SECTION 1 Identification of the substance / mixture and of the company / undertaking

Product name: COPPER SULFATE, PENTAHYDRATE
Chemical Name: copper sulfate, pentahydrate
Synonyms:
- Blue copperas, CSP, Crop Care Blue Vitriol, Cu-O4-S.5H2O, CuSO4.5H2O, Iron copper sulphate pentahydrate, Salzburg vitriol, blue copperas, blue stone, blue stone vitriol, copper (II) sulphate, copper monosulphate pentahydrate, copper sulphate, copper vitriol pentahydrate, copper(II) sulphate pentahydrate, copper(II) sulphate, copper(II) sulphate pentahydrate, copper(II) sulphate 5-hydrate AnalaR, cupric copper(II) sulphate pentahydrate (1:1:5), cupric sulphate pentahydrate, sulfuric acid copper(2+) salt (1:1), pentahydrate

Proper shipping name: ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. (contains copper sulfate, pentahydrate)
Chemical formula: CuSO4 5(H2O)

CAS number: 7758-99-8

Relevant identified uses of the substance or mixture and uses advised against

Relevant identified uses:
- Used as an agricultural fungicide, bactericide, algicide, herbicide; feed and fertiliser additive; in insecticide mixtures; in the manufacture of other copper salts; as mordant in textile dyeing; in tanning leather. Also used in preserving hides; in preparation of azo dyes; in preserving wood; in electroplating solutions; as battery electrolyte; in laundry and metal-marking inks; in petroleum refining; as floatation agent; in mordant baths for intensifying photographic negatives; in pyrotechnic compositions; in water-resistant adhesives for wood; in metal colouring and tinting baths; as reagent toner in photography and photoengraving.

Details of the supplier of the safety data sheet

Registered company name: VWR International, Pty Ltd
Address: Unit 1/31 Archimedes Place 4172 QLD Australia
Telephone: 61 7 3009 4100 ; 1300 727 696
Fax: 61 7 3009 4199 ; 1300 135 123
Website: http://au.vwr.com
Email: csaus@au.vwr.com

Emergency telephone numbers:
- 61 7 3009 4100 ; 1300 727 696
- 61 7 3009 4100 ; 1300 727 696

SECTION 2 Hazards identification

Classification of the substance or mixture

HAZARDOUS CHEMICAL. DANGEROUS GOODS. According to the Model WHS Regulations and the ADG Code.

ChemWatch Hazard Ratings

<table>
<thead>
<tr>
<th>Flammability</th>
<th>Toxicity</th>
<th>Body Contact</th>
<th>Reactivity</th>
<th>Chronic</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Poisons Schedule: S6

GHS Classification[1]:
- Chronic Aquatic Hazard Category 1, Eye Irrit. 2, Skin Corrosion/irritation Category 2, Acute Toxicity (Oral) Category 4


Label elements

GHS label elements

Signal word: WARNING

Hazard statement(s):
- H302 Harmful if swallowed
- H315 Causes skin irritation
- H319 Causes serious eye irritation
**SECTION 3 Composition / information on ingredients**

**Substances**

<table>
<thead>
<tr>
<th>CAS No</th>
<th>% [weight]</th>
<th>Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>7758-99-8</td>
<td>&gt;=98</td>
<td>copper sulfate, pentahydrate</td>
</tr>
</tbody>
</table>

**Mixtures**

See section above for composition of Substances

**SECTION 4 First aid measures**

**Description of first aid measures**

**Eye Contact:**

- If this product comes into contact with the eyes:
  - Immediately hold eyelids apart and flush the eye continuously with running water.
  - Ensure complete irrigation of the eye by keeping eyelids apart and away from eye and moving the eyelids by occasionally lifting the upper and lower lids.
  - Continue flushing until advised to stop by the Poisons Information Centre or a doctor, or for at least 15 minutes.
  - Transport to hospital or doctor without delay.
  - Removal of contact lenses after an eye injury should only be undertaken by skilled personnel.

**Skin Contact:**

- If skin contact occurs:
  - Immediately remove all contaminated clothing, including footwear.
  - Flush skin and hair with running water (and soap if available).
  - Seek medical attention in event of irritation.

**Inhalation:**

- If fumes or combustion products are inhaled remove from contaminated area.
- Lay patient down. Keep warm and rested.
- Prostheses such as false teeth, which may block airway, should be removed, where possible, prior to initiating first aid procedures.
- Apply artificial respiration if not breathing, preferably with a demand valve resuscitator, bag-valve mask device, or pocket mask as trained. Perform CPR if necessary.
- Transport to hospital or doctor.

**Ingestion:**

- IF SWALLOWED, REFER FOR MEDICAL ATTENTION, WHERE POSSIBLE, WITHOUT DELAY.
- For advice, contact a Poisons Information Centre or a doctor.
- Urgent hospital treatment is likely to be needed.
- In the mean time, qualified first-aid personnel should treat the patient following observation and employing supportive measures as indicated by the patient's condition.
- If the services of a medical officer or medical doctor are readily available, the patient should be placed in his/her care and a copy of the MSDS should be provided. Further action will be the responsibility of the medical specialist.
- If medical attention is not available on the worksite or surroundings send the patient to a hospital together with a copy of the MSDS.

*Where medical attention is not immediately available or where the patient is more than 15 minutes from a hospital or unless instructed otherwise:*

- INDUCE vomiting with fingers down the back of the throat. ONLY IF CONSCIOUS. Lean patient forward or place on left side (head-down position, if possible) to maintain open airway and prevent aspiration.

**NOTE:** Wear a protective glove when inducing vomiting by mechanical means.

**Indication of any immediate medical attention and special treatment needed**

For copper intoxication:

- Unless extensive vomiting has occurred empty the stomach by lavage with water, milk, sodium bicarbonate solution or a 0.1% solution of potassium ferrocyanide (the resulting copper ferrocyanide is insoluble).
- Administer egg white and other demulcents.
- Maintain electrolyte and fluid balances.
- Morphine or meperidine (Demerol) may be necessary for control of pain.
- If symptoms persist or intensify (especially circulatory collapse or cerebral disturbances, try BAL intramuscularly or penicillamine in accordance with the supplier's recommendations.
- Treat shock vigorously with blood transfusions and perhaps vasopressor amines.
- If intravascular haemolysis becomes evident protect the kidneys by maintaining a diuresis with mannitol and perhaps by alkalinising the urine with sodium bicarbonate.
- It is unlikely that methylene blue would be effective against the occasional methaemoglobinemia and it might exacerbate the subsequent haemolytic episode.
- If symptoms persist or intensify (especially circulatory collapse or cerebral disturbances, try BAL intramuscularly or penicillamine in accordance with the supplier's recommendations.
- TREAT FOR SHOCK AND A LIVER FAILURE.
- Administer egg white and other demulcents.
- Maintain electrolyte and fluid balances.
- Morphine or meperidine (Demerol) may be necessary for control of pain.
- If symptoms persist or intensify (especially circulatory collapse or cerebral disturbances, try BAL intramuscularly or penicillamine in accordance with the supplier's recommendations.
- Treat shock vigorously with blood transfusions and perhaps vasopressor amines.
- If intravascular haemolysis becomes evident protect the kidneys by maintaining a diuresis with mannitol and perhaps by alkalinising the urine with sodium bicarbonate.
- It is unlikely that methylene blue would be effective against the occasional methaemoglobinemia and it might exacerbate the subsequent haemolytic episode.
- Institute measures for impending renal and hepatic failure.

*Gosselink, SMITH & HIDGE: Commercial Toxicology of Commercial Products*:

- A role for activated for charcoal is; as yet, unproven.
- In severe poisoning CaNa2EDTA has been proposed.

*Ellenhorn & Barceloux: Medical Toxicology*:

- Ingestion: In severe poisoning CaNa2EDTA has been proposed.
- A role for activated for charcoals or emesis is, as yet, unproven.

**SECTION 5 Firefighting measures**
Extinguishing media
- Water spray or fog.
- Foam.
- Dry chemical powder.
- BCF (where regulations permit).

Special hazards arising from the substrate or mixture

Fire Incompatibility:
None known.

Advice for firefighters

Fire Fighting:
- Alert Fire Brigade and tell them location and nature of hazard.
- Wear breathing apparatus plus protective gloves in the event of a fire.
- Prevent, by any means available, spillage from entering drains or water courses.
- Use fire fighting procedures suitable for surrounding area.

Fire/Explosion Hazard:
- Non combustible.
- Not considered a significant fire risk, however containers may burn.

SECTION 6 Accidental release measures

Personal precautions, protective equipment and emergency procedures

Minor Spills:
- Remove all ignition sources.
- Clean up all spills immediately.
- Avoid contact with skin and eyes.
- Control personal contact with the substance, by using protective equipment.

Major Spills:
Environmental hazard - contain spillage.
Moderate hazard.
- CAUTION:
Personal Protective Equipment advice is contained in Section 8 of the MSDS.

SECTION 7 Handling and storage

Precautions for safe handling

Safe handling
- Avoid all personal contact, including inhalation.
- Wear protective clothing when risk of exposure occurs.
- Use in a well-ventilated area.
- Prevent concentration in hollows and sumps.

Other information
- Store in original containers.
- Keep containers securely sealed.
- Store in a cool, dry area protected from environmental extremes.
- Store away from incompatible materials and foodstuff containers.

Conditions for safe storage, including any incompatibilities

Suitable container:
- DO NOT use aluminium or galvanised containers
- Polyethylene or polypropylene container.
- Check all containers are clearly labelled and free from leaks.

Storage incompatibility:
Derivative of electropositive metal.
Inorganic derivative of Group 11 metal.
- WARNING: Avoid or control reaction with peroxides. All

Package Material Incompatibilities:

SECTION 8 Exposure controls / personal protection

Control parameters
Occupational Exposure Limits (OEL)

INGREDIENT DATA

Emergency Limits

<table>
<thead>
<tr>
<th>Ingredient</th>
<th>TEEL-0</th>
<th>TEEL-1</th>
<th>TEEL-2</th>
<th>TEEL-3</th>
</tr>
</thead>
<tbody>
<tr>
<td>copper sulfate, pentahydrate</td>
<td>0.393(ppm)</td>
<td>1.18(ppm)</td>
<td>150(ppm)</td>
<td>200(ppm)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ingredient</th>
<th>Original IDLH</th>
<th>Revised IDLH</th>
</tr>
</thead>
<tbody>
<tr>
<td>COPPER SULFATE, PENTAHYDRATE</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Exposure controls

Appropriate engineering controls
Engineering controls are used to remove a hazard or place a barrier between the worker and the hazard. Well-designed engineering controls can be highly effective in protecting workers and will typically be independent of worker interactions to provide this high level of protection.

The basic types of engineering controls are:
Process controls which involve changing the way a job activity or process is done to reduce the risk.

Personal protection
Recommended material(s):

**GLOVE SELECTION INDEX**

Glove selection is based on a modified presentation of the: "Forsberg Clothing Performance Index". The effect(s) of the following substance(s) are taken into account in the COPPER SULFATE, PENTAHYDRATE.

<table>
<thead>
<tr>
<th>Material</th>
<th>CPI</th>
</tr>
</thead>
<tbody>
<tr>
<td>A: Best Selection</td>
<td>B: Satisfactory; may degrade after 4 hours continuous immersion</td>
</tr>
<tr>
<td>C: Poor to Dangerous Choice for other than short term immersion</td>
<td></td>
</tr>
</tbody>
</table>

* CPI - Chemwatch Performance Index

**Respiratory protection:**

Where the concentration of gas/particulates in the breathing zone, approaches or exceeds the "Exposure Standard" (or ES), respiratory protection is required. Degree of protection varies with both face-piece and Class of filter; the nature of protection varies with Type of filter.

<table>
<thead>
<tr>
<th>Required Minimum Protection Factor</th>
<th>Half-Face Respirator</th>
<th>Full-Face Respirator</th>
<th>Powered Air Respirator</th>
</tr>
</thead>
<tbody>
<tr>
<td>up to 10 x ES</td>
<td>AUS</td>
<td>-</td>
<td>-PAPR-AUS / Class 1</td>
</tr>
<tr>
<td>up to 50 x ES</td>
<td>-</td>
<td>-AUS / Class 1</td>
<td>-</td>
</tr>
<tr>
<td>up to 100 x ES</td>
<td>-</td>
<td>-2</td>
<td>-PAPR-2 ^</td>
</tr>
</tbody>
</table>

^ - Full-face

A (All classes) = Organic vapours, B AUS or B1 = Acid gases, B2 = Acid gas or hydrogen cyanide(HCN), B3 = Acid gas or hydrogen cyanide(HCN), E = Sulfur dioxide(SO2), G = Agricultural chemicals, K = Ammonia(NH3), Hg = Mercury, NO = Oxides of nitrogen, MB = Methyl bromide, AX = Low boiling point organic compounds(below 65 degC).

**Body protection:**

See Other protection below

**Other protection:**

- Overalls.
- P.V.C. apron.
- Barrier cream.

**Thermal hazards:**

**SECTION 9 Physical and chemical properties**

Information on basic physical and chemical properties

<table>
<thead>
<tr>
<th>Appearance</th>
<th>Relative density (Water = 1)</th>
<th>Partition coefficient n-octanol / water</th>
<th>Auto-ignition temperature (°C)</th>
<th>Decomposition temperature</th>
<th>Viscosity (cSt)</th>
<th>Molecular weight (g/mol)</th>
<th>Taste</th>
<th>Explosive properties</th>
<th>Oxidising properties</th>
<th>Surface Tension (dyn/cm or mN/m)</th>
<th>Gas group</th>
<th>Volatile Component (%vol)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical state</td>
<td>Divided Solid</td>
<td>Relative density (Water = 1)</td>
<td>Partition coefficient n-octanol / water</td>
<td>Auto-ignition temperature (°C)</td>
<td>Decomposition temperature</td>
<td>Viscosity (cSt)</td>
<td>Molecular weight (g/mol)</td>
<td>Taste</td>
<td>Explosive properties</td>
<td>Oxidising properties</td>
<td>Surface Tension (dyn/cm or mN/m)</td>
<td>Gas group</td>
</tr>
<tr>
<td>Odour threshold</td>
<td>Not applicable</td>
<td></td>
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<tr>
<td>Odour</td>
<td>Not applicable</td>
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<tr>
<td>Odour threshold</td>
<td>Not applicable</td>
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<tr>
<td>pH (as supplied)</td>
<td>Not applicable</td>
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<tr>
<td>Melting point / freezing point (°C)</td>
<td>110</td>
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<td>Initial boiling point and boiling range (°C)</td>
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<tr>
<td>Flash point (°C)</td>
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<tr>
<td>Evaporation rate</td>
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<tr>
<td>Flammability</td>
<td>Not applicable</td>
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<tr>
<td>Upper Explosive Limit (%)</td>
<td>Not applicable</td>
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</tr>
<tr>
<td>Lower Explosive Limit (%)</td>
<td>Not applicable</td>
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<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Vapour pressure (kPa)</td>
<td>9.7 hPa</td>
<td></td>
<td></td>
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<td></td>
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<td></td>
<td></td>
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<td></td>
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<tr>
<td>Solubility in water (g/L)</td>
<td>Miscible</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Vapour density (Air = 1)</td>
<td>Not applicable</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

**SECTION 10 Stability and reactivity**

Reactivity:

See section 7

Chemical stability:

- Presence of incompatible materials.
- Product is considered stable.
- Hazardous polymerisation will not occur.

Possibility of hazardous reactions:

See section 7

Conditions to avoid:

See section 7

Incompatible materials:

See section 7

Hazardous decomposition products:

See section 5

**SECTION 11 Toxicological information**
Information on toxicological effects

Inhaled:
The material is not thought to produce respiratory irritation (as classified by EC Directives using animal models). Nevertheless inhalation of dusts, or fumes, especially for prolonged periods, may produce respiratory discomfort and occasionally, distress. Inhalation of dusts, generated by the material during the course of normal handling, may be damaging to the health of the individual.
Levels above 10 ug/m³ of suspended inorganic sulfates in the air may cause an excess risk of asthmatic attacks in susceptible persons.

Ingestion:
Accidental ingestion of the material may be harmful; animal experiments indicate that ingestion of less than 150 gram may be fatal or may produce serious damage to the health of the individual.
Sulfate salts are poorly absorbed from the gastro-intestinal tract but because of osmotic activity are able to draw water from the lumen to produce diarrhoea (purging). Sulfate ion usually has little toxicological potential.
Numerous cases of a single oral exposure to high levels of copper have been reported.

Skin Contact:
Evidence exists, or practical experience predicts, that the material either produces inflammation of the skin in a substantial number of individuals following direct contact, and/or produces significant inflammation when applied to the healthy intact skin of animals, for up to four hours, such inflammation being present twenty-four hours or more after the end of the exposure period. Skin irritation may also be present after prolonged or repeated exposure; this may result in a form of contact dermatitis (nonallergic). The dermatitis is often characterised by skin redness (erythema) and swelling (oedema) which may progress to blistering (vesiculation), scaling and thickening of the epidermis. At the microscopic level there may be intercellular oedema of the spongy layer of the skin (spongiosis) and intracellular oedema of the epidermis.

Eye:
Evidence exists, or practical experience predicts, that the material may cause eye irritation in a substantial number of individuals and/or may produce significant ocular lesions which are present twenty-four hours or more after instillation into the eyes(s) of experimental animals.
Repeated or prolonged eye contact may cause inflammation characterised by temporary redness (similar to windburn) of the conjunctiva (conjunctivitis); temporary impairment of vision and/or other transient eye damage/ulceration may occur.
Copper salts, in contact with the eye, may produce conjunctivitis or even ulceration and turbidity of the cornea.

Chronic:
Limited evidence suggests that repeated or long-term occupational exposure may produce cumulative health effects involving organs or biochemical systems.
Limited evidence shows that inhalation of the material is capable of inducing a sensitisation reaction in a significant number of individuals at a greater frequency than would be expected from the response of a normal population.
Pulmonary sensitisation, resulting in hyperactive airway dysfunction and pulmonary allergy may be accompanied by fatigue, malaise and aching. Significant symptoms of exposure may persist for extended periods, even after exposure ceases.

TOXICITY

<table>
<thead>
<tr>
<th>COPPER SULFATE, PENTAHYDRATE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Acute Toxicity:</strong> Copper sulfate is corrosive and acute toxicity is largely due to this property. There have been reports of human suicide resulting from the ingestion of gram quantities of this material.</td>
</tr>
<tr>
<td><strong>Acute Toxicity:</strong> Oral Category 4</td>
</tr>
<tr>
<td><strong>Carcinogenicity:</strong> Not Applicable</td>
</tr>
<tr>
<td><strong>Reproductivity:</strong> Not Applicable</td>
</tr>
<tr>
<td><strong>Serious Eye Damage/Irritation:</strong> Eye Irrit. 2</td>
</tr>
<tr>
<td><strong>STOT - Single Exposure:</strong> Not Applicable</td>
</tr>
<tr>
<td><strong>Respiratory or Skin sensitisation:</strong> Not Applicable</td>
</tr>
<tr>
<td><strong>STOT - Repeated Exposure:</strong> Not Applicable</td>
</tr>
<tr>
<td><strong>Mutagenicity:</strong> Not Applicable</td>
</tr>
<tr>
<td><strong>Aspiration Hazard:</strong> Not Applicable</td>
</tr>
</tbody>
</table>

CMR STATUS

SECTION 12 Ecological information

Toxicity
Very toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment.
Do NOT allow product to come in contact with surface waters or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash-waters.
Wastes resulting from use of the product must be disposed of on site or at approved waste sites.

Persistence and degradability

<table>
<thead>
<tr>
<th>Ingredient</th>
<th>Persistence: Water/Soil</th>
<th>Persistence: Air</th>
</tr>
</thead>
</table>

Bioaccumulative potential

<table>
<thead>
<tr>
<th>Ingredient</th>
<th>Bioaccumulation</th>
</tr>
</thead>
</table>

Mobility in soil

<table>
<thead>
<tr>
<th>Ingredient</th>
<th>Mobility</th>
</tr>
</thead>
</table>

SECTION 13 Disposal considerations

Waste treatment methods

Product / Packaging disposal:
- Containers may still present a chemical hazard/danger when empty.
- Return to supplier for reuse/ recycling if possible.
Otherwise:
- If container can not be cleaned sufficiently well to ensure that residuals do not remain or if the container cannot be used to store the same product, then puncture containers, to prevent re-use, and bury at an authorised landfill.

SECTION 14 Transport information

Labels Required:
Marine Pollutant

HAZCHEM: 2Z

SECTION 15 Regulatory information

Safety, health and environmental regulations / legislation specific for the substance or mixture

copper sulfate, pentahydrate(7758-99-8) is found on the following regulatory lists

- OECD List of High Production Volume (HPV) Chemicals
- Australia High Volume Industrial Chemical List (HVICL)
- Australia - Therapeutic Goods Administration (TGA) Substances that may be used as active ingredients in Listed medicines
- Australia - Inventory of Chemical Substances (AICS)
- Sigma-AldrichTransport Information
- Acros Transport Information
- Regulations concerning the International Carriage of Dangerous Goods by Rail - Table A: Dangerous Goods List - RID 2013 (English)
- International Maritime Dangerous Goods Requirements (IMDG Code)
- International Maritime Dangerous Goods Requirements (IMDG Code) - Substance Index
- Australia - Dangerous Goods Code (ADG Code) - List of Emergency Action Codes
- Australia - Dangerous Goods Code (ADG Code) - Dangerous Goods List
- International Air Transport Association (IATA) - Dangerous Goods Regulations
- WHO Guidelines for Drinking-water Quality - Chemicals for which guideline values have not been established
- Australia - Australian Capital Territory - Environment Protection Regulation: Ambient environmental standards (Domestic water supply - inorganic chemicals)
- Australia - Australian Capital Territory - Environment Protection Regulation: Ambient environmental standards (Domestic water supply quality)
- Australia - Australian Capital Territory - Environment Protection Regulation: Pollutants entering waterways taken to cause environmental harm (STOCK)
- Australia - Australian Capital Territory - Environment Protection Regulation: Pollutants entering waterways taken to cause environmental harm - Domestic water supply quality
- Australia - Australian Capital Territory - Environment Protection Regulation: Ambient environmental standards (STOCK - inorganic chemicals)
- Australia - Drinking Water Guideline Values For Physical and Chemical Characteristics
- International Maritime Dangerous Goods Requirements (IMDG Code) - Marine Pollutants
- Australia Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP) - Schedule 6
- Australia Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP) - Schedule 5
- Australia Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP) - Schedule 4
- Australia Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP) - Schedule 3
- Australia Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP) - Schedule 2
- Australia Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP) - Schedule 1
- Australia Standard for the Uniform Scheduling of Medicines and Poisons
- Australia Standard for the Uniform Scheduling of Medicines and Poisons - Appendix E (Part 2)
- Australia Standard for the Uniform Scheduling of Medicines and Poisons - Appendix A
- Australia National Pollutant Inventory

SECTION 16 Other information

Other information

Classification of the preparation and its individual components has drawn on official and authoritative sources as well as independent review by the Chemwatch Classification committee using available literature references.

A list of reference resources used to assist the committee may be found at:
www.chemwatch.net/references

The (M)SDS is a Hazard Communication tool and should be used to assist in the Risk Assessment. Many factors determine whether the reported Hazards are Risks in the workplace or other settings. Risks may be determined by reference to Exposures Scenarios. Scale of use, frequency of use and current or available engineering controls must be considered.

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