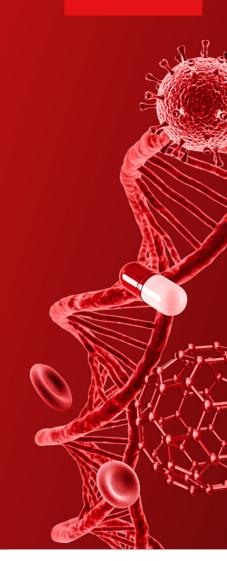


Welcome

The presentation will start shortly.



Introducing



Shalini Saini Ram

Compliance Program Manager, ThermoFisher Scientific

- 15+ years of experience in the biotech industry
- Performed several thousand chemical hazard evaluations, provided critical and safety information to emergency responders, and advised on the safe disposal of waste to internal and external customers
- DOT/IATA certified to determine Dangerous Goods per transport and has stayed current with all state and international regulations
- Currently ensuring that ThermoFisher Scientific instruments and consumables are compliant with REACH and RoHS
- · Society of Chemical Hazard Communications (SCHC) member
- IEEE member
- B.S. in Chemistry with emphasis on Biochemistry from the University of San Francisco (USF).
- Contact: Shalini.Ram@ieee.org



GHS Safety Data Sheets (SDSs) &

Labels

Shalini Saini Ram

Compliance Program Manager February 09, 2022



The world leader in serving science



Agenda

- Globally Harmonized System (GHS)
- 2 Safety Data Sheets (SDSs)
- 3 SDS Examples
- 4 GHS Labels
- 5 GHS Label Examples
- 6 Q&A



Introduction

What is Hazard Communication?

 The purpose of Hazard Communication is to ensure that the hazards of all chemicals used and sold are evaluated, and the information concerning their hazards is transmitted to employees and customers. This information is conveyed through comprehensive hazard communication programs, which include container labeling and other forms of warning, Safety Data Sheets (SDS), and employee training.





Introduction

Globally Harmonized System (GHS)

Global concerns emphasize the need to have standard for the **labeling** and **classification of chemicals** that could be used by companies around the world.

Canada (5th ed.) United States (3rd ed.)

Brazil

(4th ed.)

Every **2 years**, a new version of GHS is put out, but countries have adopted the system at varying paces.

(6th and 7th ed.)

China
(4th ed.)

Europe

South Korea (6th ed.)

> Japan (6th ed.)

> > Australia (3rd ed.)

Introduction

Globally Harmonized System (GHS)

- Developed by the United Nations
- Revised and updated every 2 years
 - Currently on GHS 9th ed. (2021)
- Voluntary international system; not legally binding in any country
- Countries issue their own regulations or standards to implement GHS. Two examples are:
 - US → OSHA's Hazard Communication Standard (HCS) 2012 in the United States;
 - EU → The EU CLP REGULATION (EC) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures;
 - ECHA Guidance on labelling and packaging in accordance with Regulation (EC) No 1272/2008



Introduction

PURPOSE



- Enhances protection of human health & environment through a harmonized system of hazard communication including:
 - · classification and labelling
 - occupational safety
 - safety data sheets
 - · consumer protection
 - transport classification
- Reduces the need for testing and evaluation of chemicals
- Facilitates international trade of chemicals whose hazards have been properly assessed

CONCERN

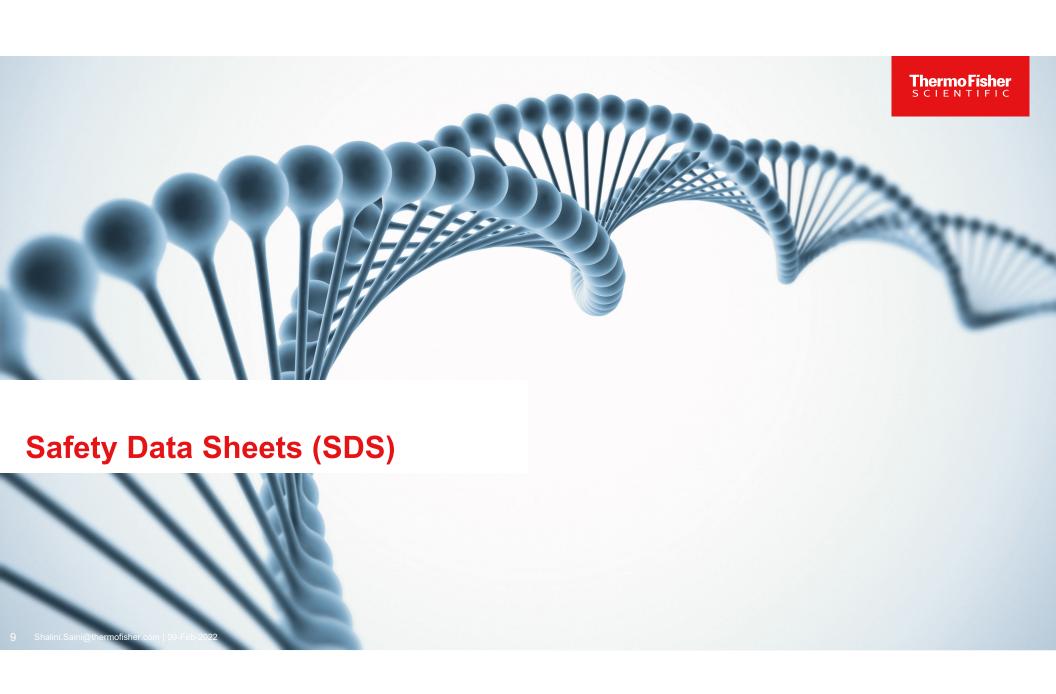


- GHS is not necessarily harmonized, and some countries have adopted GHS in all 4 sectors while others have only adopted GHS in 1 or 2 sectors.
 - Transport
 - Workplace
 - Consumer
 - Pesticides

IMPACT



- Increase quality and consistency of information to workers, employees and chemicals users
- Meet legal obligations
- Safer customer working environment
- Risk reduction
- Prevents shipment holds





What is a Safety Data Sheet (SDS)?

A comprehensive document on hazards associated with the product and information on handling, storage, first-aid, and accidental release measures for safe usage

	SAF	ETY DATA SHEE	т	7
PRODUCTI		E/ MIXTURE AND TH	HE COMPANY/ UNDERTAKING	_
Thermo Fisher Scientific 1228 Titan Way P.O. See 3803 Sunnyvale, California 940 For Jaboratory use,	88-3603	Emergency Phone: Information Phone: Date Revised:		_
2. HAZARD(S) IDE				_
Signal Word: Danger Hazard Statements: H302 Harmful if swall H314 Causes severe H315 Causes sakn irrit H335 May cause resp	owed. skin burns and eye da ation.	amage.		
H290 May be corrosive				
Skin Inhalation:		on may occur.	ж	
Chromatography Mass Spectrome Dionex Products	try Division Sunnyvale, CA 94086-3603	(408) 737-070	0 www.thermofisher.com	

Hazard Communication Safety Data Sheets



The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format, and include 16 section numbers, the headings, and associated information under the headings as indicated below:

- §1, Identification Includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.
- §2, Hazard(s) identification Includes all hazards regarding the chemical; required label elements.
- §3, Composition/information on ingredients Includes information on chemical ingredients; trade secret claims.
- §4, First-aid measures Includes important symptoms/ effects, acute, delayed; required treatment.
- §5, Fire-fighting measures Lists suitable extinguishing techniques, equipment; chemical hazards from fire. Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.
- §7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.
- §8, Exposure controls/personal protection lists Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).
- §9, Physical and chemical properties lists the chemical's characteristics.
- §10. Stability and reactivity lists chemical stability and possibility of hazardous reactions.
- §11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.
- §12, Ecological information
- §13, Disposal considerations
- §14, Transport information, includes USDOT, IATA, IMP/IMDG, and/or ADR classifications.
- §15, Regulatory information includes region-specific (US, EU, APAC) laws and regulations.
- §16, Other information includes the date of preparation or last revision.

Most prevalent sections for our practices are identified in blue

Safety Data Sheet | §1, Identification

AMERICAS



Safety Data Sheet

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

Identification of the substance or mixture

Product code

EGC 500 KOH Cartridge Product name

Company/undertaking identification

Thermo Fisher Scientific

1228 Titan Way P.O. Box 3603 Sunnyvale, CA 94088-3603

THERMO FISHER SCIENTIFIC BRASIL INSTRUMENTOS DE PROCESSO LTDA INSTRUMENTOS DE PROCESSO TIDA R SANTA CLARA, 191 - LOTE 04 QUADRA A2 PARQUE INDUSTRIAL SAN JOSE CEP 06.715-867

24 hour Emergency Response for Hazardous Materials Within the USA + Canada: 1-800-424-9300 and

[or Dangerous Goods] Incident. Spill, Leak, Fire, Exposure, or Accident. Call CHEMTREC 1-703-527-3887

Outside the USA + Canada: 1-703-741-5970

Country Specific Emergency Number (if available):

For research use only

ThermoFisher SCIENTIFIC

EMEA

Thermo Fisher SCIENTIFIC

Safety Data Sheet

Safety Data Sheet according to Regulation (EC) No. 1907/2006 (REACH)
Classification according to Regulation (EC) No. 1272/2008 [CLP]

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

Product identifier Product code

EGC 500 KOH Cartridge

Chemical Name Not Applicable

No registration number is given yet for this substance / substances in this mixture since the annual import quantity is less than one tonnage per annum or the

transition period for its registration according to Article 23 of REACH has not yet

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

Relevant identified uses I aboratory use Use Description Code Not available Uses advised against Not for consumer use

Details of the supplier of the safety data sheet

Manufacturer / Supplier

Thermo Fisher Scientific

P.O. Box 3603 Sunnyvale, CA 94088-3603

Thermo Fisher Scientific (Bremen) GmbH

Hanna-Kunath-Str. 11 28199 Bremen

Germany Phone: +49 (0)421-5493-219

Email: cmd.sds@thermofisher.com

Thermo Fisher Scientific

Tudor Road Cheshire, WA7 1AT, United Kingdom

Phone: +44-1928-534000 Fax: +44-1928-588106

24 hour Emergency Response for Hazardous Materials Within the USA + Canada: 1-800-424-9300 and [or Dangerous Goods] Incident. Spill, Leak, Fire, Exposure. or Accident. Call CHEMTREC 1-703-527-3887 Outside the USA + Canada: 1-703-741-5970

Country Specific Emergency Number (if available):



Safety Data Sheet | §2, Hazard(s) identification

AMERICAS EMEA Classification according to Regulation (EC) No. 1272/2008 [CLP] Signal Word **GHS Classificatio** Physical hazards Corrosive to Metals Hazard pictograms Revision date Product code 23-Oct-2020 075778 Page 1/9 Product name EGC 500 KOH Cartridge Labelling according to Regulation (EC) No 1272/2008 [CLP] www.thermofisher.com Pictogram(s Signal Word H290 - May be corrosive to metals H314 - Causes severe skin burns and eye damage H302 - Harmful if swallowed **Precautionary Statements** P234 - Keep only in original container P260 - Do not breathe dust/fume/gas/mist/vapours/spray P264 - Wash hands thoroughly after handling P280 - Wear protective gloves/protective clothing/eye protection/face protection P270 - Do not eat, drink or smoke when using this product P303 + P361 + P353 - IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with Hazard Statements H290 - May be corrosive to metals H Phrase(s) P390 - Absorb spillage to prevent material damage P301 + P310 - IF SWALLOWED: Immediately call a POISON CENTER or doctor/physician H302 - Harmful if swallowed H314 - Causes severe skin burns and eye damage Page 2 / 10 Product name EGC 500 KOH Cartridge Precautionary Statements Prevention P234 - Keep only in original container P260 - Do not breathe dust/fume/gas/mist/vapors/spray P264 - Wash hands thoroughly after handling P270 - Do not eat, drink or smoke when using this product P Phrase(s www.thermofisher.com P280 - Wear protective gloves/protective clothing/eye protection/face protection P301 + P310 - IF SWALLOWED: Immediately call a POISON CENTER or doctor/physician P303 + P361 + P353 - IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with P305 + P351 + P338 - IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing P304 + P340 - IF INHALED: Remove person to fresh air and keep comfortable for breathing P301 + P330 + P331 - IF SWALLOWED: Rinse mouth. Do NOT induce voniting P360 - Absorb spillage to prevent material damage P365 - P365 + P365 + P365 + P365 - IF IN EYES. Rinse cautiously with water for several minutes. Remove contact lenses, if US SDS for PN 0/5/7/8

Safety Data Sheet | §3, Composition/information on ingredients



AMERICAS

EMEA

SECTION 3: Composition/information on ingredients

Chemical Name	CAS No.	Common name	EINEC S-No	Weight-%
Water	7732-18-5	Not applicable	231-791-2	77.6
Potassium hydroxide	1310-58-3	Not applicable	-	22.4

We recommend handling all chemicals with caution.

Chemical Name	CAS No	EINECS-No.	Weight-%	REACH registration number	Classification according to Regulation (EC) No. 1272/2008 [CLP]
Water	7732-18-5	231-791-2	77.6	-	Not classified
Potassium hydroxide	1310-58-3	-	22.4	-	Met. Corr. 1 - H290
					Acute Tox. 4 - H302
		1			Skin Corr. 1A - H314

SECTION 3: Composition/information on ingredients

All SDS list Hazardous Chemicals in Section 3.

- EXCEPT Korean SDS
 - Korea OSHA requires 100% composition disclosure via the SDS or directly to KR Ministry of Employment and Labor ("MoEL") as Jan. 2021

US SDS for PN 075778 EU SDS for PN 075778



Safety Data Sheet | §14, Transportation information

International Air Transport Association (IATA)



SECTION 14: Transport information

IATA / ADR / DOT-US / IMDG

Classified as dangerous in the meaning of transport regulations

UN number

Potassium hydroxide solution UN proper shipping name

Transport hazard class(es) Ш Packing group

IATA DG classification

US, EU, APAC region SDS will all have the same DG classification

Environmental hazards

Not Hazardous

Special precautions for user

Not Applicable

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

Not Applicable.

INT.R. Intelligations Art 1strasport Associations (Title Intelligations of Dangerous Goods by Road DOT-US. Department of Transportation – United States MDG: Intelligational Maritime Dangerous Goods (United Mations)



Safety Data Sheet | §15 Regulatory Information

California Proposition 65

US SDS

Safety Data Sheet

| Marked Same Same of the confidence and the Same proposed in the Confidence of the

Section 15

California Proposition 65

This product contains the following Proposition 65 chemicals:.

Chemical Name Nickel (II) sulfate hexahydrate (1:1:6) CAS No. 10101-97-0 Weight-% <0.0001 <u>Category</u> Carcinogen Developmental Male Reproductive



WARNING: This product can expose you to chemicals including Nickel (II) sulfate hexahydrate (1:1:6), that is known to the State of California to cause cancer and birth defects or other reproductive harm. For more information go to www.P65Warnings.ca.gov.

CA Proposition 65

US TSCA: United States Toxic Substances Control Act (TSCA)

SDS





Section 15

Component	US TSCA
Nickel (II) sulfate hexahydrate (1:1:6) 10101-97-0 (<0.0001)	-

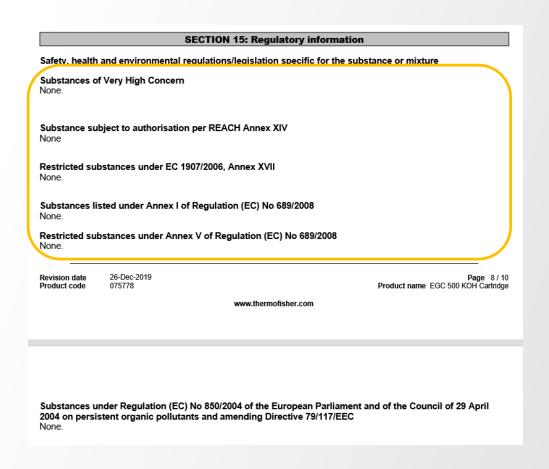
US TSCA



Safety Data Sheet | §15 Regulatory Information

EU SDS

- §15 in general will contain regional/country requirements
- Example of EU SDS (§15):
 - EU REACH SVHCs
 - EU REACH Annex XIV
 (Authorization Substances)
 - EU REACH Annex XVII (Restricted substances)
 - Persistent Organic Pollutants (POPs)



EU REACH: EU Registration, Evaluations, Authorization and Restriction of Chemicals EU REACH SVHCs: <u>EU Substance of Very High Concern</u> <u>EU REACH Annex XIV (Authorization Substances)</u> <u>EU REACH Annex XIVI (Restricted Substances)</u> <u>EU SDS for PN 075778</u>

COVID-19



- Moderna (mRNA vaccine)
 - Fact Sheet
- Pfizer (mRNA vaccine)
 - Safety Data Sheet (SDS)
- Johnson & Johnson (viral vector vaccine)
 - Fact Sheet
- AstraZeneca
 - Safety Data Sheet (SDS)



From left: The Pfizer-BioNTech vaccine, the Moderna vaccine and the Johnson & Johnson vaccine: Gary Cosby Jr/Tuscaoosa News, Jason Beam/USA Today, Johnson & Johnson/AP)

DISCLAIMER: I am not a doctor, and not providing medical advice.

Picture Reference

Example | Non-Hazardous SDS

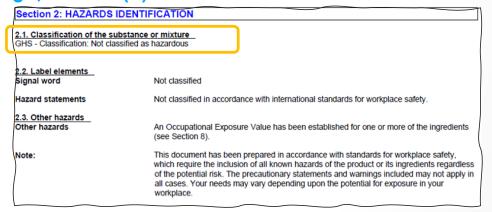
Thermo Fisher SCIENTIFIC

Pfizer COVID-19 Vaccine

• §1, Identification



§2, Hazard(s) identification



§3, Composition/information on ingredients

3.1 Substances Substances		Not applicable					
3.2 Mixtures							
Hazardous							
Chemical name	Weight-%	REACH Registration Number	EC No	Classification according to Regulation (EC) No. 1272/2008 [CLP]	Specific concentration limit (SCL)	M-Factor	M-Factor (long-term
POTASSIUM CHLORIDE 7447-40-7	< 1		231-211-8	Acute Tox 5 (H303)	Not Listed	No data available	No data available
IonHazardous							
Chemical name	Weight-%	REACH Registration Number	EC No	Classification according to Regulation (EC) No. 1272/2008 [CLP]	Specific concentration limit (SCL)	M-Factor	M-Factor (long-term
Water 7732-18-5	•		231-791-2	No data available	Not Listed	No data available	No data available
Sucrose 57-50-1	< 10		200-334-9	No data available	Not Listed	No data available	No data available
SODIUM CHLORIDE 7647-14-5	< 10		231-598-3	No data available	Not Listed	No data available	No data available
ALC-0315 2036272-55-4	< 2		Not Listed	No data available	Not Listed	No data available	No data available
otassium phosphate 7778-77-0	< 1		231-913-4	No data available	Not Listed	No data available	No data available
PF-07305885	<1		Not Listed	No data available	Not Listed	No data available	No data available
PF-07302048	< 1		Not Listed	No data available	Not Listed	No data available	No data available
Disodium phosphate dihydrate 10028-24-7	< 1		Not Listed	No data available	Not Listed	No data available	No data available
Cholesterol 57-88-5	< 1		200-353-2	No data available	Not Listed	No data available	No data available
ALC-0159 1849616-42-7	< 1		Not Listed	No data available	Not Listed	No data available	No data available
1,2-Distearoyl-sn-glyc ero-3-phosphocholine 816-94-4	<1		212-440-2	No data available	Not Listed	No data available	No data available

Section 3 shows ingredients listed here non-hazardous or below the threshold.



Gary Cosby Jr/Tuscaoosa News

Link

Con't Example | Non-hazardous SDS



Pfizer COVID-19 Vaccine

• §14, Transport information,

Section 14: TRANSPORT INFORMATION

The following refers to all modes of transportation unless specified below.

Not regulated for transport under USDOT, EUADR, IATA, or IMDG regulations.



Gary Cosby Jr/Tuscaoosa News

• §15, Regulatory information,

Vater CERCLA/SARA Section 313 de minimus %	Not Listed
California Proposition 65	Not Listed
TSCA	Present
EINECS	231-791-2
AICS	Present
ucrose	
CERCLA/SARA Section 313 de minimus %	Not Listed
California Proposition 65	Not Listed
TSCA	Present
EINECS	200-334-9
AICS	Present
ODIUM CHLORIDE	
CERCLA/SARA Section 313 de minimus %	Not Listed
California Proposition 65	Not Listed
TSCA	Present
EINECS	231-598-3
AICS	Present
LC-0315 CERCL A/SARA Section 313 de minimus %	Not Listed
California Proposition 65	Not Listed
EINECS	Not Listed Not Listed
otassium phosphate	NOT FISIER
CERCL A/SARA Section 313 de minimus %	Not Listed
California Proposition 65	Not Listed
TSCA	Present
EINECS	231-913-4

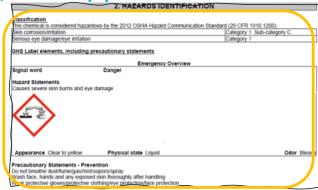
Example | Hazardous SDS

Clorox® Disinfecting Bleach

§1, Identification



§2, Hazard(s) identification



Link US SDS for Clorox® Disinfecting Bleach



§3, Composition/information on ingredients

3. COMPOSITION/INFORMATION ON INGREDIENTS							
Chemical Name	CAS-No	Weight-%	Trade Secret				
Sodium hypochlorite	7681-52-9	4-9	*				
			*				





Con't - Example | Hazardous SDS

Clorox® Disinfecting Bleach

• §14, Transport information,

14. TRANSPORT INFORMATION				
DOT UN-No. Proper Shipping Name Hazard Class Packing Group Marine Pollutant Description	UN1791 Hypochlorite Solutions 8 III This product contains a chemical which is listed as a marine pollutant according to DOT Limited Quantity (LTD QTY)			
TDG UN Number Proper Shipping Name Hazard Class Packing Group Marine Pollutant	UN1791 Hypochlorite Solutions 8 III This product contains a chemical which is listed as a marine pollutant according to TDG.			
ICAO UN-No. Proper Shipping Name Hazard Class Packing Group	UN1791 Hypochlorite Solutions 8 III			
IATA UN Number Proper Shipping Name Hazard Class Packing Group	UN1791 Hypochlorite Solutions 8 III			
IMDG				



• §15, Regulatory information,

International Inventories

All components are listed either on the DSL or NDSL

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List

US Federal Regulations

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product does not contain any chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

SARA 311/312 Hazard Categories

Acute Health Hazard	Yes
Chronic Health Hazard	No
Fire Hazard	No
Sudden release of pressure hazard	No
Reactive Hazard	No

CWA (Clean Water Act)
This product does not contain any substances regulated as pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40

Chemical Name	CWA - Reportable Quantities	CWA - Toxic Pollutants	CWA - Priority Pollutants	CWA - Hazardous Substances
Sodium hypochlorite 7681-52-9	100 lb			Х

This material, as supplied, contains one or more substances regulated as a hazardous substance under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302)

Chemical Name	Hazardous Substances RQs	Extremely Hazardous Substances	RQ
		RQs	
Sodium hypochlorite	100 lb	-	RQ 100 lb final RQRQ 45.4 kg final
7004 50 0			RO

US State Regulations

California Proposition 65

This product does not contain any Proposition 65 chemicals

U.S. State Right-to-Know Regulations

١	Chemical Name	New Jersey	Massachusetts	Pennsylvania	Rhode Island	Illinois
١	Sodium hypochlorite	X	X	X	X	
	7681-52-9					
	Sodium Hydroxide	X	X	X	X	
١	1310-73-2					
1	EPA Pesticide Registration No. 5813-120	•				

EPA Statement



Safety Data Sheets (SDSs) | 2 Types

Manufactured substance/mixture

Substances that are mixed to formulate a product.

- i.e., SDS is Thermo Fisher branded.
 - Manufacturer (i.e., Thermo Fisher) must provide the SDS in all regional formats and languages upon request.



Distributor substance/mixture

Purchased chemicals to be re-sold to a customer as is.

- i.e., Supplier branded.
 - Thermo Fisher purchases chemical(s) from a supplier (i.e., Sigma-Aldrich).
 Thermo Fisher is the distributor of this chemical.
 - The supplier (i.e., Sigma-Aldrich) must provide the SDS in all regional formats and languages upon request.



Safety Data Sheet | Requirements



Manufacturer:

• If a SDS needs to be authored, technical information about the product will need to be provided. This

includes:

- □ Product name (as it appears on the label) and part number
- Manufacturing address
- □ Full Chemical composition
- □ SDSs for each chemical identified in the chemical composition
- Any known hazardous properties
- □ Physical state including color
- □ Any known chemical and physical properties
- □ Any test data if applicable
- □ Volume (mL or gram)
- □ Intended Use (e.g., Research Use Only, In-vitro Diagnostic)

Product Name Part Number Chemical Compostion Profusion Profusion

Distributor:

When SDS and translations are required as distributor, contact the supplier

Requirements

Chemical products must be labeled (product and package) and have a SDS that meets the content and language requirements of where the product is shipped.



Region	Language
APAC	British English
	Hindi
	Indonesian (Bahasa)
	Chinese traditional (Taiwanese)
	Thai
Korea	British English
	Korean
China	British English
	Chinese
EMEA	Arabic
	British English
	Bulgarian
	Czech
	Denmark
	German
	Greek
	Spanish
	Estonian
	Finnish
	French
	Italian
	Lithuanian
	Dutch Netherlands
	Norwegian
	Polish
	Portuguese
	Russian
	Slovakian
	Slovenian
	Swedish
	Turkish
	Hungarian
Japan	British English
	Japanese
AMERICAS	Brazilian Portuguese
	Canadian French
	American English
	Spanish

Requirements

Example

SDS and Labels must match











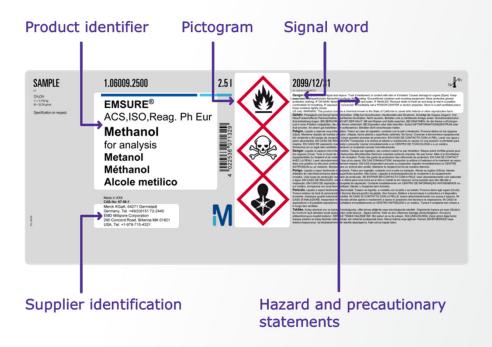




What is a Globally Harmonized System (GHS) label?

Product Labels

Product information (including hazards and precautionary measures) which is printed on the immediate container, or to the outside packaging of the product



Example | GHS Label







US OSHA Hazard Communication Standard (HCS)

GHS labelling criteria given by **OSHA Hazard Communication Standard (HCS)**

- HCS Label Elements:
 - · Name, address, and phone number of the supplier
 - · Nominal quantity of the substance or mixture
 - · Product identifiers
 - · Hazard pictograms
 - · Signal word
 - · Hazard statements
 - · Precautionary statements
 - Supplemental information
- Mandatory employee training requirement
- Can withhold specific chemical identity if it is a trade secret and its hazards are disclosed
 - · May need to disclose in cases of medical emergency

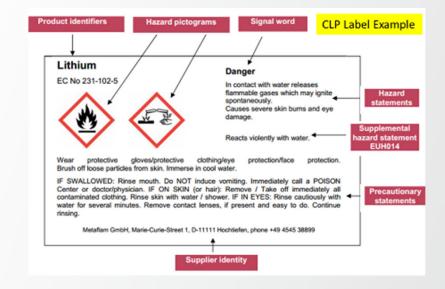




EU Classification, Labelling, and Packaging of **Substances and Mixtures (CLP)**

GHS labelling criteria given by CLP Regulation (EC) 1272/2008

- Written in the official language of destination Member States
- **CLP Label Elements:**
 - Name, address, and phone number of the supplier
 - Nominal quantity of the substance or mixture
 - Product identifiers
 - Hazard pictograms
 - Signal word
 - Hazard statements
 - Precautionary statements
 - Supplemental information
- Not more than six precautionary statements (unless it is necessary)
- Hiding composition info: a request for the use of an alternative chemical name must be submitted to and approved by ECHA
- For small packages (≤125mL), certain GHS label elements can be omitted



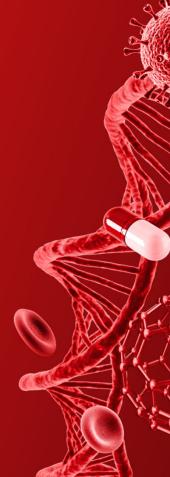
Literature: CLP Regulation Q/A

Summary

- Ensure SDS and labels match
- Understand applicable GHS criteria for destination country
- Ensure GHS SDS are created with translations prior to product launch
- Place GHS compliant labels on all chemicals
- Ensure accurate classification of chemicals
- Establish a system of safe-handling and transportation of chemicals

Q & A Feedback/Comments

Thank you





Appendix | Links and/or Key Definitions

Description	Links or Definitions
OSHA's Hazard Communications Standard (HCS) 2021 in the US	https://www.chemsafetypro.com/Topics/USA/GHS_in_USA_SDS_label.html
EU CLP Regulation (EC) No 1272/2008 on Classification, Labeling and Packaging of Substances and Mixtures	https://www.chemsafetypro.com/Topics/EU/CLP Regulation EC No 1272 2008.html
ECHA Guidance on labeling and packaging in accordance with Regulation (EC) No 1272/2008	https://echa.europa.eu/documents/10162/2324906/clp_labelling_en.pdf/89628d94-573a-4024-86cc-0b4052a74d65
US SDS for PN 075778	https://www.thermofisher.com/document-connect/document-connect.html?url=https://assets.thermofisher.com/TFS-Assets%2FLSG%2FSDS%2F075778 MTR-NALT EN.pdf
EU SDS for PN 075778	https://www.thermofisher.com/document-connect/document-connect.html?url=https://assets.thermofisher.com/TFS-Assets%2FLSG%2FSDS%2F075778 MTR- EULT BE.pdf
IATA	International Air Transport Association
ADR	European Agreement concerning the International Carriage of Dangerous Goods by Road
DOT-US	Department of Transportation – United States
IMDG	International Maritime Dangerous Goods (United Nations)
CA Proposition 65	https://oehha.ca.gov/proposition-65/about-proposition-65
US TSCA: United States Toxic Substances Control Act (TSCA)	https://www.epa.gov/chemicals-under-tsca
EU REACH	EU Registration, Evaluations, Authorization and Restriction of Chemicals
EU REACH SVHCs: EU Substance of Very High Concern	https://echa.europa.eu/candidate-list-table
EU REACH Annex XIV (Authorization Substances)	https://echa.europa.eu/authorisation-list
EU REACH Annex XVII (Restricted Substances)	https://echa.europa.eu/substances-restricted-under-reach
Moderna Fact Sheet	https://www.modernatx.com/covid19vaccine-eua/
Pfizer US Safety Data Sheet	https://safetydatasheets.pfizer.com/DirectDocumentDownloader/Document?prd=PF00092~~PDF~~MTR~~PFEM~~EN
Johnson & Johnson Fact Sheet	https://www.fda.gov/media/146305/download
AstraZeneca AU Safety Data Sheet	https://www.astrazeneca.com.au/content/dam/az-au/AZD1222 SDS 25943 v1-1 16SEP20.pdf
Clorox® Disinfecting Bleach US Safety Data Sheet	https://www.thecloroxcompany.com/wp-content/uploads/2020/03/Clorox-Disinfecting-Bleach_EN2.pdf
CLP Regulation Q/A	https://echa.europa.eu/support/qas-support/browse/-/qa/70Qx/view/scope/clp/annex+vi+to+clp
GHS 9 th ed. (2021)	https://unece.org/sites/default/files/2021-09/GHS_Rev9E_0.pdf
GHS 8 th ed. (2019)	https://unece.org/fileadmin/DAM/trans/danger/publi/ghs/ghs_rev08/ST-SG-AC10-30-Rev8e.pdf
GHS 7 th ed. (2017)	https://www.unece.org/fileadmin/DAM/trans/danger/publi/ghs/ghs rev07/English/ST SG AC10 30 Rev7e.pdf
GHS Label Elements	https://www.unece.org/fileadmin/DAM/trans/danger/publi/ghs/ghs rev07/English/10e annex7.pdf
H-Statements	https://www.sigmaaldrich.com/content/dam/sigma-aldrich/docs/promo_NOT_INDEXED/General_Information/1/h_overview.pdf
P-Statements	https://www.sigmaaldrich.com/content/dam/sigma-aldrich/docs/promo_NOT_INDEXED/General_Information/1/p_overview.pdf