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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
Transport of Dangerous Goods
(Twenty-fourth session, 1-10 December 2003,
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HARMONIZATION WITH THE GLOBALLY HARMONIZED SYSTEM OF
CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Hazards to the aquatic environment

Transmitted by the expert from the Netherlands

BACKGROUND

In July 2002 the Sub-Committee discussed a document from the Netherlands concerning the classification of substances hazardous to the aquatic environment (ST/SG/AC.10/C.3/2002/52). Several experts supported the proposal by the Netherlands that the GHS criteria for classification should be applicable to all substances and mixtures under transport regulations and that the GHS label should be required for all substances and mixtures meeting these criteria. Other experts considered that, for practical reasons, it was inappropriate to introduce the classification criteria on the UN Model Regulations immediately, but that more consultation with the industry and IMO was necessary before introducing hazard communication elements based on the GHS. The Sub-Committee agreed that, apart from the introduction of classification criteria, the various options to be envisaged for fully implementing the GHS through the UN Model Regulations as regards hazards to the aquatic environment could be considered only during the 2003-2004 biennium (paragraphs 135-137 report ST/SG/AC.10/C.3/42).

INTRODUCTION

In document ST/SG/AC.10/C.3/2002/52 the Netherlands indicated that in order to comply with the GHS:

- the criteria for hazards to the aquatic environment should be applicable to all substances and mixtures;
- substances and mixtures classified as hazardous to the aquatic environment should be labelled with the GHS label for this hazard.

At that time the Netherlands suggested two options to implement the GHS for hazards to the aquatic environment into the UN recommendations:

Option 1 introduce a new class for substances and mixtures hazardous to the aquatic environment (e.g Class 9.1: aquatic pollutants).

Option 2 introduce a system whereby the substances and mixtures hazardous to the aquatic environment are identified as such by means of a mark. A system similar to the existing system for marine pollutants in the IMDG Code.

CONSIDERATIONS

In considering the two options the Netherlands followed the principle that the hazards of class 1 to 8 should always take precedence over the hazard to the aquatic environment. Consequently no additional requirements are deemed necessary for packing, tank provisions, limited quantities etc.

Only classification, identification and documentation are deemed to be relevant for this hazard and should therefore be taken into account for the implementation of the GHS with regards to substances and mixtures hazardous to the aquatic environment.

CONCLUSION

Based on the above mentioned considerations the Netherlands are of the opinion that it is not justified to create a new class for this hazard.

In order to facilitate the discussion the Netherlands will prepare an information paper in which the possible amendments to the UN Recommendations based on option 2 will be presented.

Furthermore it should be noted that the basic principle of the GHS is self classification by the industry. Therefore the industry will be responsible for the classification and could eventually develop a list of substances and mixtures hazardous to the aquatic environment.
