GMB
London Region
Health and Safety
Department

Guidance on Safety Data Sheets

This News Service is intended to help safety representatives' demand information from their employer, and gives guidance on how to understand the information in data sheets once they are received. Getting material on dangerous substances should be easy as the law requires all suppliers to provide specific information on hazards. However, in practice the law is often abused and very rarely enforced.

This guidance is intended to help safety representatives demand information from their employer, and gives guidance on how to understand the information in data sheets once they are received. The Chemicals (Hazard Information and Packaging for Supplying) Regulations, (CHIP) state that suppliers of dangerous substances and preparations must provide recipients with safety data sheets. These regulations are based on European law and must contain the following headings:

1. Identification of the substances/preparation and company;
2. Composition/information on ingredients;
3. Hazards identification;
4. First aid measures;
5. Fire fighting measures;
6. Accidental release measures;
7. Handling and storage;
8. Exposure control/personal protection;
9. Physical and chemical properties;
10. Stability and reactivity;
11. Toxicological information;
12. Ecological information;
13. Disposal considerations;
14. Transport information;
15. Regulatory information;
16. Other information;

The data sheet should be supplied with all substances classified as dangerous including the 2,500 on the Health and Safety Commission's approved supply list. However, detailed sheets are required for any substances likely to be harmful even if they do not appear on that list.

The regulations cover not only chemicals, but any substance including animal and vegetable matter. There are some exceptions if the substances is bought in a shop and intended for the general public, but general safety information needs to be provided even in these cases. Safety data sheets must be in English, even where a substance is supplied from abroad. Safety reps can agree locally for them also be available in another language if there are a number of workers who do not have English as a first language.

One problem that safety reps often encounter is that although safety data sheet supplied by other EU countries should cover the same 16 points as the British data sheets, sheets supplied from outside the EU often do not comply with EU law. Many chemicals are imported from countries like the USA where the information required in material safety data sheets is very different. However, if a substance is imported into the UK the supplier has a responsibility to provide a data sheet which complies with the EU laws.

WHAT USE ARE SAFETY DATA SHEETS?

Under the Control of Substances Hazardous to Health Regulations (COSHH) employers must carry out a risk assessment in all circumstances where dangerous substances are, or are likely to be used. Safety data sheets can be invaluable in helping employers carry out a COSHH assessment. They are not a substitute for an assessment, and safety data sheets only describe the hazards. Employers must assess the risks and take measures to remove and control them. Employers can not rely solely on information given in safety data sheets. They vary considerably in quality, and while they can be a useful source of information, many are either inaccurate or incomprehensible. Further information on the hazards should be sought, and there are a wide range of independent sources of information available both commercially and free on the internet (see below).

GETTING HOLD OF SAFETY DATA SHEETS.

Safety representatives should be able to get copies of safety data sheets for any substances that are used in their workplace. Often however, the employer cannot provide them because they were not kept, or were not sent by the supplier. If this happens, safety representatives can insist that their employer get copies of the safety data sheets from the supplier.

There is no obligation under CHIP for employers to automatically provide safety data sheets directly to employees. However, the Health and Safety at Work Act requires employers to give all necessary information to their employees where it is necessary to ensure their health and safety at work. The Health and Safety Commission has published an approved code of practice on data sheets which states that "safety data sheets should be regarded as open documents and they, or the information they contain, should be available to employees or their appointed safety representatives."

UNDERSTANDING SAFETY DATA SHEETS.

Under CHIP, the supplier must ensure that the information given is "sufficient". That means it must give enough information to allow the user to decide how to protect people at work. It must also provide the information given under the headings listed previously. The Approved Code of Practice (ACoP) on safety data sheets gives more detailed guidance on what should be covered under the sixteen headings but many safety data sheets do not adhere to the regulations. Very few produced outside the UK are likely to follow the ACoP, even if they do use the sixteen obligatory headings.

The following paragraphs expand on some of the headings and explain what should be contained, and how to understand the technical information that may be given.

Identification of the substances/preparation and company.

These would have the name of the substance or trade name. A trade name, such as "Safety Cleaner" is the brand name the manufacturer gives the product. It does not tell you what chemicals are in the product or whether the product is a mixture of chemicals or a single chemical. The same chemical may be used in a variety of products with different trade names. The name that is given here should be the same as that used on the label. The name and address of the supplier, along with an emergency telephone number should also be given.

Composition/information on ingredients.

This should give the ingredients and composition of the substance or preparation. It is not necessary to always give the full composition and their actual concentrations. However, sufficient information must be given to allow your employer to readily identify the risk associated with the substance or preparation. A generic name for a chemical describes a family or group of chemicals. For example "chlorinated hydrocarbons" is the generic name for many thousands of different chemicals. Sometimes a generic name would be listed but these are not sufficient and the actual chemical names themselves must also be given.

The actual chemical or specific name is the one that actually describes that individual chemical. For instance, methyl chloroform is one of the many thousands of chlorinated hydrocarbons. The chemical name is the easiest name to use when trying to get information on the health effect of chemicals and how to protect yourself, as different chemicals within the same family may react very differently. The safety data sheet should also normally give the CAS and EINECS number. The CAS number is the number assigned by the Chemical Abstract Services to each individual chemical.

In some cases, different chemicals will have the same name. However, they will all have a separate CAS number which can be used to look up information.

Currently 23 million chemicals have been assigned a CAS number. The EINECS is the European Inventory of Existing Commercial Chemical Substances. This is a list of 100,000 substances of which 2,500 are defined as dangerous.

Hazard identification.

This will indicate the most important hazards that the substance or preparation presents. It will give the specific hazard, the likely effect on health, and the symptoms relating to the uses and possible misuses of the substance. Usually it will describe how the substance is likely to be hazardous i.e. through inhalation, touch, swallowing, and is likely to use a number of specific risk phrases and safety phrases that are set out in CHIP. Examples of a risk phrase are "may cause cancer" or "toxic by inhalation". Safety phrases tell the user what to do or, what not to do, such as "do not empty into drains" or "wear suitable gloves".

In some cases, a supplier will only give a number instead of a risk or safety phrase; make sure that if a number is given you ask your employer what this means.

Safety Representatives and Safety Committee Regulations *(SRSC)* 1977 sets out a legal framework of statutory rights which enable safety reps to carry out functions within their workplace and should ensure the following rights are:

- *To **INVESTIGATE** potential hazards and causes of accidents at the workplace;*
- *To **INVESTIGATE** employee complaints concerning health, safety and welfare at work;*
- *To **MAKE REPRESENTATIONS** to the employer on any health, safety and welfare matter in the workplace;*
- *To **INSPECT** the workplace on a quarterly basis, more frequently if negotiated with the employer;*
- *To **INSPECT** the workplace after a reportable accident, dangerous occurrence or reportable disease;*
- *To **VIEW** documents relating to health, safety and welfare within the workplace;*
- *To **REPRESENT** employees in consultation with Health and Safety Executive inspectors and to receive information from them;*
- *To **SET UP** a Safety Committee and then to **ATTEND** meetings of safety committees;*
- ***TIME OFF** for Safety Representative **HEALTH, SAFETY & WELFARE** training; and*
- ***PAID TIME OFF** by the employer to carry out all of the above functions.*