

## China GHS features and local regulations (July 22, 2020)

Q1: For China SDS section 3, if there is component is CMR and concentration is above 0.1%, but it is impurity in mixture, should it be listed in SDS section 3?

A1: Due to the regulations surrounding Hazardous Chemicals (including CMR) if they are present in the mixture above the concentration threshold, it must be stated in the SDS.

Q2: Can OEL substance be CBI in section 3? is there any threshold for disclose for OEL?

A2: According to the regulations surrounding CBI are as follows; CAS number and the exact concentration of each ingredient could be kept as confidential but relevant hazards information shall be indicated. Due to this an OEL substance is considered as hazardous information and must be disclosed. There isn't a specified threshold for disclose for OEL mentioned in GB standards.

Q3: As I know, there is no obligation to add the concentration range in section 3 correct? can you confirm that section should include concentration range and hazard of each chemical?

A3: According to the GB17519-2013 in China, in section 3, the concentrations or concentration ranges for all hazardous components (above cut-off value) are required.

Q4: For section 14 UN shipping name, if in section 3 it is trade secret name, then in section 14, should it be trade secret name or list details?

A4: In section 14 for the UN shipping name you must report the proper shipping name of the chemical.

Q5: What is the minimum regulatory information should be listed in CN section 15?

A5: The regulatory information in the section 15 is flexible. We suggest China chemical regulations should be listed, e.g. IECSC, Catalog of Hazardous Chemical in China, List of Toxic Chemicals Restricted to be Imported/Exported, List of Hazardous Chemicals for Priority Management- SAWS, etc.

Q6: If a substance is in level 2 in No.7, now with No. 12, will it be in "regular band"? Or it needs some work to be in?

A6: Regular registration will still be required under MEE No.12.

Q7: In general, how does No. 7 (four bands) merges into No 12 (2 bands)?

A7:

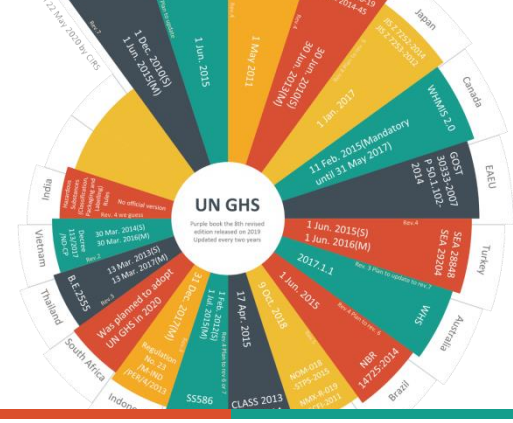
- For >10 tonnage band (10-100, 100-1000, >1000), it will become regular registration under MEE



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No.12 and the data requirement will be same.

- For 1-10 tonnage band, it will become simplified registration under MEE No. 12. Only physicochemical and several eco-toxicity tests will be required.

Q8: How composition range in section 3 of SDS is decided for China SDS.?

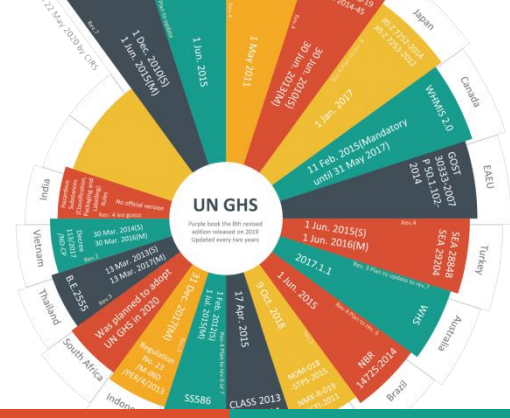
A8: According to the regulations in China, you must state the concentration range in section 3 of the SDS for each substance. Unlike other countries the exact range is not as strict and as such there is some variability of the ranges stated.

Q9: There are conflicts in GHS and DG classification which gets questioned at the customs. How can this be handled?

A9: It has to be studied case by case. Normally the GHS and DG classification should be consistent. There are conflict cases. If the substance itself does have a specified UN number, the UN number has to be used, which may not be consistent with the GHS classification. This situation can be explained to the customs.

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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](#))

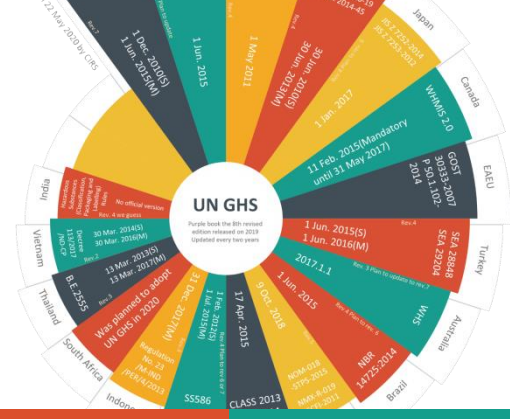
**Time:** Every Wednesday from 1 July to 16 September 2020, 15:00pm (GMT+1)/10:00am (PST), except



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the one in 8 Jul., which will be held on 16:00pm (GMT+1).([click here to register](#))