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**UN/CEFACT Forum  
International Trade and Business Processes Permanent Group  
(TBG Group)**

Comments by the UNECE secretariat on document TRADE/CEFACT/2005/23\*

**UN/CEFACT Business Standard  
Material Safety Data Sheet Business Requirement Specification**  
Version: 1.0  
Revision: R.05A

This document has been submitted by the secretariat **for discussion.**

\* The UNECE Trade Development and Timber Division has submitted the present document after the official documentation deadline due to resource constraints.

1. The UNECE secretariat notes that a draft UN/CEFACT Business Standard “Material Safety Data Sheet Business Requirement Specification” has been proposed in document TRADE/CEFACT/2005/23.
2. MSDS are indeed important hazard communication elements in chemical safety procedures, and the international harmonization of the information required in such MSDS is desirable for international trade facilitation. Until recently, there were several internationally recognized standards that provided guidance for the preparation of safety data sheets, e.g. the ILO Standard under Recommendation 177 on Safety in the Use of Chemicals at Work, ISO Standard 11 014, ANSI Standard 400.1 and European Commission directive 91/155/EEC.
3. The United Nations Conference on Environment and Development (Rio de Janeiro, 1992), adopted the following recommendation for hazardous chemicals:

*“A globally harmonized hazard classification and compatible labelling system, including national safety data sheets and easily understandable symbols, should be available, if possible, by the year 2000.”*
4. Following cooperation between the International Labour Office (ILO), the Organization for Economic Cooperation and Development (OECD) and the United Nations Economic and Social Council’s Sub-Committee of Experts on the Transport of Dangerous Goods, a Globally Harmonized System of Classification and Labelling of Chemicals (GHS) was adopted in 2002 by a newly established United Nations “Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (GHS Sub-Committee), and published by the United Nations in 2003 (ST/SG/AC.10/30; available as sales publication No. 03.II.E.25 in the six effective languages of the United Nations and on the UNECE website ([www.unec.org/trans/danger/publi/ghs/ghs\\_rev00/00files\\_e.html](http://www.unec.org/trans/danger/publi/ghs/ghs_rev00/00files_e.html))).
5. The UN Economic and Social Council invited all governments to take the necessary steps, through appropriate national procedures and/or legislation, to implement the GHS as soon as possible and no later than 2008. It also invited the regional commissions, United Nations programmes, the specialized agencies and other organizations concerned to promote the implementation of the GHS and, where relevant, to amend their respective legal international instruments addressing transport safety, work safety, consumer protection or protection of the environment so as to give effect to the GHS through such instruments (Council’s resolution 2003/64 of 25 July 2003, section B, operative paragraphs 3 and 5).
6. The UNECE secretariat notes that the business requirement specification in TRADE/CEFACT/2005/23 is based on the requirements and procedures in force in one country for chemicals which are imported to that country, which are not necessarily the same as those in force in other countries, and therefore these specifications, as drafted, would be of interest only to one country. The UNECE secretariat suggests that the proposed specifications should be revised to take account of the GHS so that they may be used for international trade at a worldwide level.

7. The GHS provisions concerning MSDS are reproduced in document TRADE/CEFACT/2005/32 containing provisions concerning Material Safety Data Sheets (MSDS) in the “Globally Harmonized System of Classification and Labelling of Chemicals” (GHS in document ST/SG/AC.10/30 as amended by ST/SG/AC.10/32/Add.3), and the UNECE secretariat strongly recommends that the MSDS information in the proposed Business Requirements Specification be fully harmonized with the GHS specifications and guidance.
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