CiRS



Q1: What the definition of small packaging?

There is no definition of small packaging in GB 30000.1, we cannot simply judge whether a container is a small packaging according to the packaging volume. We recommend to refer to the relevant contents in the 8th edition of UN GHS, it gives some examples for the labelling of small packagings.

Q2: Is it possible to include both H314 and H318 on the SDS & Label?

We cannot say it's illegal, but as GB 30000.1 emphasizes that if the statement H314 "causes sever skin burns and eye damage" is assigned, the statement H318 "causes serious eye damage" may be omitted. In order to avoid evident duplication or redundancy in the information conveyed by hazard statements, we recommend to follow the precedence rules.

Q3: When is the anticipated release of the revised GB 15258-2009?

GB 15258–2009 General rules for preparation of precautionary label for chemicals was published in 2009, it has been used for more than 10 years. With the release of GB 30000.1, there are modifications to the provisions concerning labels, thus to initiate the revision of GB 15258 is inevitable. However, the release timeline will not be imminent, as it is currently just at the project initiation stage, and then involves drafting, public comments feedback, revisions, and eventual publication. Futhermore, we can assure that there will be a transitional period for enterprises to have adequate time to prepare.

Q4: Is it feasible to commence preparations for conducting tests on desensitized explosives and updating the SDS at this time?

We can proceed with conducting tests and updating the SDS at this moment. However, concerning the national standard for desensitized explosives, namely GB 30000.30, which has yet to be published and implemented, it is also compliant for us not to engage in these activities at this time. Following the release of this standard in the future, there will be a transitional period provided to enterprises for preparation. Therefore, companies can assess based on their individual circumstances whether to commence the classification of desensitized explosives.

Q5: The cut-off values/concentration limits in the current national standards GB/T 17519-2013 and GB 30000.1-2024 are not consistent, which standard should we adhere to?

Cut-off values/concentration limits are of significant importance as they impact whether products require regulatory compliance for creating SDSs and labels. Given that GB/T 17519 was formulated with reference to the 4th revision of the UN GHS, and GB 30000.1 is based on the 8th revision, in cases of conflict, the most recent revision, GB 30000.1 should be followed.

Q6: Could we compile the SDS in accordance with the 10th revised edition of UN GHS, is it accepted by the Customs?

We can prepare SDS in accordance with the current national standards, but this falls under the minimum requirements and compulsory specifications. Within the GB 30000 series, GB 30000.2 to GB 30000.29 are formulated based on the 4th revision of the UN GHS, while GB 30000.1 is based on the 8th revision. However, Customs may demand that enterprises provide SDS prepared according to the 10th revision of the UN GHS, as they retain the right to impose more stringent requirements.

Q7: Which categories do the cut-off value/concentration limit for respiratory/skin sensitization apply to (category 1, 1A or 1B)?

The cut-off value/concentration limit apply to all hazard categories for respiratory/skin sensitization. The SDS should be provided when a mixture contains hazardous ingredients that meet the criteria for respiratory/skin sensitization in a concentration exceeding 0.1%.