UN/SCEGHS/23/INF.24

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals **27 June 2012**

Twenty–third session
Geneva, 4 (p.m) – 6 July 2012
Item 4 (a) of the provisional agenda
Implementation of the GHS: Implementation issues

Guiding principles for developing a global list of classified chemicals

Transmitted by the International Petroleum Industry Environmental Conservation Association (IPIECA)

Background

1. ST/SG/AC.10/C.4/2012/10 proposes to establish guiding principles for developing a global list of classified chemicals to facilitate future discussions, to establish the criteria for reviewing existing lists, and to serve as the guidelines for evaluating possible options for the creation of a global list of classified chemicals. This paper reacts to the proposed guiding principles for developing a global list of classified chemicals and offers recommendations on the principles to enhance the transparency and usefulness of any global list of classified chemicals developed by the GHS Sub-Committee (UNSCEGHS).

Comments

2. IPIECA supports harmonization of hazard classification for chemicals that are distributed internationally, with a particular interest in petroleum substances. Diverging datasets and chemical classifications impede effective hazard communication, thus development of a global list of classified chemicals is an important but also a complex and resource-intensive effort. We would like to communicate the following input regarding the UNSCEGHS guiding principles for development of a list of chemicals classified in accordance with GHS.

3. **Guiding principle (a)**: The principle on transparency and stakeholder input is very important, and it is appropriate that it is the first principle listed. The principle could be stronger by inclusion of language to ensure that input will be solicited and considered from a broad group of stakeholders, not limited only to entities with UN consultative status. The mechanism to obtain broader stakeholder input would need to be discussed. Furthermore, we agree that chemical classifications should be based solely on the GHS criteria and principles.

4. **Guiding principle (b):** The appropriate goal is to include all GHS hazard categories and classes on the global list, as stated in this principle. However, developing and maintaining an international classification list of hazardous chemicals will be very resource intensive. Practically speaking, it will be important to prioritize resources to

develop a list that has maximum impact and value for the resources expended. This will likely involve priority-setting and proceeding in a stepwise fashion. Thus, it may be helpful to enhance this principle to reflect that, while including all GHS hazard categories and classes on the global list is the eventual goal, it may require a phased approach involving priority setting.

5. **Guiding principle (c):** This principle is appropriate. Existing classification lists are typically available for substances, and the GHS already contains criteria for the classification of mixtures. The feasibility of including true mixtures cannot be supported due to a number of practical considerations.

6. **Guiding principle (e):** The guiding principle is appropriate but could go farther. It states that data that are the basis for chemical classification must be referenced within the classification and readily and publicly available. However, it does not address the important issue of data quality. Any global list of classified chemicals should be based on a rigorous, evidence-based scientific process to be defined in advance and applied globally. It should also have defined criteria for source data and include a mechanism for updates as new evidence becomes available. We suggest that the guiding principles include basing classification on a defined evidence-based scientific process, defining criteria for source data, and including a mechanism for updates.

7. **Guiding principle (f):** The global list of chemical classifications will be non-binding, but an international list of chemicals classified in terms of the GHS has the most value when all countries implementing the GHS accept it. The benefits of an international list of chemicals classified in terms of the GHS include supporting cost-effective implementation; avoiding duplication of effort; and promoting harmonization/consistency in classification. These benefits apply to everyone and will be greater in countries without national GHS implementing legislation and regulation. Thus, we suggest that the guiding principles include promoting eventual widespread adoption of the list, including UN encouragement and assistance for doing so.

8. The principles should recognize that a basic premise of the GHS is self-classification, which is the basis of GHS implementation in several UN member states. The self-classification construct could be stated in a new guiding principle (g) or revisions to current guiding principle (f). Also, the UNSCEGHS should consider who will maintain the list and how conflicts and disagreements would get resolved.

9. In promoting product stewardship, the global oil and gas industry has developed data on recommended approaches for the classification of petroleum substances. To encourage harmonized and consistent classification, the regional petroleum industry associations are willing to share this information to assist in developing an international list of chemicals classified in terms of the GHS. However, the first step in developing any global list should be developing the criteria to evaluate existing data that would be reviewed in development of a UNSCEGHS classification list.