

**ACC ANSI Work Group Responses to Participant Questions at the October 15, 2008 Open Meeting\*  
October 29, 2008**

**1. Since the GHS Purple Book is revised every 2 years, which edition of the Purple Book is the basis for this ANSI standard?**

The most current published version: in this case, revision 2. Since we are not including the GHS classification, the next version of the Purple Book should have little impact on our standard.

**2. Are NGOs and labor reps participating in the canvass process?**

Yes, a variety of NGOs and trade organizations will be invited to participate in the canvass process.

**3. Are "industrial chemicals" defined? Are there other standards for "non industrial" chemicals?**

A definition of "chemical" is included in the glossaries of the individual standards. The definition will be carried over into the combined standard. "Industrial chemical" is not defined in the previous standards. We are not aware of other ANSI standards that specifically cover "non-industrial chemicals".

**4. What is the relationship to ISO standards?**

It is our understanding that the ISO SDS standard is being revised to be consistent with the GHS. The ANSI MSDS Standard is currently, and this combined Standard will be consistent with the GHS and the ISO SDS standard as well.

**5. How are the GHS Purple Book annexes being treated in this new ANSI standard?**

The Purple Book annexes are highly technical in nature. With a few exceptions, the annexes are beyond the scope of our combined standard. We are using the information from relevant annexes, such as Annex 4 on the preparation of safety data sheets, in our deliberations.

**6. Will the new standard require a "NA" entry for those areas of the MSDS like GHS will?**

The combined standard will recommend that the terms "Not Available" or "Not Applicable" be used instead of "NA" as appropriate.

**7. Will you be recommending pictogram size on labels like they do in the European GHS?**

No. The combined standard is not adopting the GHS requirements for pictograms on labels at this time until there is movement by the regulatory authorities, particularly OSHA. However, there is nothing that would prohibit the inclusion of the pictograms if you choose to use them.

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**8. Your timeline is very ambitious. Getting the SDS and label samples to match up may be more of a task than anticipated. Comment?**

Our work group has been working on this version of the Standard for almost a year. Our timeline is not fixed. It could lengthen if there are significant developments by regulatory authorities on GHS, etc.

**9. Are these ANSI standards recognized in regulations in any other countries or regions?**

The ANSI MSDS standard is recognized as a guidance document in other world areas.

**10. Can we have a subgroup be building a consensus schema for the structured electronic exchange of the data concurrently with this standard, so that when the standard is finalized the ability to incorporate it into e-commerce in a structured manner would be ready to go?**

Electronic exchange of data was addressed in a previous edition of another ANSI standard. We do not know if the standard is current or being maintained. The ANSI organization may have more information. Electronic data exchange and format is beyond the scope of this combined standard, which focuses on the hazard assessment and document preparation processes.

**11. Susan mentioned that professionals could be part of the canvass process. Is Susan the person who should be contacted to be part of the process?**

Yes. Contact Susan Blanco at [susan\\_blanco@americanchemistry.com](mailto:susan_blanco@americanchemistry.com).

**12. What is expected to be incorporated regarding static accumulators?**

A sub-team within our work group is working to address specific physical hazards. They are evaluating the issues and deciding whether specific criteria and recommended wording should be included.

**13. Will the category of flammable aerosol be included as a physical hazard in the new combined standard?**

See response to question 12.

**14. Regarding combustible dust, will some guidance be included regarding what testing endpoints are recommended to be included, as a minimum? (MIE, Kst, MOC, etc.)?**

See response to question 12.

**15. Why will the Annexes to the Standard not be part of the Canvass? Will there be any opportunity for the Canvass group to see the draft Annexes before they are finalized?**

Annexes are defined as supplemental information by ANSI. They provide additional information for the user of an ANSI standard. When we distribute the draft document to the canvass, the draft

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Annexes will be included as well. However, when the canvass votes, they are voting on the content of the standard and not the annexes.

**16. Why were the tested phrases removed from the 2004 Z400? Will they be in this new standard?**

When the introductory text was reviewed at that time, it was found to be ambiguous and confusing. While some phrases from previous versions of the standard were identified as “tested”, the Standard did not endorse or recommend their use. It was decided that the phrases added did not add significant value. We were also attempting to reduce pages and therefore the cost of the document. There is currently no intention to reintroduce them into the combined standard.

**17. While you won't require the GHS symbols will there be text permitting their use if the author so desires to use them?**

See response to question 7.

**18. Are you verifying that your formatting proposal for SDS will not conflict with the format required by REACH? Other countries? What are you doing to help facilitate a globally acceptable format?**

The SDS format required under REACH is consistent with the GHS. This combined standard’s recommendations for safety data sheet format are also consistent with the GHS. There is nothing in the combined standard that would prohibit the inclusion of data for other world areas in an ANSI-consistent document.

**19. Do you intend to incorporate any guidance around the "eSDS" (extended SDS) required for certain substances under REACH?**

No, we do not. This is an American National Standard intended to assist preparers to comply with US requirements. REACH is an EU-specific regulation.

**20. Why not adopt the UN GHS/SDS format?**

See response to question 18.

**21. Will there be normative definitions in the body of the standard as well as Informative terms in the Glossary annex? Normative terms are "required" -- but the annexes are not. Since the glossary can change as an editorial without canvass vote this could make a difference.**

Yes. The revised standard, like its predecessors, will continue to provide definitions in the body of the standard to help guide SDS and label preparers in communicating the hazards of industrial chemicals. The glossary will remain informative.

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