

GHS requirements and inspections in China





Cloris Pan

GHS project manager

Research Center - CIRS Group





- Framework of hazardous chemicalslegislation in China
- How to author SDS/label according to China standards
- Inspection status of SDS/label
- Case sharing

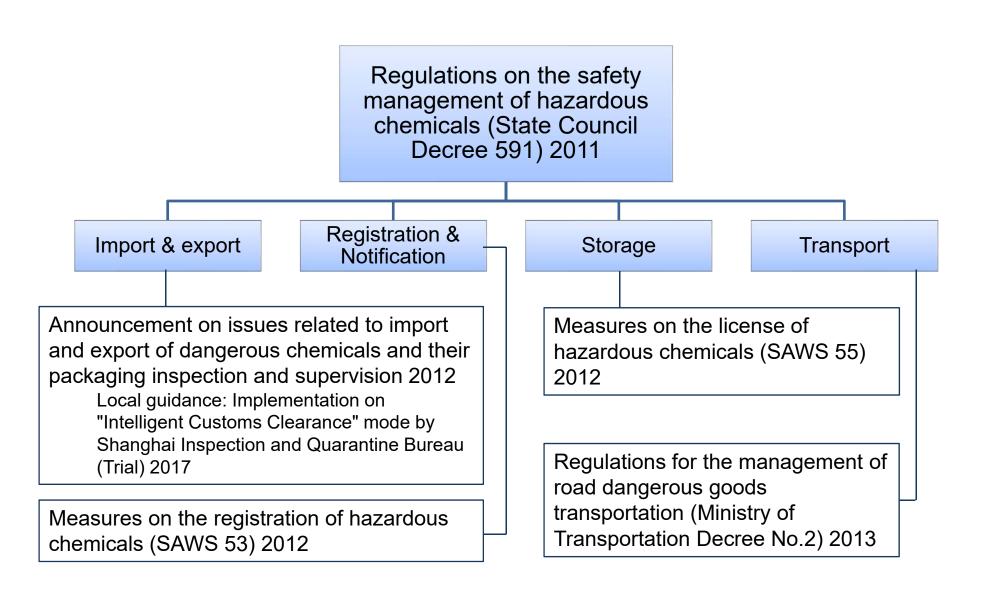




- Framework of hazardous chemicalslegislation in China
- How to author SDS/label according to China standards
- Inspection status of SDS/label
- > Case sharing

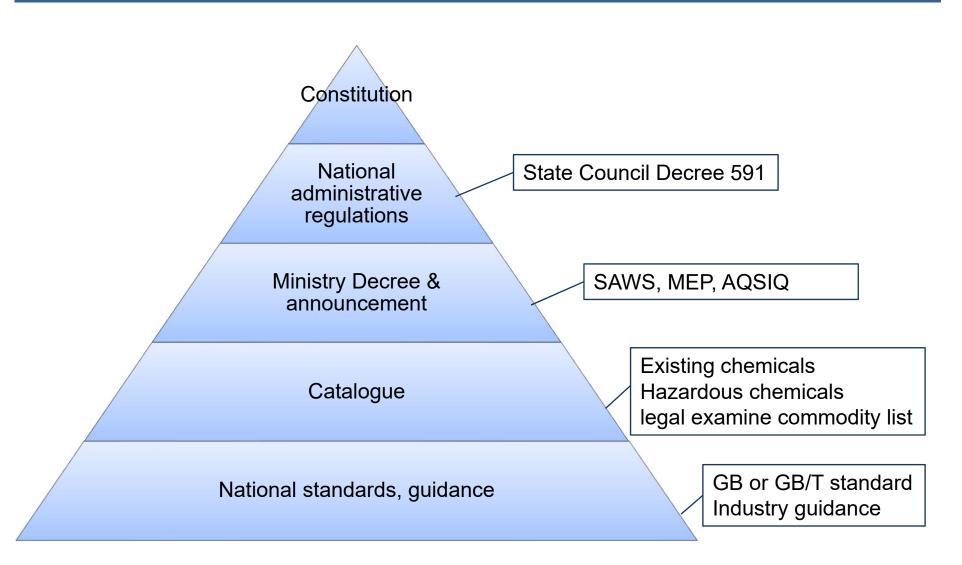
When will SDS/label be requested





Framework of legislations in China









- Framework of hazardous chemicalslegislation in China
- How to author SDS/label according to China standards
- Inspection status of SDS/label
- > Case sharing

The basic SDS/label requirements in China



The national standard

Mandatory

GB 30000.2-29-2013: Rules for classification and labelling of chemicals

GB 15258-2009: General rules for preparation of precautionary label for chemicals

Advisory

GB/T 16483-2008: SDS for Chemical Products - Content and Order of Sections

GB/T 17519-2013: Guidance on the compilation of safety data sheet for chemical products

GB/T 32374-2015: Phrase and codification of chemical hazard statements

The SDS format and mandatory requirements CIRS

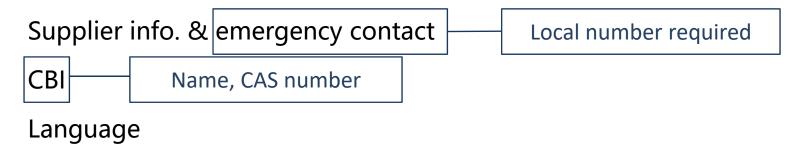
Classification:

The hazardous chemicals list (2015 ver. 2828 items)

Compulsory requirements for classification

Supplier can add more classification and/or upgrade the hazards which marked with <*> in the guidance of implementation of hazardous chemicals list

Contents:



The available database



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,

	第	第	第	第	第	第	第	第	第	第	第	第	第	第	第	第
SDS 编写数据源	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
SDS data resource	寤	部	部	部	部	部	部	部	部	部	部	部	部	部	部	部
	分	分	分	分	分	分	分	分	分	分	分	分	分	分	分	分
Accelrys: (美国) 化学物质毒性效应登记数据库		1						√			1					
Accelrys:Registry of Toxic Effects of Chemical Substances(RTECS)											1110					
http://ccinfoweb.ccohs.ca/rtecs/search.html																

The label elements requirements



Basic element of GHS + "Please refer to Safety Data Sheet" statement



The size requirements of GHS label



Container Capacity	Minimum Label Dimensions					
≤ 0.1L	Simplified labels					
> 0.1 - ≤ 3L	> 50 × 75 mm					
> 3 - ≤ 50L	> 75 × 100 mm					
> 50 - ≤ 500L	> 100 × 150 mm					
> 500 - ≤ 1000L	> 150 × 200 mm					
> 1000L	> 200 × 300 mm					





- Framework of hazardous chemicalslegislation in China
- How to author SDS/label according to China standards
- Inspection status of SDS/label
- Case sharing

Enforcement bureau



AQSIQ Entry-Exit
Inspection and Quarantine



中华人民共和国海关总署 GENERAL ADMINISTRATION OF CUSTOMS, P. R. CHINA

General Administration of Customs (after April 2018)

The scope of products inspection



Regulations on the safety management of hazardous chemicals (State Council Decree 591) 2011

Inventory of hazardous chemicals (2015)

Inspection for all import & export hazardous chemicals and the packages

law on import and export commodity inspection and the relevant enforcement regulation

Catalogue of entry and exit commodities for inspection and quarantine

Packaging Inspection of Dangerous Goods for Export

Inspections for hazardous chemicals



Announcement on issues related to import and export of dangerous chemicals and their packaging inspection and supervision 2012

Safety, hygiene, health, environmental protection, fraud prevention and quality, quantity and weight etc.

The Safety requirements include,

1)The ingredients information, physical and chemical properties and hazard classes

2)GHS label and SDS(Chinese)

For DG packages, the inspections include the type, symbol, class, weight, etc.

The inspection process of exported chemicals CIRS

Inspection at the place of origin

- Hazardous chemicals will be 100% on-site inspected and 100% sent to laboratory
- Performance test and use identification of DG packaging

Inspection at the port

 Based on the inspection at the original place, the DG listed in the "key inspection catalogue of export commodity" shall be randomly inspected (2.5% ratio)

The inspection process of imported chemicals CIRS

Inspection at port

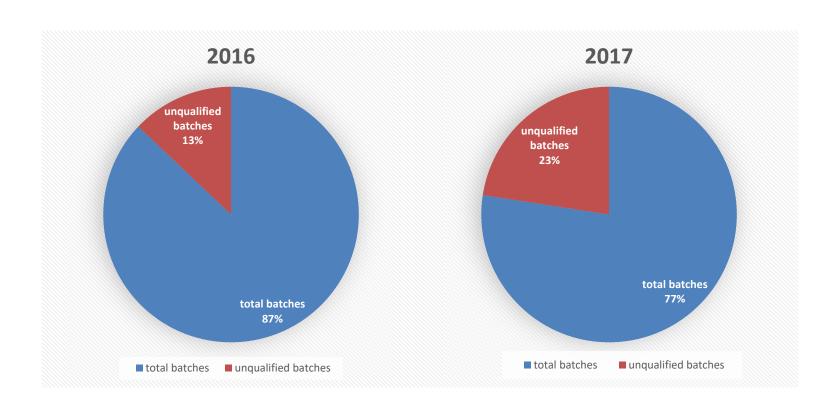
- Performance test for imported DG.
- Hazardous chemicals which are not suitable for sampling at the port, shall be sent to the inspection agency at the destination, after general inspection.

Inspection at the destination

Complete the inspection of hazardous chemicals

Unqualified amount(shanghai)

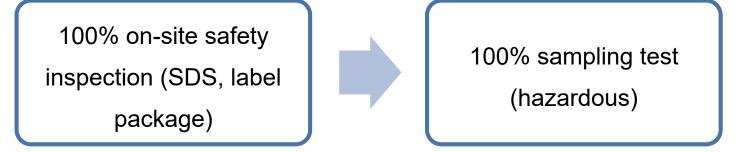




The inspection project at Shanghai Port



2018 work focus – Two "100%" inspections project.

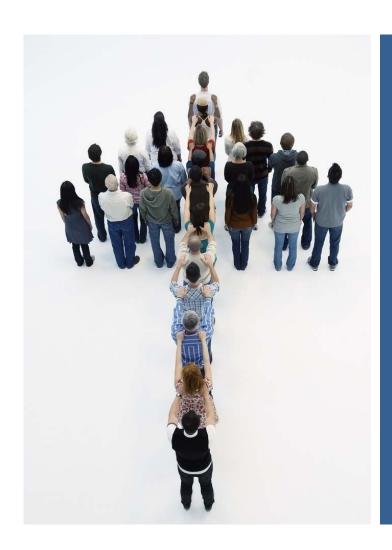


For example, if a hazardous chemical is imported to Suzhou. It will go through the on-site safety inspection at Shanghai Port. After clearance, the Suzhou local bureau will take sample for further test.

Transition period: half a year in Shanghai

http://imi.shciq.gov.cn/xwzs/zxdt/201803/t20180328_80795.html





- Framework of hazardous chemicalslegislation in China
- How to author SDS/label according to China standards
- Inspection status of SDS/label
- Case sharing

Common unqualified cases – documents



Product name (CN&EN)

Missing sections (9 or 12 sections)

Data does not support classification

Missing/incorrect transport information

Incorrect language & poor translation

Label does match the SDS

Unqualified cases – UN packaging



TDG transported as normal goods

Undeclared imported hazardous chemicals

Damaged UN packaging

Incorrect UN packaging



Case study – SDS comments



Classification according to GB30000

H225, H315, H319, H335, H336, H411

Comments from CIQ regarding its GHS label

H222 and H229 shall be added because the product is packed in cylinder.

Problem

 The H222 and H229 do not match the actual situation of the product. If modified, the transportation also need to be changed. It will affect a series of similar products.

Solution

 provide the detailed information about the product package, explaining no pressure is applied in the package.

Thank You!



Abbreviation



SAWS: State Administration of Work Safety

NRCC: National registration center of chemicals

MEP: Ministry of Environmental Protection

AQSIQ: Administration of Quality Supervision, inspection and Quarantine

SKLSCC: State Key Laboratory of Safety and Control for Chemicals