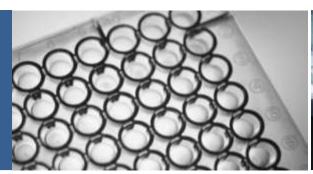


#### Interpretation and FAQ on China SDS and Labelling





Global Chemical
Regulatory Compliance



Li Xiang
Business Development Manager
CIRS Europe
li.xiang@cirs-reach.com

#### Who is CIRS?





- CIRS is an individual consulting firm founded in 2007 and headquartered in China;
- Has 350+ employees;
- Branch offices in Dublin(Ireland), London (UK), Arlington(US), Seoul (Korea), Nanjing(China), Beijing(China), Hangzhou(China);
- CIRS provides regulatory compliance consulting, testing and training services.
- CIRS shares more than 70% Chinese consulting markets;
- Has 4000+ Clients across the world

#### **CIRS China (HQ)**

Add: 11/F., Bldg 1, Dongguan Hi-Tech Park, 288 Qiuyi Rd, Binjiang District, Hangzhou, China

#### **CIRS Europe**

Add: CIRS, Regus Harcourt Centre D02 HW77, Dublin, Ireland

#### **CIRS US**

Add: #200-092, 3100 Clarendon Blvd., Arlington, VA 22201

#### **CIRS Korea**

Add: B-2310, 583, Yangcheon-ro, Gangseo-gu, Seoul, Republic of Korea

#### **CIRS UK**

Studio 310, Pill Box, 115 Coventry Road, London, E2 6GG







- 1. Information about the Webinar Series
- 2. China GHS Standards
- 3. China GHS Classification
- 4. Safety Data Sheet
- 5. China GHS Labelling
- 6. Common Errors and CIRS Advice





## Information about the Webinar Series

#### Schedule



- 1. Serial Webinar Opening & Latest Updates of EU & UK CLP Mr. Dean Winder
- 2. CLP Compliance in retail supply chain Mr. Bryan Zhou
- 3. Introduction of Turkey GHS and KKDIK Updates Mrs. Elif Koç, Mr Gökhan Ardıç
- 4. Latest Updates of the South Korean OSHA amendment Julie Harrington.
- 5. Interpretation and FAQ on China SDS and Labelling Mr. Li Xiang

Every Wednesday from 23<sup>rd</sup> of June to 21<sup>st</sup> of July 2021 14:00 (GMT+1)/9:00am (PST)

#### Making the most of the Series



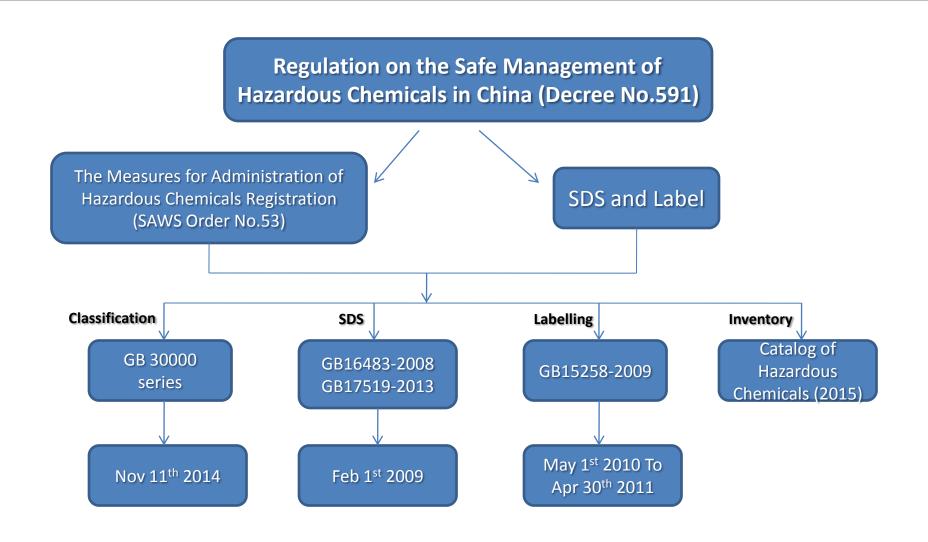
- Send us your questions
- Request the Presentations for free
- Keep up to date with our Advanced Articles
- Consult our FAQ Documents



# O2 China GHS Standards



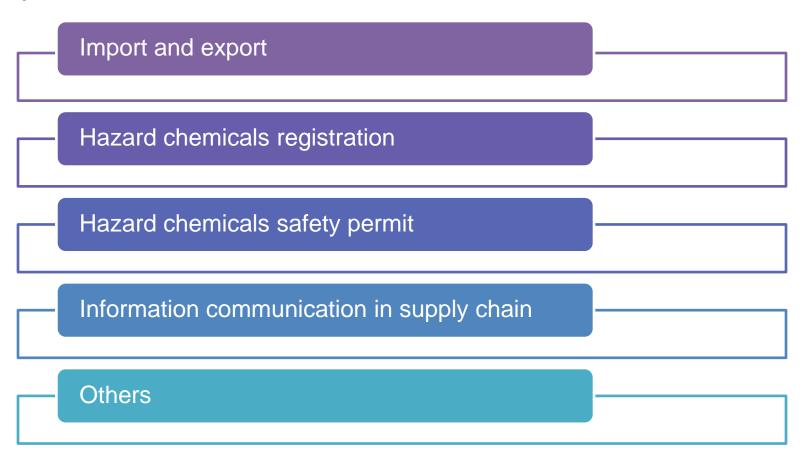
#### **China GHS Standards**





#### **GHS Implementation in China**

#### **Scope of China GHS**







### China GHS Classification

#### **China GHS Classification**



Classification Standards: GB 30000.2~29-2013 (effect on Nov 1, 2014)

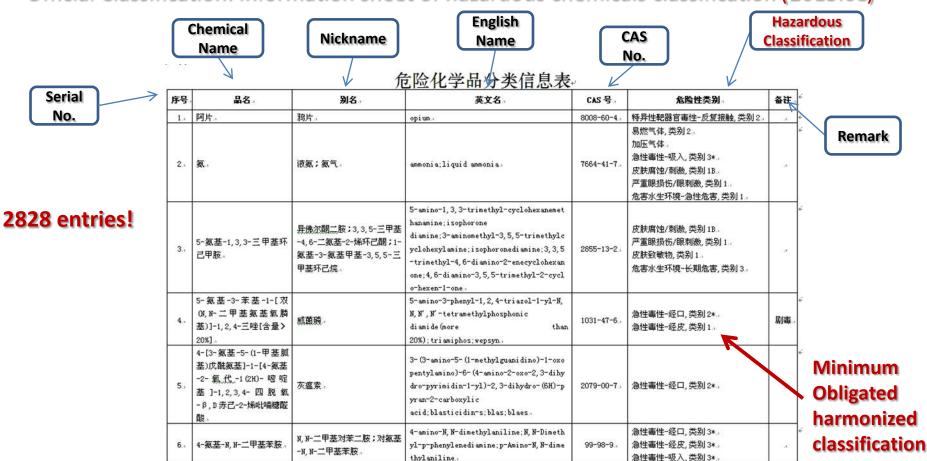
Fully adopt UN GHS Rev. 4, 28 hazard classes, including Aspiration hazards and Hazards to the ozone layer;

Physical Hazards 16 Classes	Explosive, Flammable gases, Flammable aerosols, Oxidising gases, Gas under pressure, Flammable liquids, Flammable solids, Pyrophoric liquids, Pyrophoric solids, Self-heating substances and mixtures, substances and mixtures which are in contact with water emit flammable gases, Oxidising liquids, Oxidising solids, Organic peroxides, Corrosive to metals, Self-reactive substances and mixtures.
Health Hazards 10 Classes	Acute toxicity, Skin corrosion/irritation, Serious eye damage/irritation, Respiratory or skin sensitization, Germ cell mutagenicity, Carcinogenicity, Reproductive toxicity, Specific target organ toxicity- single exposure, Specific target organ toxicity-repeated exposure, Aspiration Hazard(*)
Environmental Hazards 2 Classes	Hazardous to the aquatic environment Hazardous to ozone layer

#### **China GHS Classification**



#### Official Classification: Information sheet of hazardous chemicals classification (2015.08)









GB 16483-2008 National Standard on Safety Data Sheet For Chemical Products
GB 17519-2013 Guidance on the compilation of safety data sheet for chemical products

- > The SDS should be written in Chinese;
- For foreign manufacturer, Chinese domestic 24h emergency number is mandatory to provide in section 1 if it's hazardous chemical;
- Volume fraction or concentration range of ingredients should follow descending order;
- CBI: the CAS number and exact concentration of each ingredient could be kept as confidential but relevant hazards information shall be indicated.

1.Identification	9. Physical and Chemical Properties
2. Hazard overview	10. Stability and reactivity
3. Composition/information on ingredients	11. Toxicological information
4. First-aid measures	12. Ecological information
5. Fire-fighting measures	13. Disposal
6. Accidental release measures	14. Transport Information
7. Handling and storage	15. Regulatory information
8. Exposure controls/personal protection	16. Other information

#### **China SDS Handbook**



#### 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





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#### **Section 1 Identification**

- Product Name (both in Chinese and English)
- Recommended Application and Restricted Application
- Supplier Identification
- Emergency Phone Number

Chinese Domestic & 24 Hour Available

www.cirs-group.com

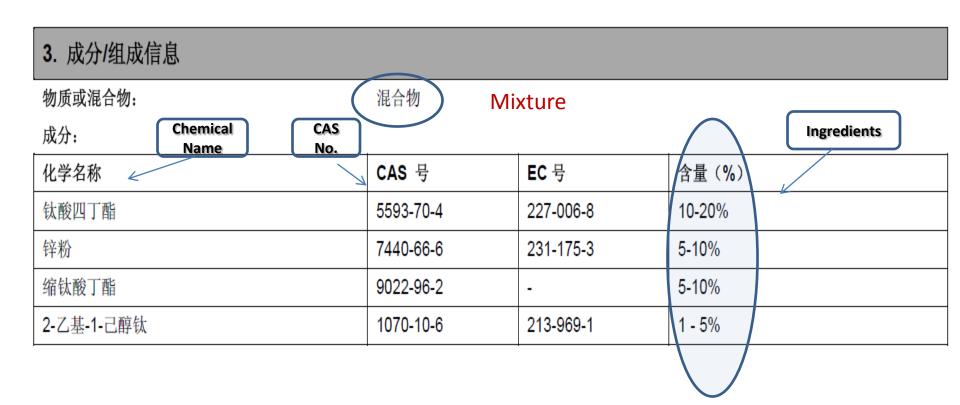


#### **Section 2 Hazard Identification**





#### **Section 3 Composition/Information on Ingredients**





#### **Section 3**



<b>Hazard Category</b>		Cut-Off Value (%)					
Acute Toxicity		≥1.0					
Skin Corrosion/Irrit	ation	≥1.0					
Serious Eye Damag	e/Eye Irritation	≥1.0					
Respiratory or Skin	Sensitization	≥0.1					
Germ Cell	Category 1	≥0.1					
Mutagenicity	Category 2	≥1.0					
Carcinogenicity		≥0.1					
Reproductive Toxic	ity	≥0.1					
STOT- Single Exposure		≥1.0					
STOT – Repeated Exposure		≥1.0					
	Category 1	≥10 and dynamic viscosity≤20.5 mm <sup>2</sup> /s (40°C)					
Aspiration Hazard	Category 2	≥10 and dynamic viscosity≤14 mm²/s (40°C)					
Hazardous to the aqu	atic environment	≥1.0					



#### **Section 8** Exposure Controls/ Personal Protection

GBZ 2.1-2019: occupational exposure limits for hazardous agents in the workplace

接触控制和个人防护

8.1 接触控制:

8.1.1 容许浓度:

乙酸-1-甲氧基-2-丙基酯

(CAS# 108-65-6)

1-甲氧基-2-丙醇

(CAS# 107-98-2)

IOELV(EU)

TLV(RC)

TLV(EU)

REL(USA)

**MAC:** Maximum Allowable Concentration

**PC-TWA:** Permissible Concentration-Time

Weighted Average

**PC-STEL:** Permissible concentration-Short Term

**Exposure Limit** 

短期价值: 550mg/m³, 100ppm

长期价值: 275mg/m³, 50ppm

369mg/m<sup>3</sup>, 100ppm

短期价值: 568mg/m³, 150ppm

长期价值: 375mg/m³, 100ppm

短期价值: 540mg/m³, 150ppm

#### 生物接触限值

生物接触限值:							
组分名称	标准来源	生物监测指标	生物限值	采样时间			
二甲苯	ACGIH(2009)	尿中甲基马尿酸	1.5 g/g 肌酐	班末			



#### **Section 9 Physical and Chemical Properties**

Appearance (Form, Colour, State)	Vapor Pressure
Odour	Vapor Density
pH and concentration	Density/Relative Density
Melting Points/Freezing Point	Water Solubility
Boiling Point, Initial Boiling Point, Boiling Range	Partition coefficient n-octanol/water
Flash Point	Autoignition Temperature
Combustion Limit/Exposure Limit	Deacomposition Temperature



#### **Section 11 Toxicological Information**

Acute Toxicity	Carcinogenicity
Skin Corrosion/Irritation	Reproductive Toxicity
Eye Damage	STOT- Single Exposure
Respiratory/Skin Sensitization	STOT- Repeated Exposure
Germ cell mutagenicity	Aspiration Hazard



#### **Section 12 Ecological Information**

- ➤ Information of ecotoxicity;
- Durability and degradability;
- ➤ Potential bioaccumulation;
- ➤ Mobility in the soil.

More experimental data or ecological cut-off value is welcome!



#### **Section 14 Transport Information**

- >UN Number
- **≻**UN Shipping Name
- ► Hazard Classification of UN
- ➤ Packaging Categories
- ➤ Marine Pollutant
- ➤ Special Precautions for Users

**Land Transportation** 

**Inland Water Transportation** 

**Maritime Transportation** 

**Air Transportation** 



#### **Section 15 Regulatory Information**

#### 15.Regulatory Information

#### 15.1 Safety, health and environmental regulations/legislation specific for the substance or mixture

Regulations names	information	Q		
Degulations on the sefety administration of	Catalog of Hazardous Chemicals	Styrene listed		
Regulations on the safety administration of dangerous chemicals	List of Hazardous Chemicals for Priority  Management	Styrene listed		
	Catalog of Highly Toxic Chemicals	Not listed		
Regulations on labor protection in workplaces where toxic substances are used	Catalog of Highly Toxic substances	Not listed		
Regulations on the environmental management of first import of toxic chemicals	List of Toxic Chemicals Restricted to be Imported/Exported	Not listed		
Measures for environmental management of new chemical substances	Inventory of Existing Chemical Substances Produced or Imported in China (IECSC)	Styrene, Acrylic acid 3-(4- {1-[4-(2-acryloyloxy-2-hydroxy-ethox y)-phenyl]-1-methyl-ethyl}-phenoxy)- 2-hydroxyl -propyl ester listed		

#### 15.2 Downstream users precautions:

Disposal of products/containers according to local regulations.





## China GHS Labelling



#### GB 15258-2009 National Standard on General Rules for Preparation of Precautionary Label for Chemicals

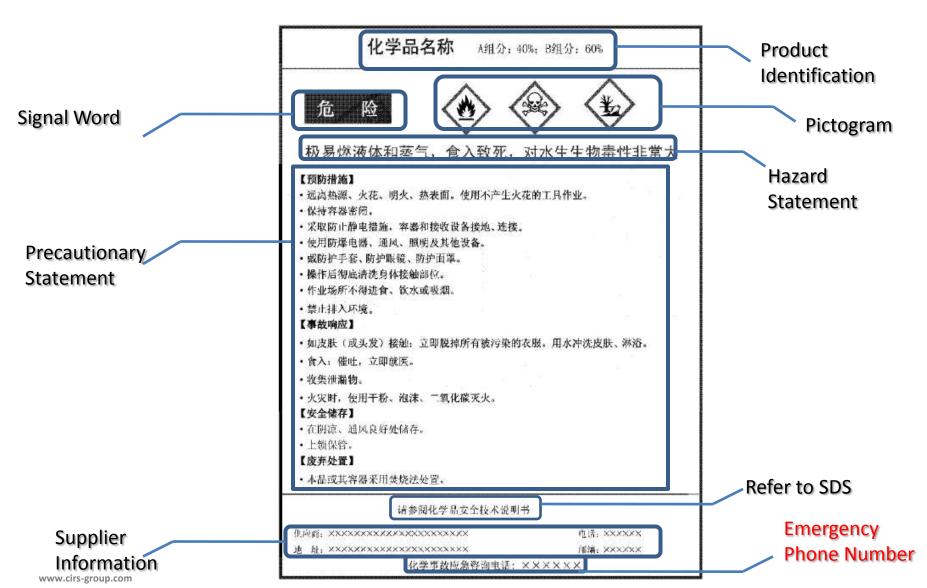
#### **Special Requirements:**

- > Chemical name should be in both Chinese and English.
- For foreign manufacturer, a least one Chinese domestic 24h emergency number shall be provided in section 1.
- $\triangleright$  Order of hazard statements: Physical Hazards > Health Hazards > Environmental Hazards.
- > No more than 5 of hazard chemical ingredients should be listed (Not mandatory)
- A simplified label is applied to the package whose volume is less than 100ml.

#### **Label Size**

Container or Package capacity (L)	Label Size		
Capa. ≤0.1	simplified label		
0.1 <capa.≤3< td=""><td>50*75</td></capa.≤3<>	50*75		
3 <capa.≤50< td=""><td colspan="3">75*100</td></capa.≤50<>	75*100		
50 < Capa. ≤ 500	100*150		
500 < Capa. ≤ 1000	150*200		
1000 < Capa.	200*300		

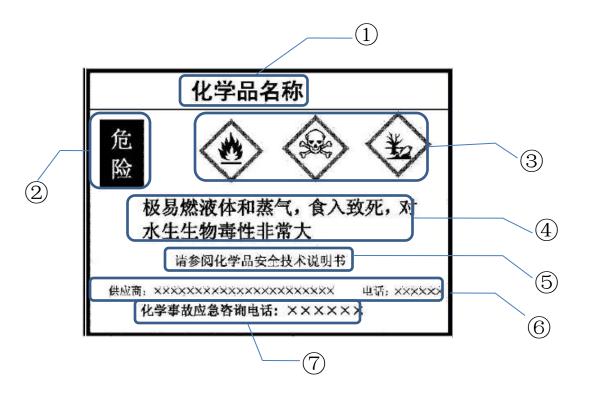




## **CIRS**

#### Simplified Label (≤100 ml)

GB15258-2009



- Product identification
- 2. Signal word
- 3. Pictogram
- 4. Hazard Statement
- 5. Refer to SDS
- 6. Supplier name and contact number
- 7. Emergency phone number

Precautionary Statement is omitted!



#### **Packaging**









## **Common Errors and CIRS Advice**

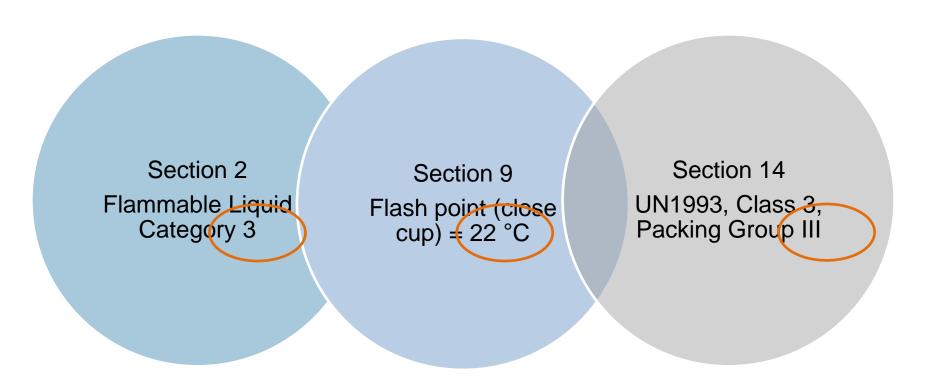
#### **Common Errors on Chinese SDS & labels**



Not following the Chinese GHS standards Lacking of product name (CN&EN) Incorrect languages & wrong 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".

#### **Compliance Advice from CIRS**



- 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
- Have essential knowledge of China GHS regulation
  - Classification GB 30000.2-28-2013
  - Chinese SDS GB/T 16483-2008 and GB/T 17519-2013
  - Chinese GHS label GB 15258-2009
- Communicate with supplier and clients for China GHS compliance
- Monitor regulation updates
- Trust professional firm to update the SDS and label in time

#### **CIRS Service**



- China SDS and Label Review
- 24hrs Emergency Telephone Number Service
- Hazardous Chemical Registration
- China SDS Authoring and Labelling
- China harmonized Classifications search of hazardous chemical inventory
- China REACH Notification

