

MS comments Template

QF003	Document: DCRS 81: 202x - Hazardous Substances or Products Containing Hazardous Substances - Classification and Labelling
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1	2	(3)	4	5	(6)	(7)	(8)
MB 1	Clause No./ Subclause No./ Annex / Figure / Table	Line Number	Type of com- ment ²	Comment (justification for change) by the MB	Proposed change by the MB	Consultants Comments	RTC observations on each comment submitted
TT	Foreword	15	te	Should “maintenance of Standards” be changed to “maintenance of the GHS” as this implies the Sub-Committee is responsible for this standard?	Change maintenance of Standards” to “maintenance of the GHS”.	Accepted	Accepted.
TT	Foreword, Paragraph 3 and Section 4		ed	GHS is spelt out incorrectly as it indicates that GHS is the Globally Harmonized Hazard Classification and Labelling Systems.	GHS is the Globally Harmonized System of Classification and Labelling of Chemicals.		Accepted.
TT	Foreword, Paragraph 4		te	Foreword, Paragraph 4 states that the GHS Sub-committee is responsible for maintenance of the GHS Standards. However, GHS is not a standard.	Per #6 of the Foreword of the GHS, it should read, “The GHS Sub-Committee is responsible for maintaining the GHS, promoting its implementation and providing additional guidance as needs arise.”	Accepted	Accepted.
TT	2 Normative References		ed	Note that the normative references in both DCRS 80 and DCRS 81 have different formats and referencing for the same documents e.g. for the UN GHS Rev 10/2023). This can be streamlined especially as both standards are to function in tandem.	Suggest streamlining referencing format in this section.		Editorial committee to review.

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TT			ge	The current scope of regional standard states it applies to "hazardous chemicals, substances, mixtures and products that contain chemicals." However, the term "products" is not clearly defined, which can lead to confusion.	Therefore, we would recommend to stating that the standard applies "to pure substances and their dilute solutions and to mixtures, while Articles are out of the scope", as outlined in section 1.3.2.1.1 of the GHS. Additionally, we suggest revising the language to reflect that GHS applies to all chemicals, not just hazardous ones. All chemicals must be classified for all GHS class hazards, but only those which have been classified as hazardous for any hazard class must be labelled.	It might be useful to use the statement as contained in clause 1.3.2.1.1 of GHS. The GHS is the reference for the standard. All the details of the reference document does not have to be included in the standard. Committee?	TT withdrew the comment. Comment withdrawn.
TT	Scope	20	te	The GHS also exempts products that may contain a hazardous substance or mixture, but not in a form where exposure can occur, referred to as 'articles'. Are these to be considered out of scope as well, or have they been captured already?	Include as an exemption 'products that may contain a hazardous substance or mixture, but not in a form where exposure can occur, referred to as 'articles	Not all articles are in a form that will not lead to exposure. Some articles may cause exposure if it breaks or degrades. Committee?	Withdrawn.
TT	Scope	21	te	Should cosmetics also be included, noting the reference in the GHS?	Include 'cosmetics' as one of the aspects to which the Standard does not apply.	Hazardous substances are sometimes used in cosmetics albeit in contravention of regulations where they exist. This could be an avenue through which people are exposed to hazardous substances.	MB's comment was accepted. Cosmetics is to be placed in the list of exemptions under paragraph 2.

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TT	Scope	Paragrap h 2 – Line 4	ge	Regarding human and veterinary pharmaceuticals, GHS applies to all stages of life cycle (as workplace) but not when these chemicals are for consumer use, that is, for human intentional intake or ingestion or intentional application to animals.	We suggest clarifying this in a footnote		Consultant to review and provide feedback. Points to be addressed: <ol style="list-style-type: none"> 1. Separate wording for hazardous chemicals at point of manufacture /transport versus point of consumption 2. Inclusion of wording to address CRS 39 3. Inclusion of cosmetics as an exemption under paragraph 2.

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TT			te	The definition of "chemical" used in this standard is stated in the CARICOM REGIONAL STANDARD Terminology and definitions for hazardous substances and products containing hazardous substances and refers to a "substance" but lacks alignment with the broader GHS context, where "chemical" encompasses substances and mixtures, as stated before.	Our recommendation to modify the definition would ensure consistency between both Standards (DCRS 80:202x and DCRS 81:202x), and to align with existing GHS terminology. For example, the GHS labelling tables cited in the standard (such as Tables 27, 33 and 34) refer to chemicals as substances and mixtures in their titles and hazard statements, and not only to substances. (See Clause 1 versus Subclauses 9.4.3.4 and Table 6, or Subclause 11.1 versus Subclauses 11.3 and 11.4). Therefore, "substances and mixtures" should be used consistently throughout.	Accept	DCRS 81 to be updated to align with changes made in DCRS 80. Editorial committee to review and align.
TT	6 Classification of Hazards 6.1 General ii	2	te	Given that the definition of manufacturer from the Pesticides Labelling Standard is to be included, does this definition include 'processor' making the use of the terms here redundant?	Delete the term 'processor' if it is captured in the definition of 'manufacturer'.	Accept	Accepted.

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TT	See Subclause 6.1.1		ge	The note suggesting that the national competent authority validates classification and labelling could imply an undue burden on these authorities to take responsibility for classifications. This contradicts the fundamental nature of the GHS, which is designed to serve as a self-classification tool for chemicals. Such a shift in responsibility could undermine the intended purpose of empowering manufacturers to accurately classify and label their products.	The section outlining the responsibilities of manufacturers and stakeholders needs additional clarification and should be more aligned with standard practices, rather than reflecting regulatory language.		Consultant explanation accepted. Comment withdrawn.
TT	6 Classification of Hazards 6.1 General ii	2	te	Should exporter be included in this list noting that it was included in the Scope?	Include the term 'exporter'.	Even though a substance may be exported from another country, it is the importer in the market of consumption that has the responsibility.	Explanation accepted. Comment withdrawn.

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TT	6.2 Classification of mixtures ii	4	te	Should a definition of bridging principles be included in this Standard or a specific section reference to the GHS? Noting it is not in (applicable to) the Terminology Standard.	Include a definition for ' bridging principles'.	Since the bridging principles are different as explained in the different chapters of GHS, definition in the standard is not necessary or may even be quite difficult.	Explanation accepted. Comment withdrawn.
TT	6.2 Classification of mixtures ii	4	ed	Should this be health "and" environmental hazards?	Include the word "and" between "health environmental hazards".		Editorial committee to review.
TT	6.2.1 Use of cut-off values/concentration limits	1	te	Are the other types of calculations in the GHS to determine hazards also being considered i.e. summation method and proportional calculation?	Consider the inclusion of the other types of calculations in the GHS to determine hazards i.e. summation method and proportional calculation?	Not sure what this question is asking or what is being suggested since there are no specific types of calculations used in the standard.	Comment withdrawn.
GY	7		te	Include a few examples of labels in formats outlined so the manufacturer/supplier can get a few actual examples of the labels for guidance.		No actual suggested change. However, this type of info might not be suitable for the standard but could be provided in other literature.	MB's comment was not accepted. Consultant's explanation accepted.

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TT	7.1.1 Label Elements		ge	The regional standard currently lacks a clear explanation of what classification entails, in terms of the assignment of GHS labelling elements. We recommend including a paragraph that clearly expresses that this assignment is strictly linked to GHS hazard classification results, and standardized for each hazard class and category, facilitating a comprehensive understanding for all stakeholders involved.	The suggestion is to include paragraph 7.1.1 as follows: "The GHS hazard communication system is based in harmonized classification criteria and GHS labelling elements are strictly assigned depending on the hazard classification results for each chemical, which are hazard classes and correspondent categories. Hazard symbols, signal words and hazard statements have been standardized and assigned to each of the hazard categories within each hazard class. These standardized elements should not be subject to variation and should appear on the GHS label as stated in 1.4.6.2 of the GHS, and as indicated in Tables 2 to 34 of this Standard."	Committee?	MB's comment was partially accepted. Place proposed text under subclause 7.1 General: The GHS hazard communication system is based in harmonized classification criteria and GHS labelling elements are strictly assigned depending on the hazard classification results for each chemical, which are hazard classes and correspondent categories. Hazard symbols, signal words and hazard statements have been standardized and assigned to each of the hazard categories within each hazard class.
TT	7.2.1 Hazard Symbols Figure 1		ed	The bottom edge of the last row of symbols seems to be cut off.	Suggest that this be formatted (add space above figure title) so the symbols are displayed in their entirety.		Editorial committee to review.

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BB	7.2.2.3 Figure 3		te	It is understood that the figures are sourced from the UN GHS Rev 10 etc. However, it can be said that the exclamation mark pictogram may be difficult to read unless apt previous detailed awareness of the labels is available. In comparison to the others, from a layman's standpoint the exclamation mark could use more detail to communicate that it is a skin irritant. Essentially, the other pictograms are more self-explanatory than that of the exclamation mark.	The suggestion would be to add a small detail to communicate that the substance with the exclamation mark attached is a skin irritant. Something maybe similar to corrosion but would not obscure the two. Again it is understood that these are international stipulations, but if there is room for change, this is a small suggestion.	If we adjust the pictogram, it would no longer be a GHS pictogram. Our pictogram would no longer be part of the globally harmonized system. Perhaps representation could be made to the UN subcommittee.	MB's comment was not accepted.
BB	7.4.1		ge	It can be said that the signal words are very close in definition and prone to be confusing to some. While both words are well explained and justified, it is observed that there is room for misinterpretation by the reader due to the words possibly acting as synonyms and not scales of hazard.	It is hoped that in some, if not most instances it is emphasized that the signal words are accompanied by the appropriate pictograms and hazard statements, that would assist in communicating the right levels of hazards to the reader as mentioned in 7.6.	If we adjust the wording, it would no longer be a GHS label. Our wording would no longer be part of the globally harmonized system. Perhaps representation could be made to the UN subcommittee.	MB's comment was not accepted.
TT	7.4.5 Supplier identification		ge	No electronic/ digital contact information is requested.	Consider including the supplier's email or website information on the label. Perhaps social media information can be optional.		Accepted. Extend list under 7.4.5 to include email address.

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TT	7.5.1c		te	The text reads, "...the exclamation mark shall appear..."	Confirm whether the text should read, "...the exclamation mark shall not appear..."	The text should readshall not appear....	Accepted. 7.5.1c to be updated to say 'shall not appear'.
TT	7.5.3.1		te	The text reads, "...Very toxic to marine life..."	Confirm whether the text should read, "...Very toxic to aquatic life..."	The full statement should be: "if the statement H410 – "Very toxic to aquatic life with long lasting effects" is assigned, the statement "Very toxic to aquatic life may be omitted" The code H4140 also needs to be corrected to H410.	Consultant's recommendations accepted. 7.5.3.1 to be updated.
BB	7.11.2.1	10	ed	There seems to be an error in the spelling of the word 'bulk' in subparagraph (e) of paragraph 7.11.2.1. The word bilk is used instead of bulk.	7.11.2.1 e) conveyer systems of free-standing bulk storage of solids		Editorial committee to review.
TT	Subclauses 9.1, 9.2 and 9.3		ge	The inclusion of various labelling requirements can create confusion regarding the assignment of appropriate GHS elements.	We propose that the standard clearly delineate the GHS assignment criteria and eliminate any ambiguous language to provide a consistent framework for labelling assignments.		Comment withdrawn.

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BB	9.2		ge	For this section, it is seen that most things are addressed, but it can be said (if not already mentioned and missed) that there should be an accompanying section for information on disposal for employers, workers and consumers.	This can be with regards to reclamation or recycling also, however, this not only spans the product but moreso the container the product is stored in. For instance, the triple rinse theory for farmers is communicated and similar methods for as many applicable substances should be made available with these other provisions for the target audience.	That is information that is to be included in the SDS	MB's comment was not accepted. The requested information is captured in the SDS' requirements of the GHS
GY	10.1 (d)		ed	The word sensitisation is spelt with a "z". It should be in an "s" in keeping with British spelling, if same is being used in the drafting of regional standards.	Use British spelling consistently throughout the document.		Editorial committee to review.
GY	9.2.3		te	The label should address chemical mixing and storage	j) Chemical mixing k) Storage	Storage and handling is part of the consideration for inclusion in the SDS.	MB's comment partially accepted. Proposed change: 9.2.3 a) the use, and directions for usage of the product

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BB	11.4.1 Table 33		ge	<p>Reference to the Annexes of the Montreal Protocol ensures that all controlled Ozone Depleting Substances (ODS) are covered.</p> <p>Please note however that eighteen Hydrofluorocarbons (HFCs) are also listed in an Annex of the Montreal Protocol, specifically Annex F, and HFCs are not categorised as ODS. HFCs are powerful greenhouse gases that contribute to climate change and much like ODS pose similar hazards and risks to health and therefore should not be omitted. Therefore, you may wish to give consideration to:</p> <ol style="list-style-type: none"> 1. changing the title of the Table 33 – Criteria for classifying Category 1 Substances or Mixtures hazardous to the ozone layer and climate, or if the intention is to only specify ODS then list the specific annexes that relate to ODS only, which are Annexes A, B C and E. 	Table 33 – Criteria for classifying Category 1 Substances or Mixtures hazardous to the ozone layer and climate		<p>MB's comment was not accepted.</p> <p>Consultant's explanation was accepted.</p> <p><u>Definitions used in DCRS 80 capture HFCs appropriately. The labels for the tables are taken from the GHS. The GHS does not create a separation between ODS and HFCs.</u></p>
BB	11.4.2 Table 34		ge	Reference to the Annexes of the Montreal Protocol ensures that all	Table 34 – Label elements for Category 1 substances and mixtures hazardous to the ozone layer and climate		MB's comment was not accepted.

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				<p>controlled Ozone Depleting Substances (ODS) are covered.</p> <p>Please note however that eighteen Hydrofluorocarbons (HFCs) are also listed in an Annex of the Montreal Protocol, specifically Annex F, and HFCs are not categorised as ODS. HFCs are powerful greenhouse gases that contribute to climate change and much like ODS pose similar hazards and risks to health and therefore should not be omitted. Therefore, you may wish to give consideration to:</p> <ol style="list-style-type: none"> 1. changing the title of the Table 33 – Criteria for classifying Category 1 Substances or Mixtures hazardous to the ozone layer and climate, or if the intention is to only specify ODS then list the specific annexes that relate to ODS only, which are Annexes A, B C and E. 			<p>Consultant's explanation was accepted.</p> <p><u>Definitions used in DCRS 80 capture HFCs appropriately. The labels for the tables are taken from the GHS. The GHS does not create a separation between ODS and HFCs.</u></p>
BB	A.3.2	Line 3	ed	<p>Attention is drawn to the use of the acronym ATE to represent the phrase acute toxicity values versus the use of the letters ATV. The acronym ATE is used for Acute Toxicity Estimates so for clarity should the acronym be</p>	Acute toxicity values (ATV)		<p>MB's comment was partially accepted.</p> <p>Clarification provided.</p>

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				ATV or ATE or should the term be acute toxicity values or acute toxicity estimates.			Include in section 4 Abbreviations: ATE – Acute toxicity estimates / Acute toxicity values.
TT			ge	Under the Introduction, it states that the standard does not cover all areas of the UN GHS 10. A partial adoption may lead to inconsistencies and confusion	Recommend a complete adoption of the GHS framework, advocating for a simpler, more direct language that refers to the adoption of GHS at a certain version (6th, 7th, or 10th) and refers to the corresponding UN Document. Sections could be included on relevant sectors (workplace, pesticides, consumer products, transport) and outlining obligations related to classification, labelling, safety data sheets (SDS), and enforcement.		MB withdrew the comment.

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