

# Product Stewardship - Local Parts: North America

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## North America specifics

### Identifiers

#### Training Materials

>> Refer to the dedicated [training item](#) . **(broken link)**



#### Pre-requisites for GHS classification rules:

- standard composition;
- section 9 (state of matter), Section 11 & 12;
- the type of substance (Mixture\* / Substance / Pure substance).

Priority listing for display of ingredients' names, throughout the SDS.

|            | <i>Generation language (Z8, ES)</i> | <i>Default language ( )</i> |
|------------|-------------------------------------|-----------------------------|
| TSCA       | 1                                   | 2                           |
| DSL        | 3                                   | 4                           |
| TRIV       | 5                                   | 6                           |
| Z_INTERNAL | 7                                   | 8                           |
| SYN        | 9                                   | 10                          |

#### Section 1:

The following identifiers can be displayed, if available at the **product** level:

- **NAM:PROD** ;
- **NAM:ZCHEM** ;
- **NAM:SYN** ;
- **NUM:Z\_FIFRA** (US only);
- **FRM:SUM**.



#### Useful link

>> Refer to [Priority listing](#) business rules for identifiers

>> All available [Variants](#) in SAP EHS

#### Section 3:

No **product** identifiers are displayed in section 3 (no **NAM:ZCHEM**, no **FRM:MOLEC** , no **NAM:SYN** ).

#### Boiler plates

The **boiler plate** is a series of statements that appear on every **NA MSDS**, whatever the product, for the Rhodia legacy **(to modify)** businesses. Some of them appear directly on the template and the others have been included in a dedicated REAL\_GRP.

The **REAL\_GRP** includes statements in the following characteristics with a validity area Z\_NA:

- **Section 4:** Hints for physician
- **Section 5:** Protective equipment for fire-fighting
- **Section 8:**
  - Advice on system design
  - Respiratory protection
  - Eye protection
  - Industrial hygiene
- **Section 13:** Advice on disposal and packaging

## Specific Countries

## United States of America

|                     |  |
|---------------------|--|
| SDS variant: SDS_US | Language: Z8 (US English) + ES (available in Sinequa, not delivered to customer) |
| Label Variants:     | LB_GHS_US, GLM_OSH_01 (non GHS)  |

### Rules - all the North American rules can be run at the same time using a grouping.

- **GHS US:** there are mainly 3 differences in the US GHS rule compared to the other GHS:
  - OSHA has adopted 3 additional hazards that are mandatory to appear if applicable: Combustible dust, Simple Asphyxiant and Pyrophoric gas;
  - OSHA has not published a list of official supplemental hazards (equivalent to the EUH statements in Europe). However it is encouraged to include on the SDS and label in the **section 2.3** any "Other hazards that do not result in classification", or "HNOC" (*Hazards Not Otherwise Classified*). It is possible to customize the rule to populate some of them automatically based on phrases maintained in **section 9, 11 or 12**.
- **GHS US Environment:**
  - as OSHA has not adopted the environmental portion of the GHS, the environment H-statements should not appear as part of the mandatory classification and labeling. However, **Solvay (to modify)** as a group decided to voluntarily show these H-statements on the SDS and label in the **section 2.3** "Other hazards that do not result in classification". They are based on the UN classification. Only the percentage of unknown acute toxicity is displayed (unknown acute ecotoxicity not shown).
  - Automatic notification statement in the beginning of section 2 from template shown on SDS: "Although OSHA has not adopted the environmental portion of the GHS regulations, this document may include information on environmental effects."
- **Hazard Comp US:**
  - The rule reports in **section 3** : OSHA GHS classified ingredients above their regulatory threshold, ingredients listed as carcinogens by **OSHA, IARC, ACGIH, NTP** if above 0.1% and ingredients with OEL and BEI according to **OSHA, ACGIH, NIOSH, Solvay (to modify)** if above 1%.
  - The rule reports in **section 8** : ingredients with OEL according to **OSHA, ACGIH, NIOSH, Solvay (to modify)** if above 1%
- **RegInfo NA:**
  - The rule reports in **section 11** (Carcinogenicity section): ingredients listed as carcinogens, reproductive toxicity, mutagens (class 1), skin or respiratory sensitization (class 1, 1A and 1B) by **OSHA, IARC, ACGIH, NTP** if above 0.1%
  - The rule reports in **section 15**: ingredients listed on the **California Proposition 65** carcinogen and reproductive toxicity lists, regardless of components concentration in product. The rule does not output any concentration together with the ingredient. However it may be added manually by the SDS writer (exact value or range), in this case the unit (% or ppm) must be maintained.
- **Sara comp:** the rule writes back components that are listed on **SARA 313** chemicals and/or **SARA 302 Extremely Hazardous Substances** .
- **SARA classification:** this rule populates the SARA hazard categories based on GHS US classification.
- **Spill reporting:** the rule writes back components that are listed on:
  - the EPA Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA);
  - SARA 302;
  - Section 304 Reportable Quantities;
  - We do only show in the SDS the RQ at the pure substance level, we do not apply any de minimis.
- **Clean Water Act** (for information only, result not mapped on the SDS);
- **Clean Air Act** (for information only, result not mapped on the SDS). This outputs information in 2 classes: Clean Air Act (US) and VOC;
- **US State RTK** (for information for the Massachusetts and Pennsylvania listings, only the NJ RTK listings may be mapped on the SDS).

## Other Sections

- **Section 1:** There is no email address to be indicated.
- **Section 3:**
  - As it is not mandatory to display classification of ingredients it is not shown in **section 3**. The other zones do show the ingredient classifications in **Section 3**.
  - Although it is not mandatory, it is expected to communicate a composition adding more or less to 100%. The non-hazardous ingredients can be added manually by the SDS writer in the class "Non hazardous ingredients". The "Non hazardous ingredients" class is not affected by the "Display exact value" class. For exact values for non-hazardous ingredients, enter them directly in the "Non hazardous ingredients" class.
  - According to the **OSHA GHS** , if an exact value is not displayed, an automatic sentence appears under the Hazardous ingredients table "*The specific chemical identity and/or exact percentage (concentration) of composition has been withheld as a trade secret.*"
- **Section 5:**
  - Some physical properties important to fire-fighters are duplicated here from the **section 9** (Flash Point, Auto-ignition temperature and explosive properties).
- **Section 8:**
  - Environmental precautions are not displayed;
  - The template also brings, when available, and only if the ingredient is listed in the hazardous ingredients table in **Section 3** : the **NIO SH IDLH** (located in Section 15 > International > Health in the **PURE SUB property tree** );
  - Similarly the template also brings, when available, and only if the ingredient is listed as an OEL ingredient in **Section 8** : the **ACGIH BEI** (located in Section 8 > International > BEI in the **PURE SUB property tree** ).
- **Section 13:**
  - **RCRA Waste codes** may be indicated (manual determination by the SDS writer).
- **Section 14:**
  - *Reportable Quantities, Marine pollutant ingredients, Toxic by Inhalation Hazard, Combustible liquid* may be mentioned if applicable. They are managed by the **DG Administrator** .
- **Section 15:**
  - Other regulatory information may be added manually in the classes "Prohibitions and Restrictions" or "Information About Other Regulations".
  - The class "*TSCA Lists (US)*" is an output of the rule "**Notification status**" . If an ingredient **TSCA 5a** and **TSCA 12b** listed, then it will appear on the SDS.
- **Section 16:**
  - **HMIS** and **NFPA** classifications may be added manually by the SDS writer. If a HMIS classification is maintained, then the phrase "Determined by User; dependent on local conditions" is added automatically under "PPE" on the template. On the label only one of the 2 ratings is mapped in a table, if available: HMIS has priority over NFPA.
  - Under the OSHA GHS, it is mandatory to show the "**Date prepared**" in this section (added automatically by the template, same as issue date).
  - The legend has 2 parts: a dynamic part that collects the acronyms present in section 8 (value types of the OEL values) and a fixed part.

## Canada

|                     |  |
|---------------------|--|
| SDS variant: SDS_CA | Language: 3F (Canadian French) + Z8 (US English)<br><i>Both languages are sent to the customer</i> |
| Label variant:      | WHMIS_01   |

### Rules:

- **GHS\_CA** - this is mostly aligned with **GHS US**, with some exceptions.

|                                 | US   | Canada   |
|---------------------------------|--|--|
| Official Classifications        | Carcinogenic under OSHA  | WHMIS Schedule 4 prescribe PHNOC                                   |
| Hazards Not Otherwise Specified | Not part of mandatory C&L  | Require mandatory C&L (but no list nor criteria)                   |
| Supplemental labeling           |  | For products, which, in contact with water, emit toxic gases       |
| Combustible dust                | Classification required even if may be formed during further processing, No criteria | Classification only required when shipped, Classification criteria |
| Biohazards                      | None   | Part of the mandatory hazards                                      |
| H&P phrases                     | Based on UN rev 3 & 5 (label)  | Based on UN rev 3  |

- Also note: a sensitizer classification 1A or 1B may be derived for a mixture directly from the ingredients, while in other countries, it could only be based on product's data (defaulting to cat 1 otherwise).
- **GHS US Environment** - like in the US, voluntary disclosure of environmental information in section 2.3 and label.
  - Automatic notification statement in the beginning of **section 2** from template shown on SDS: "*Although WHMIS has not adopted the environmental portion of the GHS regulations, this document may include information on environmental effects.*"
- **Hazard Comp US** - it was decided to use the output of the US hazard comp rule for Canada as well (the validity area of this output was changed to "Z\_NA" to fit this need).
  - The template then filters out the regulatory lists relevant for Canada: only **ACGIH**, **IARC** and **Solvay (to modify)** for the carcinogen and OEL listings;
- **CA PBT** (for information only, result not mapped on the SDS).

## Other Sections

- **Section 1:** It is mandatory to indicate in this section:
  - Name and phone number of the group, department or party responsible for the preparation of the material safety data sheet. This is managed inside the address master.
  - Date of preparation of the material safety data sheet. This is added automatically by the template (same as issue date).
- **Section 2:**
  - Since the template is not in the GHS format, the classification is expressed via phrases maintained in the class "*Possible Hazards (Summary)*", "*Signal word*" and "*Remarks*" and then by route of exposure. Warning: a program controls the punctuation of this section. To have phrases displayed as a list (go to the next line and start with a dash for the next phrase), this has to be maintained as 1 value per instance.
- **Section 3:** Same comments as US.
- **Section 5:** Some physical properties important to fire-fighters are duplicated here from the **section 9** (Flash Point, Auto-ignition temperature and explosive properties).
- **Section 8:**
  - Environmental precautions are not displayed.
  - The template also brings, when available, and only if the ingredient is listed as an OEL ingredient in Section 8: the **ACGIH BEI** (located in **Section 8** > International > BEI in the PURE SUB property tree).
- **Section 14:**
  - *Reportable Quantities, Marine pollutant ingredients, Toxic by Inhalation Hazard, Combustible liquid* may be mentioned if applicable. They are managed by the **DG Administrator**.
- **Section 15:**
  - Other regulatory information may be added manually in the classes "Prohibitions and Restrictions" or "Information About Other Regulations".
- **Section 16:**
  - **HMIS** and **NFPA** classifications may be added manually by the SDS writer, same priorities as for US.
  - The legend has 2 parts: a dynamic part that collects the acronyms present in section 8 (value types of the OEL values) and a fixed part.

More questions? Contact [EH&S support team](#) .