

Wynn's Silicone Lube (Professional Formula)

ITW AAMTech

Chemwatch Hazard Alert Code: 1

Chemwatch: 4957-13

Version No: 13.1.1.1

Safety Data Sheet according to the Health and Safety at Work (Hazardous Substances) Regulations 2017

Issue Date: 30/12/2020

Print Date: 29/03/2021

S.GHS.NZL.EN

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

Product Identifier

Product name	Wynn's Silicone Lube (Professional Formula)
Chemical Name	Not Applicable
Synonyms	Product Code: 52850
Proper shipping name	AEROSOLS
Chemical formula	Not Applicable
Other means of identification	Not Available

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

Relevant identified uses	Water proofing lubricant. Application is by spray atomisation from a hand held aerosol pack
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Details of the supplier of the safety data sheet

Registered company name	Autoserv New Zealand Ltd
Address	2/38 Trugood Drive East Tamaki, Auckland New Zealand
Telephone	+64 800 438 996
Fax	Not Available
Website	www.autoserv.co.nz
Email	iwarehouse@autoserv.co.nz

Emergency telephone number

Association / Organisation	CHEMWATCH EMERGENCY RESPONSE
Emergency telephone numbers	+64 800 700 112
Other emergency telephone numbers	

Once connected and if the message is not in your preferred language then please dial 01

SECTION 2 Hazards identification



Classification of the substance or mixture

Considered a Hazardous Substance according to the criteria of the New Zealand Hazardous Substances New Organisms legislation. Classified as Dangerous Goods for transport purposes.

Classification [1]	Flammable Aerosols Category 1, Acute Invertebrate Hazard Category 2
Legend:	1. Classified by Chemwatch; 2. Classification drawn from CCID EPA NZ; 3. Classification drawn from Regulation (EU) No 1272/2008 - Annex VI
Determined by Chemwatch using GHS/HSNO criteria	2.1.2A, 9.4B

Label elements

Wynn's Silicone Lube (Professional Formula)

Hazard pictogram(s)	 
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Signal word	Danger
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Hazard statement(s)

H222	Extremely flammable aerosol.
H442	Toxic to terrestrial invertebrates

Precautionary statement(s) General

P101	If medical advice is needed, have product container or label at hand.
P102	Keep out of reach of children.
P103	Read label before use.

Precautionary statement(s) Prevention

P210	Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.
P211	Do not spray on an open flame or other ignition source.
P251	Do not pierce or burn, even after use.
P273	Avoid release to the environment.

Precautionary statement(s) Response

P391	Collect spillage.
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Precautionary statement(s) Storage

P410+P412	Protect from sunlight. Do not expose to temperatures exceeding 50 °C/122 °F.
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Precautionary statement(s) Disposal

P501	Dispose of contents/container to authorised hazardous or special waste collection point in accordance with any local regulation.
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SECTION 3 Composition / information on ingredients

Substances

See section below for composition of Mixtures

Mixtures

CAS No	%[weight]	Name
63148-62-9	5	<u>polydimethylsiloxane</u>
68476-85-7.	95	<u>hydrocarbon propellant</u>

SECTION 4 First aid measures

Description of first aid measures

Eye Contact	<p>If aerosols come in contact with the eyes:</p> <ul style="list-style-type: none"> ▶ Immediately hold the eyelids apart and flush the eye with fresh 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. ▶ Seek medical attention without delay; if pain persists or recurs seek medical attention. ▶ Removal of contact lenses after an eye injury should only be undertaken by skilled personnel.
Skin Contact	<p>If skin or hair contact occurs:</p> <ul style="list-style-type: none"> ▶ Flush skin and hair with running water (and soap if available). ▶ Seek medical attention in event of irritation.
Inhalation	<p>If aerosols, fumes or combustion products are inhaled:</p> <ul style="list-style-type: none"> ▶ Remove to fresh air. ▶ Lay patient down. Keep warm and rested.

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	<ul style="list-style-type: none"> ▶ Prostheses such as false teeth, which may block airway, should be removed, where possible, prior to initiating first aid procedures. ▶ If breathing is shallow or has stopped, ensure clear airway and apply resuscitation, 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	<ul style="list-style-type: none"> ▶ If swallowed do NOT induce vomiting. ▶ If vomiting occurs, lean patient forward or place on left side (head-down position, if possible) to maintain open airway and prevent aspiration. ▶ Observe the patient carefully. ▶ Never give liquid to a person showing signs of being sleepy or with reduced awareness; i.e. becoming unconscious. ▶ Give water to rinse out mouth, then provide liquid slowly and as much as casualty can comfortably drink. ▶ Seek medical advice.

Indication of any immediate medical attention and special treatment needed

For acute or short term repeated exposures to petroleum distillates or related hydrocarbons:

- ▶ Primary threat to life, from pure petroleum distillate ingestion and/or inhalation, is respiratory failure.
- ▶ Patients should be quickly evaluated for signs of respiratory distress (e.g. cyanosis, tachypnoea, intercostal retraction, obtundation) and given oxygen. Patients with inadequate tidal volumes or poor arterial blood gases (pO2 50 mm Hg) should be intubated.
- ▶ Arrhythmias complicate some hydrocarbon ingestion and/or inhalation and electrocardiographic evidence of myocardial injury has been reported; intravenous lines and cardiac monitors should be established in obviously symptomatic patients. The lungs excrete inhaled solvents, so that hyperventilation improves clearance.
- ▶ A chest x-ray should be taken immediately after stabilisation of breathing and circulation to document aspiration and detect the presence of pneumothorax.
- ▶ Epinephrine (adrenalin) is not recommended for treatment of bronchospasm because of potential myocardial sensitisation to catecholamines. Inhaled cardioselective bronchodilators (e.g. Alupent, Salbutamol) are the preferred agents, with aminophylline a second choice.
- ▶ Lavage is indicated in patients who require decontamination; ensure use of cuffed endotracheal tube in adult patients. [Ellenhorn and Barceloux: Medical Toxicology]

Treat symptomatically.

SECTION 5 Firefighting measures

Extinguishing media

SMALL FIRE:

- ▶ Water spray, dry chemical or CO2

LARGE FIRE:

- ▶ Water spray or fog.

Special hazards arising from the substrate or mixture

Fire Incompatibility	<ul style="list-style-type: none"> ▶ Avoid contamination with oxidising agents i.e. nitrates, oxidising acids, chlorine bleaches, pool chlorine etc. as ignition may result
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Advice for firefighters

Fire Fighting	<ul style="list-style-type: none"> ▶ Alert Fire Brigade and tell them location and nature of hazard. ▶ May be violently or explosively reactive. ▶ Wear breathing apparatus plus protective gloves. ▶ Prevent, by any means available, spillage from entering drains or water course.
Fire/Explosion Hazard	<ul style="list-style-type: none"> ▶ Liquid and vapour are highly flammable. ▶ Severe fire hazard when exposed to heat or flame. ▶ Vapour forms an explosive mixture with air. ▶ Severe explosion hazard, in the form of vapour, when exposed to flame or spark. <p>Combustion products include: carbon dioxide (CO2) silicon dioxide (SiO2) other pyrolysis products typical of burning organic material.</p>

SECTION 6 Accidental release measures

Personal precautions, protective equipment and emergency procedures

See section 8

Environmental precautions

See section 12

Methods and material for containment and cleaning up

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Minor Spills	<ul style="list-style-type: none"> ▸ Clean up all spills immediately. ▸ Avoid breathing vapours and contact with skin and eyes. ▸ Wear protective clothing, impervious gloves and safety glasses. ▸ Shut off all possible sources of ignition and increase ventilation.
Major Spills	<ul style="list-style-type: none"> ▸ Clear area of personnel and move upwind. ▸ Alert Fire Brigade and tell them location and nature of hazard. ▸ May be violently or explosively reactive. ▸ Wear breathing apparatus plus protective gloves.

Personal Protective Equipment advice is contained in Section 8 of the SDS.

SECTION 7 Handling and storage

Precautions for safe handling

Safe handling	<ul style="list-style-type: none"> ▸ 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	<ul style="list-style-type: none"> ▸ Store below 38 deg. C. ▸ Keep dry to avoid corrosion of cans. Corrosion may result in container perforation and internal pressure may eject contents of can ▸ Store in original containers in approved flammable liquid storage area. ▸ DO NOT store in pits, depressions, basements or areas where vapours may be trapped. ▸ No smoking, naked lights, heat or ignition sources. ▸ Keep containers securely sealed.

Conditions for safe storage, including any incompatibilities

Suitable container	<ul style="list-style-type: none"> ▸ Aerosol dispenser. ▸ Check that containers are clearly labelled.
Storage incompatibility	<ul style="list-style-type: none"> ▸ Avoid reaction with oxidising agents

SECTION 8 Exposure controls / personal protection

Control parameters

Occupational Exposure Limits (OEL)

INGREDIENT DATA

Source	Ingredient	Material name	TWA	STEL	Peak	Notes
New Zealand Workplace Exposure Standards (WES)	hydrocarbon propellant	LPG (Liquefied petroleum gas)	1000 ppm / 1800 mg/m3	Not Available	Not Available	Not Available

Emergency Limits


Ingredient	TEEL-1	TEEL-2	TEEL-3
polydimethylsiloxane	65 mg/m3	720 mg/m3	4,300 mg/m3
hydrocarbon propellant	65,000 ppm	2.30E+05 ppm	4.00E+05 ppm

Ingredient	Original IDLH	Revised IDLH
polydimethylsiloxane	Not Available	Not Available
hydrocarbon propellant	2,000 ppm	Not Available

Exposure controls

Appropriate engineering controls	<p>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.</p> <p>The basic types of engineering controls are:</p> <p>Process controls which involve changing the way a job activity or process is done to reduce the risk.</p> <p>Enclosure and/or isolation of emission source which keeps a selected hazard "physically" away from the worker and ventilation that strategically "adds" and "removes" air in the work environment.</p>
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Personal protection	
Eye and face protection	No special equipment for minor exposure i.e. when handling small quantities. OTHERWISE: For potentially moderate or heavy exposures: <ul style="list-style-type: none"> ▸ Safety glasses with side shields. ▸ NOTE: Contact lenses pose a special hazard; soft lenses may absorb irritants and ALL lenses concentrate them.
Skin protection	See Hand protection below
Hands/feet protection	<ul style="list-style-type: none"> ▸ No special equipment needed when handling small quantities. ▸ OTHERWISE: ▸ For potentially moderate exposures: ▸ Wear general protective gloves, eg. light weight rubber gloves. ▸ For potentially heavy exposures: ▸ Wear chemical protective gloves, eg. PVC. and safety footwear.
Body protection	See Other protection below
Other protection	No special equipment needed when handling small quantities. OTHERWISE: <ul style="list-style-type: none"> ▸ Overalls. ▸ Skin cleansing cream. ▸ Eyewash unit.

Respiratory protection

Type AX-P Filter of sufficient capacity. (AS/NZS 1716 & 1715, EN 143:2000 & 149:2001, ANSI Z88 or national equivalent)

- Cartridge respirators should never be used for emergency ingress or in areas of unknown vapour concentrations or oxygen content.
- The wearer must be warned to leave the contaminated area immediately on detecting any odours through the respirator. The odour may indicate that the mask is not functioning properly, that the vapour concentration is too high, or that the mask is not properly fitted. Because of these limitations, only restricted use of cartridge respirators is considered appropriate.
- Cartridge performance is affected by humidity. Cartridges should be changed after 2 hr of continuous use unless it is determined that the humidity is less than 75%, in which case, cartridges can be used for 4 hr. Used cartridges should be discarded daily, regardless of the length of time used

SECTION 9 Physical and chemical properties**Information on basic physical and chemical properties**

Appearance	Clear, colourless, odourless liquid; not miscible with water. Supplied as an aerosol pack. Contents under PRESSURE . Contains highly flammable hydrocarbon propellant.		
Physical state	Liquid	Relative density (Agua= 1)	0.835
Odour	Not Available	Partition coefficient n-octanol / water	Not Available
Odour threshold	Not Available	Auto-ignition temperature (°C)	>210
pH (as supplied)	Not Applicable	Decomposition temperature	Not Available
Melting point / freezing point (°C)	-59	Viscosity (cSt)	Not Applicable
Initial boiling point and boiling range (°C)	>101	Molecular weight (g/mol)	Not Applicable
Flash point (°C)	>300 bulk	Taste	Not Available
Evaporation rate	Not Available	Explosive properties	Not Available
Flammability	Not Applicable	Oxidising properties	Not Available
Upper Explosive Limit (%)	6.0-33.0	Surface Tension (dyn/cm or mN/m)	Not Available
Lower Explosive Limit (%)	1.2-5.0	Volatile Component (%vol)	>80
Vapour pressure (kPa)	Not Available	Gas group	Not Available
Solubility in water	Immiscible	pH as a solution (1%)	Not Applicable
Vapour density (Air = 1)	Not Available	VOC g/L	Not Available

SECTION 10 Stability and reactivity

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Reactivity	See section 7
Chemical stability	<ul style="list-style-type: none"> ▶ Elevated temperatures. ▶ Presence of open flame. ▶ 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	Inhalation of vapours may cause drowsiness and dizziness. This may be accompanied by sleepiness, reduced alertness, loss of reflexes, lack of co-ordination, and vertigo. WARNING: Intentional misuse by concentrating/inhaling contents may be lethal.
Ingestion	Not normally a hazard due to physical form of product. Ingestion may result in nausea, abdominal irritation, pain and vomiting
Skin Contact	There is some evidence to suggest that this material can cause inflammation of the skin on contact in some persons.
Eye	Although the liquid is not thought to be an irritant (as classified by EC Directives), direct contact with the eye may produce transient discomfort characterised by tearing or conjunctival redness (as with windburn).
Chronic	Long-term exposure to the product is not thought to produce chronic effects adverse to the health (as classified by EC Directives using animal models); nevertheless exposure by all routes should be minimised as a matter of course.

Wynn's Silicone Lube (Professional Formula)	TOXICITY	IRRITATION
	Not Available	Not Available
polydimethylsiloxane	TOXICITY	IRRITATION
	Dermal (rabbit) LD50: >2000 mg/kg ^[2] Oral(Rat) LD50; >17000 mg/kg ^[2]	Eye (rabbit): 100 mg/1h - mild
hydrocarbon propellant	TOXICITY	IRRITATION
	Inhalation(Rat) LC50; 658 mg/l ^[2]	Not Available
Legend:	1. Value obtained from Europe ECHA Registered Substances - Acute toxicity 2. * Value obtained from manufacturer's SDS. Unless otherwise specified data extracted from RTECS - Register of Toxic Effect of chemical Substances	

POLYDIMETHYLSILOXANE	No toxic response noted during 90 day subchronic inhalation toxicity studies The no observable effect level is 450 mg/m3. Non-irritating and non-sensitising in human patch test. [Xerox]* Siloxanes may impair liver and hormonal function, as well as the lung and kidney. They have not been found to be irritating to the skin and eyes. They may potentially cause cancer (tumours of the womb in females) and may cause impaired fertility or infertility. The material may be irritating to the eye, with prolonged contact causing inflammation. Repeated or prolonged exposure to irritants may produce conjunctivitis.
HYDROCARBON PROPELLANT	inhalation of the gas
Wynn's Silicone Lube (Professional Formula) & HYDROCARBON PROPELLANT	No significant acute toxicological data identified in literature search.

Acute Toxicity	✗	Carcinogenicity	✗
Skin Irritation/Corrosion	✗	Reproductivity	✗
Serious Eye Damage/Irritation	✗	STOT - Single Exposure	✗
Respiratory or Skin sensitisation	✗	STOT - Repeated Exposure	✗
Mutagenicity	✗	Aspiration Hazard	✗

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Legend: ✘ – Data either not available or does not fill the criteria for classification
✔ – Data available to make classification

SECTION 12 Ecological information

Toxicity

Wynn's Silicone Lube (Professional Formula)	Endpoint	Test Duration (hr)	Species	Value	Source
	Not Available	Not Available	Not Available	Not Available	Not Available

polydimethylsiloxane	Endpoint	Test Duration (hr)	Species	Value	Source
	Not Available	Not Available	Not Available	Not Available	Not Available

hydrocarbon propellant	Endpoint	Test Duration (hr)	Species	Value	Source
	LC50	96	Fish	24.11mg/l	2
	EC50(ECx)	96	Algae or other aquatic plants	7.71mg/l	2
	EC50	96	Algae or other aquatic plants	7.71mg/l	2
	LC50	96	Fish	24.11mg/l	2
	EC50(ECx)	96	Algae or other aquatic plants	7.71mg/l	2
	EC50	96	Algae or other aquatic plants	7.71mg/l	2

Legend: *Extracted from 1. IUCLID Toxicity Data 2. Europe ECHA Registered Substances - Ecotoxicological Information - Aquatic Toxicity 3. EPIWIN Suite V3.12 (QSAR) - Aquatic Toxicity Data (Estimated) 4. US EPA, Ecotox database - Aquatic Toxicity Data 5. ECETOC Aquatic Hazard Assessment Data 6. NITE (Japan) - Bioconcentration Data 7. METI (Japan) - Bioconcentration Data 8. Vendor Data*

DO NOT discharge into sewer or waterways.

Persistence and degradability

Ingredient	Persistence: Water/Soil	Persistence: Air
	No Data available for all ingredients	No Data available for all ingredients

Bioaccumulative potential

Ingredient	Bioaccumulation
	No Data available for all ingredients

Mobility in soil

Ingredient	Mobility
	No Data available for all ingredients

SECTION 13 Disposal considerations

Waste treatment methods

Product / Packaging disposal	
	<ul style="list-style-type: none"> ▶ Consult State Land Waste Management Authority for disposal. ▶ Discharge contents of damaged aerosol cans at an approved site. ▶ Allow small quantities to evaporate. ▶ DO NOT incinerate or puncture aerosol cans.

Ensure that the hazardous substance is disposed in accordance with the Hazardous Substances (Disposal) Notice 2017

Disposal Requirements

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Packages that have been in direct contact with the hazardous substance must be only disposed if the hazardous substance was appropriately removed and cleaned out from the package. The package must be disposed according to the manufacturer's directions taking into account the material it is made of. Packages which hazardous content have been appropriately treated and removed may be recycled.

The hazardous substance must only be disposed if it has been treated by a method that changed the characteristics or composition of the substance and it is no longer hazardous.

SECTION 14 Transport information

Labels Required

	
Marine Pollutant	NO
HAZCHEM	Not Applicable

Land transport (UN)

UN number	1950	
UN proper shipping name	AEROSOLS	
Transport hazard class(es)	Class	2.1
	Subrisk	Not Applicable
Packing group	Not Applicable	
Environmental hazard	Not Applicable	
Special precautions for user	Special provisions	63; 190; 277; 327; 344; 381
	Limited quantity	1000ml

Air transport (ICAO-IATA / DGR)

UN number	1950	
UN proper shipping name	Aerosols, flammable	
Transport hazard class(es)	ICAO/IATA Class	2.1
	ICAO / IATA Subrisk	Not Applicable
	ERG Code	10L
Packing group	Not Applicable	
Environmental hazard	Not Applicable	
Special precautions for user	Special provisions	A145 A167 A802
	Cargo Only Packing Instructions	203
	Cargo Only Maximum Qty / Pack	150 kg
	Passenger and Cargo Packing Instructions	203
	Passenger and Cargo Maximum Qty / Pack	75 kg
	Passenger and Cargo Limited Quantity Packing Instructions	Y203
	Passenger and Cargo Limited Maximum Qty / Pack	30 kg G

Sea transport (IMDG-Code / GGVSee)

UN number	1950	
UN proper shipping name	AEROSOLS	
Transport hazard class(es)	IMDG Class	2.1
	IMDG Subrisk	Not Applicable
Packing group	Not Applicable	
Environmental hazard	Not Applicable	

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Special precautions for user	EMS Number	F-D , S-U
	Special provisions	63 190 277 327 344 381 959
	Limited Quantities	1000 ml

Transport in bulk according to Annex II of MARPOL and the IBC code

Not Applicable

Transport in bulk in accordance with MARPOL Annex V and the IMSBC Code

Product name	Group
polydimethylsiloxane	Not Available
hydrocarbon propellant	Not Available

Transport in bulk in accordance with the ICG Code

Product name	Ship Type
polydimethylsiloxane	Not Available
hydrocarbon propellant	Not Available

SECTION 15 Regulatory information

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

This substance is to be managed using the conditions specified in an applicable Group Standard

HSR Number	Group Standard
HSR002515	Aerosols (Flammable) Group Standard 2017

polydimethylsiloxane is found on the following regulatory lists

New Zealand Approved Hazardous Substances with controls
New Zealand Hazardous Substances and New Organisms (HSNO) Act - Classification of Chemicals

New Zealand Hazardous Substances and New Organisms (HSNO) Act - Classification of Chemicals - Classification Data
New Zealand Inventory of Chemicals (NZIoC)

hydrocarbon propellant is found on the following regulatory lists

Chemical Footprint Project - Chemicals of High Concern List
New Zealand Approved Hazardous Substances with controls
New Zealand Hazardous Substances and New Organisms (HSNO) Act - Classification of Chemicals

New Zealand Hazardous Substances and New Organisms (HSNO) Act - Classification of Chemicals - Classification Data
New Zealand Inventory of Chemicals (NZIoC)
New Zealand Workplace Exposure Standards (WES)

Hazardous Substance Location

Subject to the Health and Safety at Work (Hazardous Substances) Regulations 2017.

Hazard Class	Quantity (Closed Containers)	Quantity (Open Containers)
2.1.2A	3 000 L (aggregate water capacity)	3 000 L (aggregate water capacity)

Certified Handler

Subject to Part 4 of the Health and Safety at Work (Hazardous Substances) Regulations 2017.

Class of substance	Quantities
Not Applicable	Not Applicable

Refer Group Standards for further information

Maximum quantities of certain hazardous substances permitted on passenger service vehicles

Subject to Regulation 13.14 of the Health and Safety at Work (Hazardous Substances) Regulations 2017.

Hazard Class	Gas (aggregate water capacity in mL)	Liquid (L)	Solid (kg)	Maximum quantity per package for each classification
2.1.2A				1L (aggregate water capacity)

Tracking Requirements

Not Applicable

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National Inventory Status

National Inventory	Status
Australia - AIIIC / Australia Non-Industrial Use	Yes
Canada - DSL	Yes
Canada - NDSL	No (polydimethylsiloxane; hydrocarbon propellant)
China - IECSC	Yes
Europe - EINEC / ELINCS / NLP	No (polydimethylsiloxane)
Japan - ENCS	No (polydimethylsiloxane)
Korea - KECI	Yes
New Zealand - NZIoC	Yes
Philippines - PICCS	Yes
USA - TSCA	Yes
Taiwan - TCSI	Yes
Mexico - INSQ	Yes
Vietnam - NCI	Yes
Russia - FBEPH	Yes
Legend:	Yes = All CAS declared ingredients are on the inventory No = One or more of the CAS listed ingredients are not on the inventory and are not exempt from listing(see specific ingredients in brackets)

SECTION 16 Other information

Revision Date	30/12/2020
Initial Date	25/05/2004

SDS Version Summary

Version	Issue Date	Sections Updated
12.1.1.1	01/11/2019	One-off system update. NOTE: This may or may not change the GHS classification
13.1.1.1	30/12/2020	Classification change due to full database hazard calculation/update.

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.

The 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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