GHS Professional FAQs – Q3 2021

Regulatory FAQs

Q. Looking at the reference database for the OEL of wollastonite (CAS number 13983-17-0) it says there is a limit in the Netherlands, but it's not pulling through to the Dutch SDS. Why is this?

A. As of 2007 the Dutch OEL system was modified, is now spilt into 'Private' OELS and 'Public' OELS.

Public OELS are from the legally binding Appendix XIII of the working conditions regulations. These are downloaded as normal as part of the Ref DB system.

Private OELS found in the SER database, have been set by individual companies, and cover a wider range of chemicals than the legislative text. These OELS are recommendations and not legally binding but are highly suggested as they will have been set by companies responsible for the safe handling of the chemical within the workplace. These will not be downloaded automatically from the Ref DB as it is up to the user to decide which if any of the data is relevant.

Q. One of our customers has commented that an ingredient listed in Section 14 PSN (N.O.S part) is not listed in section 3 of the safety data sheet. Is this a requirement that only components listed in Section 3 can be mentioned for the N.O.S part of the Proper Shipping Name?

A. In accordance with section 3.1.2.8 of ADR, N.O.S or generic proper shipping name entries assigned special provision 274 must include not more than the two constituents which most predominantly contribute to the hazard or hazards of the mixture. With regards to the standard base product this refers to the constituents that contribute to the environmentally hazardous nature of the material.

In ADR or REACH, it technically does not state that there is a requirement that only components listed in Section 3 can be mentioned for the N.O.S part of the Proper Shipping Name.

However, given that environmental hazard classification under CLP is aligned with transport classification, it does seem unusual that the chemical would not appear in both sections. Components that contribute to the CLP environmental hazard classification and appear in section 3 should usually be the same components that contribute to the transport environmental hazard.

Q. A customer has noted that Eye Irrit and Skin Sens are not translated from English into German. Where can I get the official translations for these?

A. As far as the CLP regs are concerned there is no official list of the Hazard classification abbreviations, and in the German 10th ATP of CLP (776/2017) they use the English versions:

Index-Nr.	Internationale chemische Bezeichnung	EG-Nr.	CAS-Nr.	Einstufung		Kennzeichnung			Spezifische Konzentrations-grenzen, M-Faktoren und ATE	Anmer-kungen
				Gefahrenklasse, Gefahrenkategorie und Gefahrenkodie-rung	Kodierung der Gefahrenhin-weise	Pikto-gramm, Kodierung der Signal-worte	Kodierung der Gefahrenhin-weise	Kodierung der ergän-zenden Gefahren-merkmale		
„606-041-00-6	2-Methyl-1-(4-methylthio-phenyl)-2-morpholino-propan-1-on	400-600-6	71868-10-5	Repr. 1B Acute Tox. 4 * Aquatic Chronic 2	H360FD H302 H411	GHS08 GHS07 GHS09 Dgr	H360FD H302 H411“			

Q. We've just come across some info on a version of the ECHA Guidelines regarding products of two parts. We are about to start production of this type of product. The label mock-up we have created contains the hazards of both parts on one label

However, the guidance states that "two separate labels need to be affixed to the containers…"

Does this mean that our current label is non-compliant, and we should in fact have two separate distinct labels that directly relates to each part?

6.2 Specific case: labelling of two-component products

In certain specific cases the packaging of the product can be so unique that it is difficult to meet the CLP labelling requirements. An example of such a situation has been given below. Please note that the example only illustrates the general aspects of labelling of two component products and is not intended to present the correct selection of appropriate label elements.

Picture 1. Two-component adhesive sold as a kit (below) shows an example of a popular two-component adhesive consisting of two mixtures, namely an epoxy resin (Part A) and a hardener (Part B). The two mixtures are placed in separate containers which are fixed together and sold as a kit in transparent outer packaging. When used, the content of both containers is mixed by extrusion. Part A and Part B react to produce a final mixture which can be used as an adhesive for a wide range of materials.

In this type of situation two separate labels need to be affixed to the containers (one label for each mixture (in a container)). The hazard information provided on the labels must relate to the form/physical states in which both mixtures (Part A and Part B) are placed on the market. The outer packaging of the whole kit need not be labelled, as it is transparent and permits the inner packaging (both containers) to be clearly seen.

If the product formed during end-use is hazardous (with different properties to the mixtures in the containers), sufficient instructions to enable safe use must be provided to the user. The instructions can for example be provided on the label or as a separate leaflet in the package.

If such a product is not intended for the general public, two separate safety data sheets should be provided to enable the users to meet their responsibilities in relation to the management of risks arising from the use of the reaction product that occur upon the end use of the two mixtures (i.e. the adhesive).
As the adhesive in the example is also classified as hazardous, the relevant information about the risk management measures should be provided in the SDSs.

Please note: a case-by-case judgement may be necessary when determining the labelling requirements for similar, unique packagings. The information should not confuse the user and the label should be easily understandable.

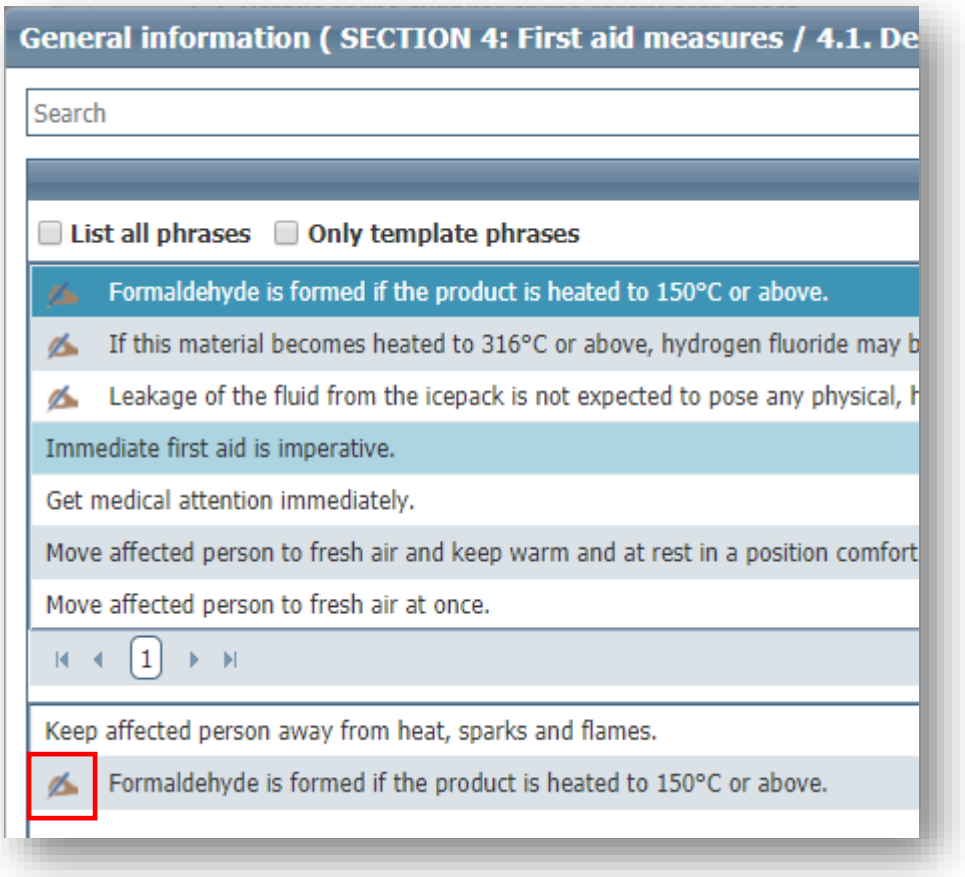
A. The guidance appears to be clear on how to ideally label these types of products, and as your mock-up label would not make it clear which hazards relate to which part of the product, this may be an issue, as it's possible for only one half of the packaging to split. Therefore, it should be easy to identify what the potential hazards are from that part of the product.

For a definitive answer regarding the compliance of your label, contact the HSE helpdesk, which can answer this type of question definitively for you. (UKREACHCA@hse.gsi.gov.uk) They are also obliged NOT to pass on any information to the enforcement team.

Support FAQs

Q. I've been editing an SDS and have added new phrases in various sections, but they are not all translating in all the markets that I have. Aren't all phrases translated?

A. Check whether the phrases in question are user added or not. User added phrases cannot be automatically translated by the system. Each translation for a user added phrase must be added manually by the user. To find out if the phrase is user added, enter the phrase maintenance window for the category the phrase is associated with. If the phrase is user added it will be denoted with a handwriting symbol:

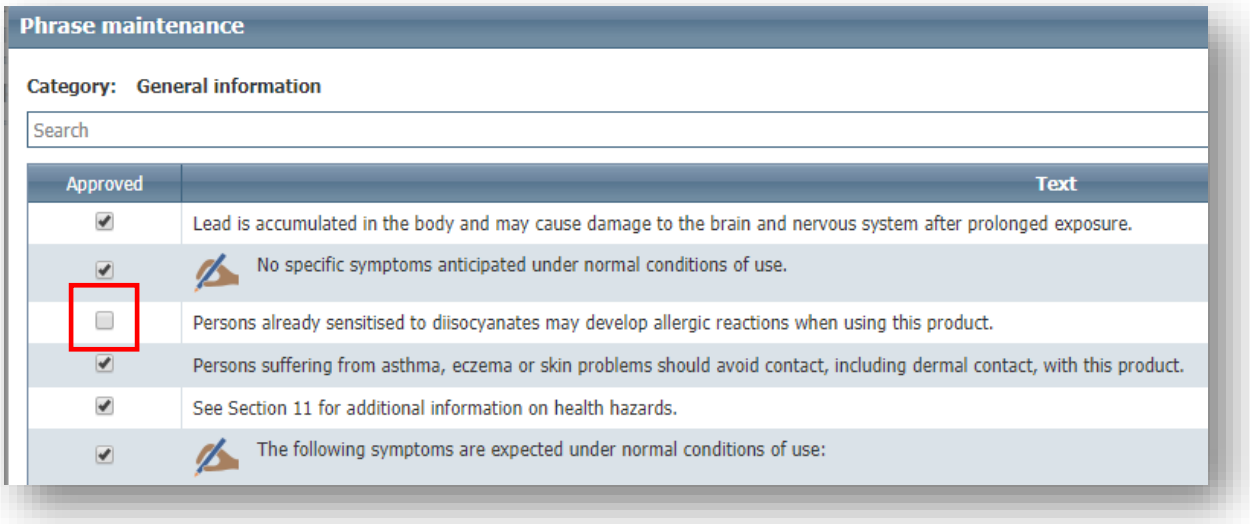


If the phrase in question *is* a system phrase, contact our support team (support-sq@ul.com) who will investigate further and log your query with the Translations team if needed.

Q. I'm searching for a phrase, but I can't find it at all, even when show all is listed. I know it's in the system as I have used it before and can see it in other SDSs that I've created. Why can't I see it?

A. The phrase is most likely to have been deactivated by a user at some point. To check this, go to phrase maintenance in the category that the phrase belongs to and check that the approval check

box is ticked for the phrase in question. If it isn't, therefore it can't be found. Check the box to make it available again.

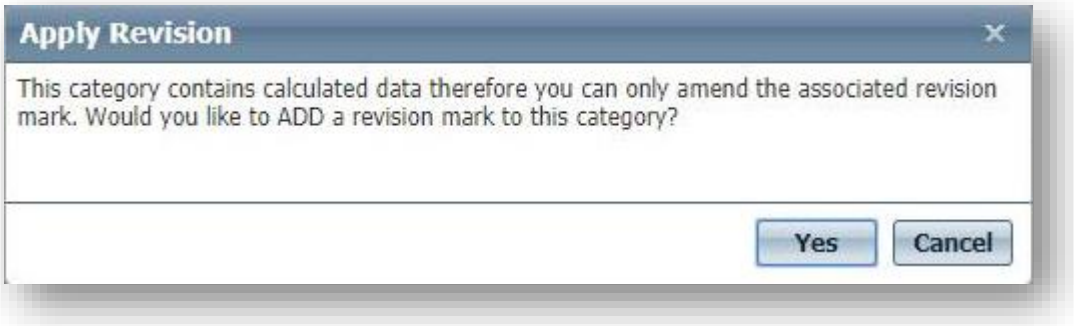


Q: I need to create some new user logins for Chemlabel. Do I need to set up the users individually on each Chemlabel client or can I do it all from my Chemlabel client and will this affect my licensing?

A: You can create all chemlabel logins from one Chemlabel client as the credentials are stored centrally in the database and not local to the client.

The licensing model for Chemlabel is per machine. So, if you have purchased 3 licensed you can only install Chemlabel on 3 PCs. But you can create as many individual logins as you like.

Q: I'm trying to edit some data in Report Editor in GHS Pro, but when I click on the category, I need to change I get the message below. How can I edit this data?

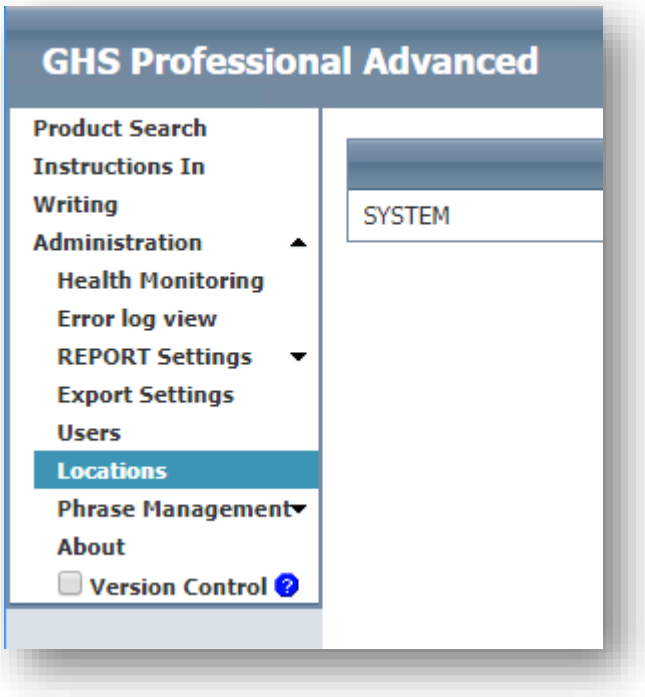


A: Any calculated data in GHS Pro is managed from Formulation Editor. This includes Hazard and precautionary information and ingredient disclosure information. Calculated data is found in sections 2, 3 (Inters and Mixtures), 11 and 12.

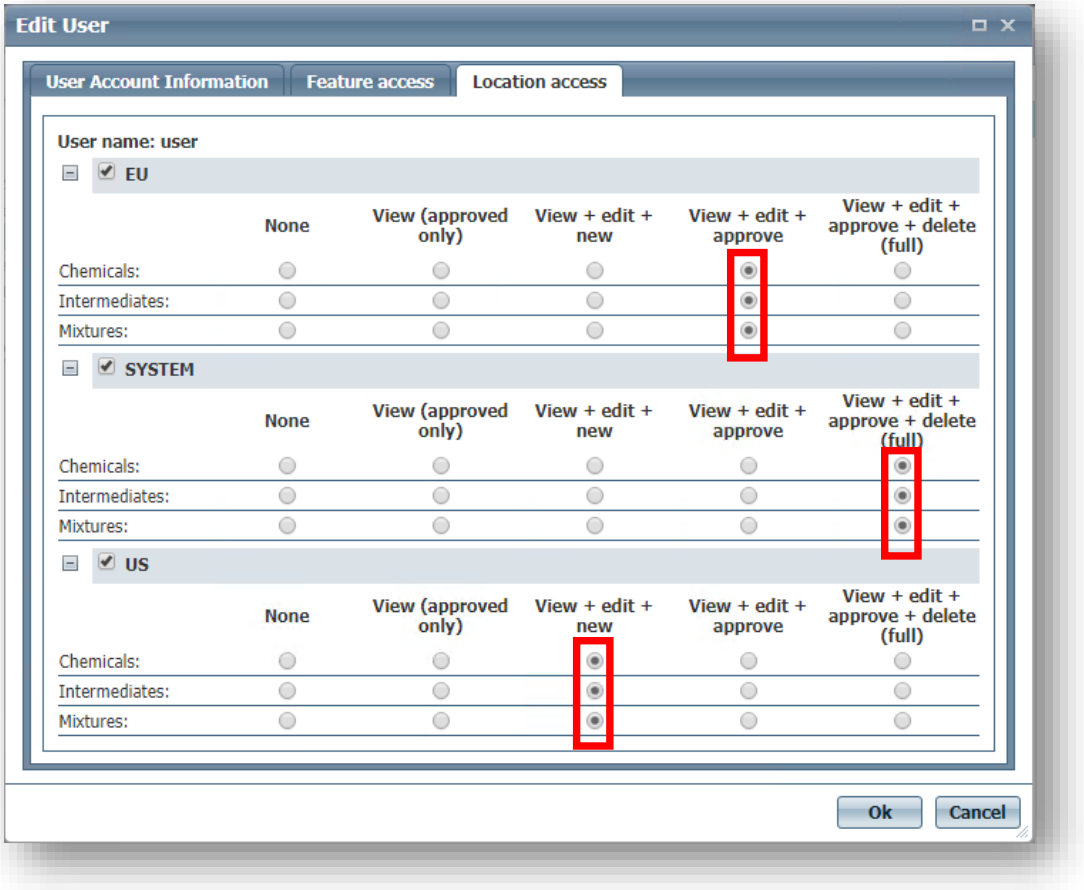
Did You Know…

Locations

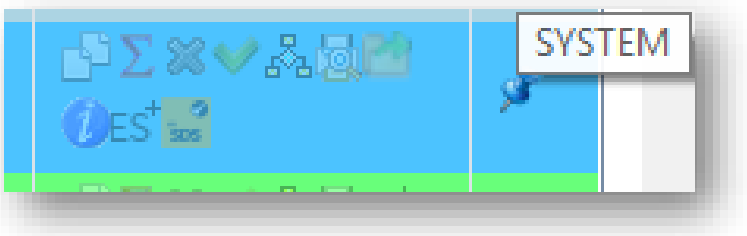
Did you know it's possible to have multiple locations within GHS Pro. Locations can be used to divide the database between different departments within a business. Locations are added from Administration but are limited.



Users can then be assigned the appropriate permissions to all locations. This is done from Users under Administration. Edit the user and assign permissions as required.



It is also possible to tell which location a product has been created in to determine a user's permission level to that product. To do this hover over the pin icon to reveal the location.

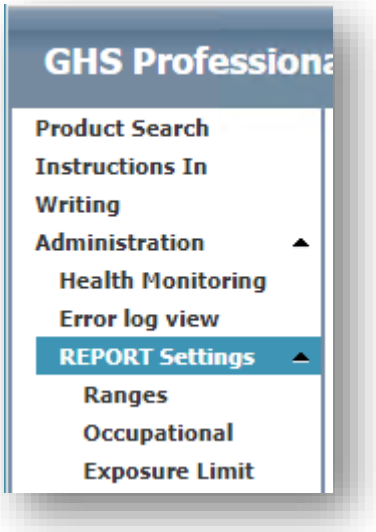


Concentration Ranges and OEL Limits

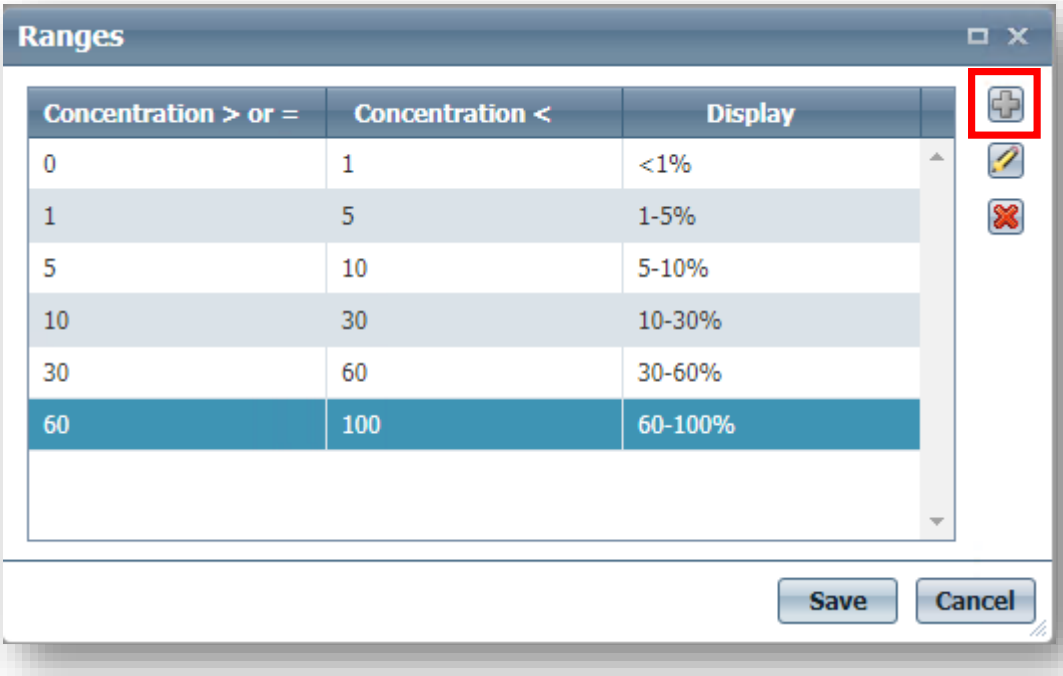
Did you know that you can set your own concentration ranges and OEL limits within GHS Pro? You are not tied to the default system levels. This is done from Report Settings under Administration.

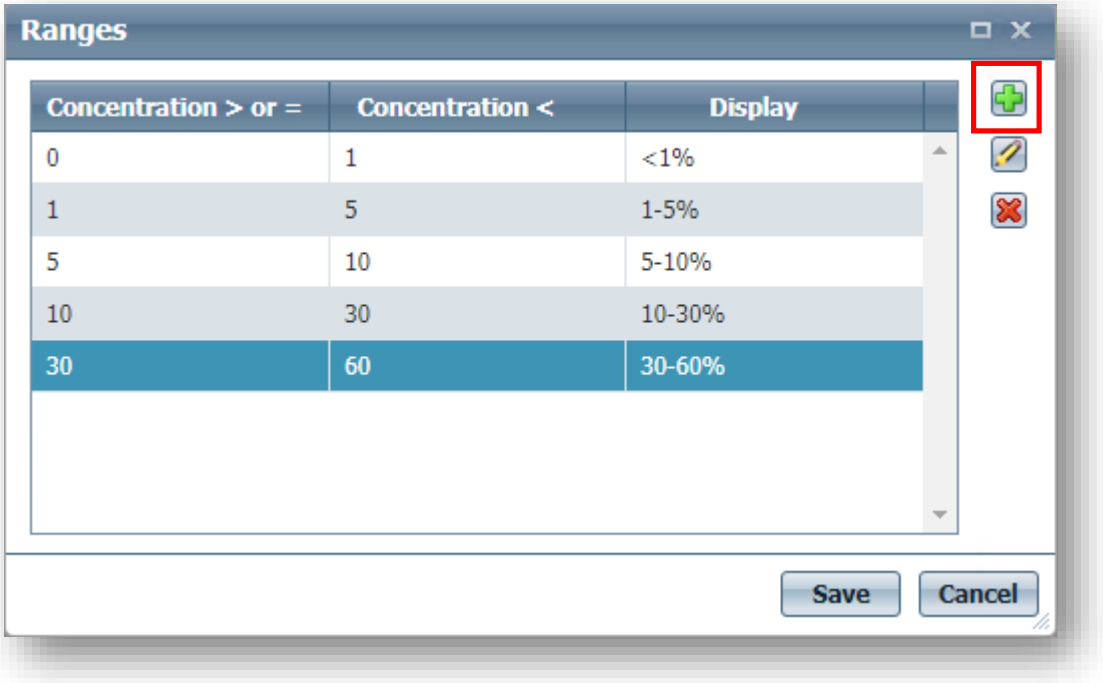
Setting Concentration Ranges

This function is used to set the concentrations ranges in section 3 for the ingredients. When used, the range should describe the effects of the highest concentration of each ingredient. Changes here are global and affect all markets.



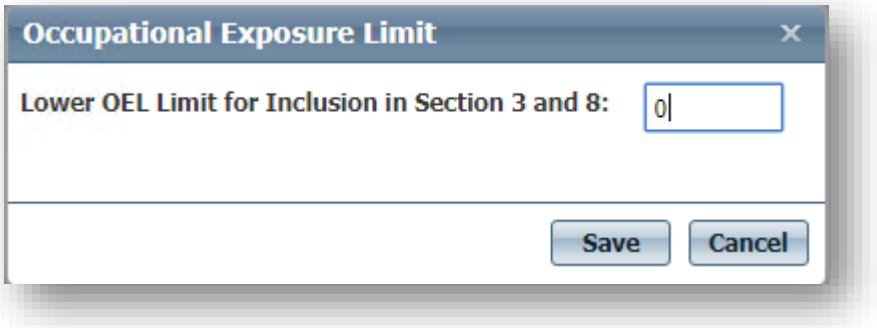
Edit the ranges as required via the new, edit and delete icons. If the current ranges amount to 100% you will not be able to add more, the add button will be greyed out. Edit or delete an existing range to activate the new button.





Setting OEL Limits

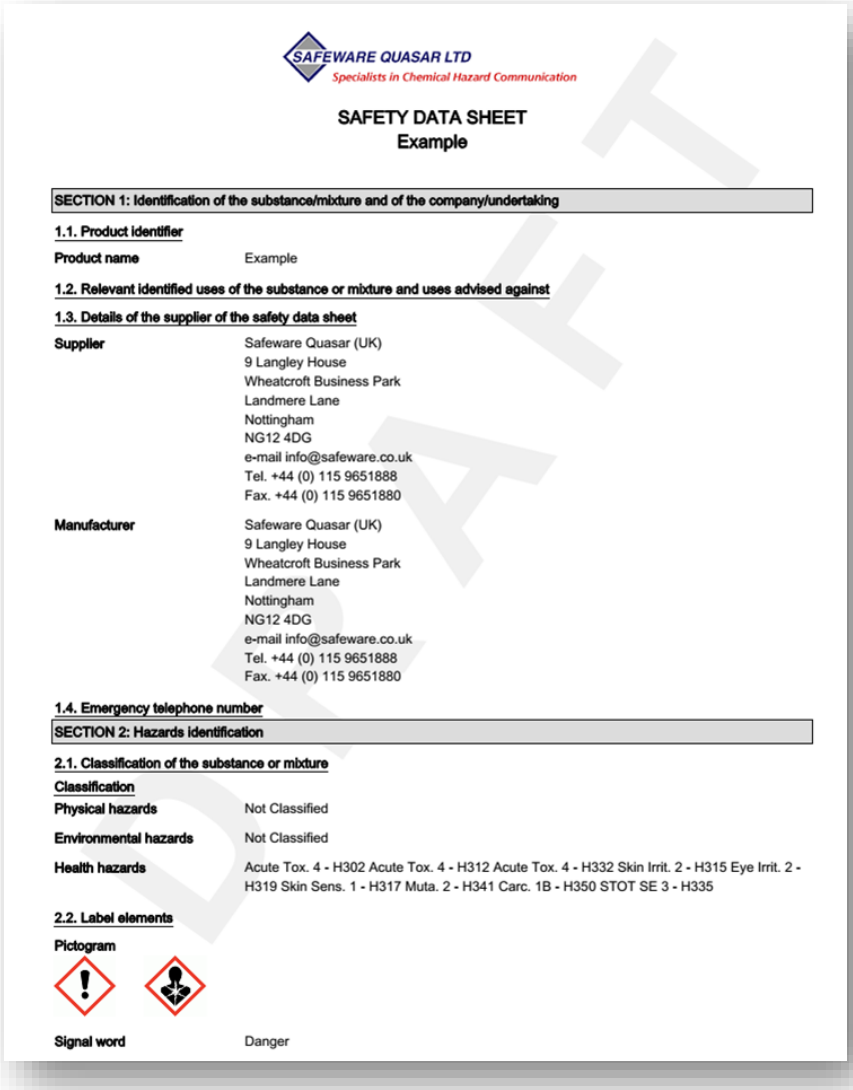
This function is used to determine at what concentration an ingredient will have its OELs appear in section 8. This then potentially triggers the appearance of the chemical in the list in section 3. Changes here are global and affect all markets.



This is the lower limit at which substances will be ignored if they were going to be displayed in section 3.2 due to OELs only.

DRAFT Watermarks

Did you know that the unapproved version of an SDS will have a watermark with the word ‘DRAFT’ across it in report preview? This is to help users easily identify the version of the document they are viewing.



SAFEWARE QUASAR LTD
Specialists in Chemical Hazard Communication

SAFETY DATA SHEET
Example

SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1. Product identifier

Product name Example

1.2. Relevant identified uses of the substance or mixture and uses advised against

1.3. Details of the supplier of the safety data sheet

Supplier
Safeware Quasar (UK)
9 Langley House
Wheatcroft Business Park
Landmere Lane
Nottingham
NG12 4DG
e-mail info@safeware.co.uk
Tel. +44 (0) 115 9651888
Fax. +44 (0) 115 9651880

Manufacturer
Safeware Quasar (UK)
9 Langley House
Wheatcroft Business Park
Landmere Lane
Nottingham
NG12 4DG
e-mail info@safeware.co.uk
Tel. +44 (0) 115 9651888
Fax. +44 (0) 115 9651880

1.4. Emergency telephone number

SECTION 2: Hazards identification

2.1. Classification of the substance or mixture

Classification

Physical hazards Not Classified

Environmental hazards Not Classified

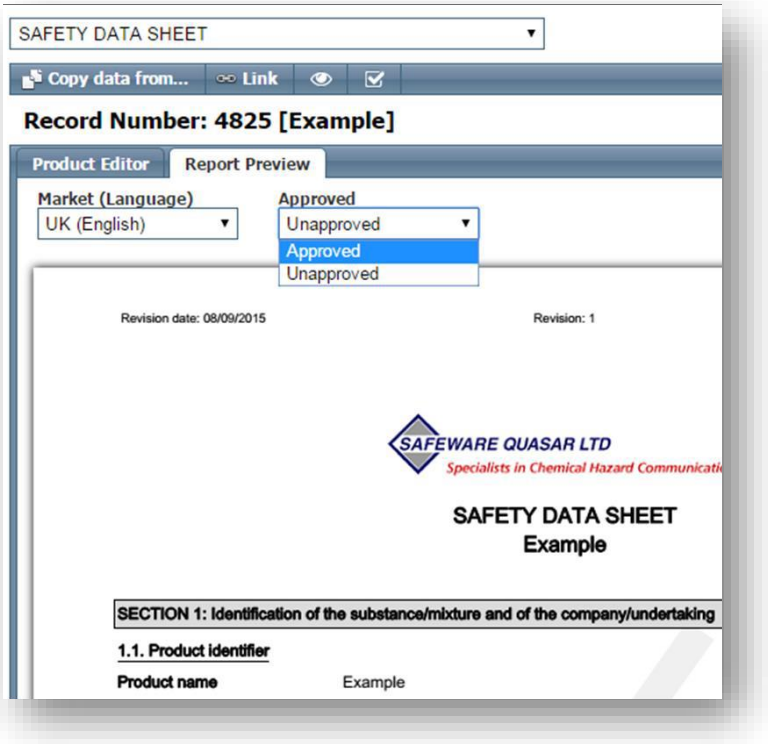
Health hazards Acute Tox. 4 - H302 Acute Tox. 4 - H312 Acute Tox. 4 - H332 Skin Irrit. 2 - H315 Eye Irrit. 2 - H319 Skin Sens. 1 - H317 Muta. 2 - H341 Carc. 1B - H350 STOT SE 3 - H335

2.2. Label elements

Pictogram

Signal word Danger

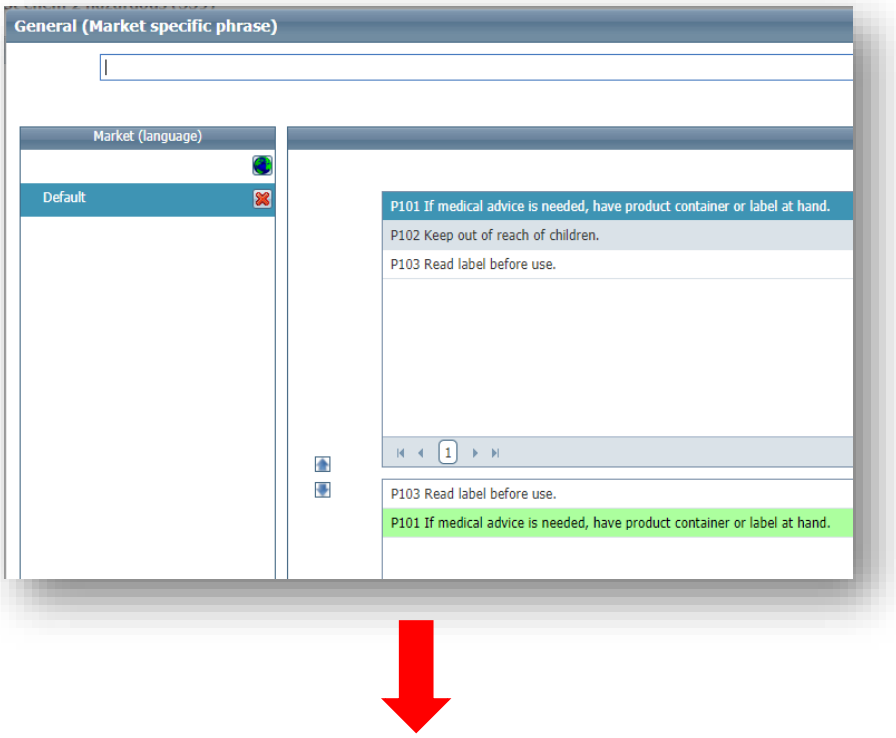
You can easily switch between the approved and unapproved versions of an SDS in report preview by selecting the required version in the Approved drop-down list.

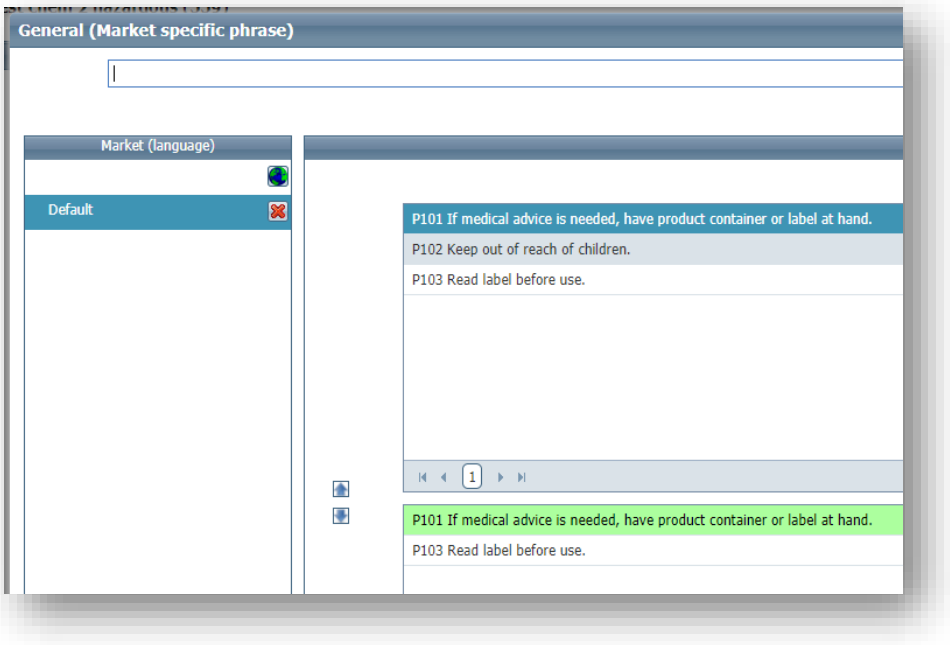


To remove the draft watermark, commit the changes by approving the SDS.

Reordering P Phrases

Did you know that it's possible to re-order P phrases in Label Overview? Click on the pencil icon for a category to open the phrase selection window. You can then left click a phrase and hold; the phrase will become highlighted in green. Then drag and drop, up or down into the required order. Click okay to commit the changes, the phrases will then display in the selected order on the final SDS.





Useful Tips and Tricks

It's not possible to export an SDS from GHS Pro to a Word document. But it is possible to edit a PDF in Word 2013 and above. Simply right click the PDF, select open with, and select Word. Visit the link below for a video tutorial from Microsoft.

https://support.office.com/en-gb/article/Edit-PDF-content-in-Word-b2d1d729-6b79-499a-bcdb-233379c2f63a