonized GHS classification.

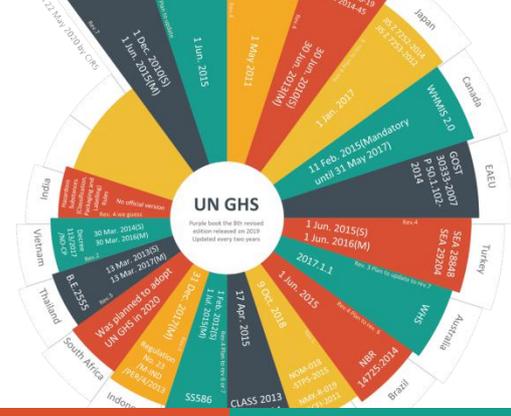
A8: The GHS stands for Globally Harmonized System. It was firstly raised in 1992 “Earth Summit” that “A globally harmonized hazard classification and compatible labelling system, including material safety data sheets and easily understandable symbols, should be available if feasible, by the year



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2000” . The first edition of the GHS, which was intended to serve as the initial basis for the global implementation of the system, was adopted in December 2002 and published in 2003. Since then, the GHS has been updated, revised and improved every two years as needs arise and experience is gained in its implementation.

Q9: I think in EU, currently ATP 13 is in implemented since May 2020.

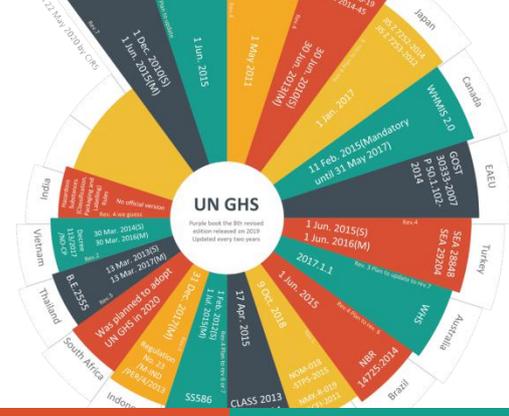
A9:There are 12th , 13th and 14th ATP.

The 12th ATP implements the 6th and 7th amendments of the purple book. The changes will apply from October 2020.

13th and 14th ATP include updates to the Annex VI of CLP. The 13Th ATP applied from May 2020. The 14th ATP will apply from September 2021.

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## Brief introduction of this series course

Due to the the outbreak of COVID-19 we have been unable to provide this training in the usual face to face manner. CIRS is proud to announce a series of training webinars on Global GHS regulations for our clients who may be:

- Product Safety and Regulatory Affairs Professionals
- Purchasing or Sourcing Manager - Chemicals
- EHS Professionals and Consultants
- MSDS Author and Hazard Communication Officer
- Product Registration Specialist
- Import/Export Manager - Chemicals

This series of training course is initiated and planned by David Wan, the Managing Director of CIRS Ireland. Information correctness and completeness is guided by Cloris Pan, the Leader of CIRS GHS service center. Webinars are provided by CIRS in conjunction with our partners in Japan (JEMAI) and Russia (ECOMOLE & Ecovostok).

This course includes webinars activities and advanced articles.

### Webinars Content:

1. Series Introduction and Global GHS (July 1, 2020)
2. EAEU GHS features and EAEU-REACH (July 8, 2020)
3. Korea GHS features and local regulations (July 15, 2020)
4. China GHS features and local regulations (July 22, 2020)
5. Japan GHS features and local regulations (July 29, 2020)
6. CLP and SCIP Database Dean Winder (August 5, 2020)
7. Does article need to comply with GHS (August 12, 2020)
8. How to keep your CBI in secret during hazard communication (August 19, 2020)
9. The emergency contact number required in Global GHS SDS (August 26, 2020)
10. What makes the classification difference (September 2, 2020)
11. GHS labelling for small and awkward packages (September 9, 2020)
12. Global GHS advanced and series closure (September 16, 2020)

### Advanced Articles([click here](#))

**Time:** Every Wednesday from 1 July to 16 September 2020, 15:00pm (GMT+1)/10:00am (PST), except the one in 8 Jul., which will be held on 16:00pm (GMT+1).([click here to register](#))