

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

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IMPLEMENTATION ISSUES

Summary of activities of the informal working group on implementation issues

Transmitted by the expert from Australia on behalf of the informal working group

A. BACKGROUND

1. At the 14th meeting of the Sub-Committee of Experts on the GHS, it was agreed to establish an informal working group on GHS implementation, in accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.4/24, Annex 2 and ST/SG/AC.10/34, para. 14).¹

2. The Sub-Committee's function, as described in paragraph 1.1.3.2.1 of the GHS document, includes the following responsibilities:

- (a) To act as custodian of the GHS, managing and giving direction to the harmonization process...;
- (b) To promote understanding and use of the GHS and to encourage feedback;
- (c) To make the GHS available for worldwide use and application;
- (d) To make guidance available on the application of the GHS.

3. On the basis of these functions, documents ST/SG/AC.10/C.4/2007/11 and UN/SCEGHS/14/INF.26 (Australia, Canada, South Africa, Thailand, United Kingdom, United States of America and the World Health Organization) proposed a way forward for the Sub-Committee to play an enhanced role in addressing implementation issues for the GHS.

¹ Pending final endorsement by the Sub-Committee of Experts on the Transport of Dangerous Goods at its thirty-second session (July 2008).

4. It was agreed that the informal working group on implementation could contribute to the role of the Sub-Committee to assist countries in implementing the GHS in a consistent and timely manner by:

- (a) Facilitating exchange of information relating to GHS implementation in countries;
- (b) Providing a forum for discussion for particular issues faced by specific sectors and allowing the sharing of information from experiences on sector-specific GHS implementation dealing with, for example, consumer chemicals, transport, workplace, etc. This should not prevent each country submitting their implementation issues directly to the Sub-Committee. If transport-related issues are identified, these will be referred to the TDG Sub-Committee;
- (c) Identifying general issues arising in the implementation of the GHS, such as building block approaches, problems relating to specific hazard classes or categories, transitional arrangements, and training;
- (d) Analysing and summarising issues identified on the implementation of the GHS. If possible, suggestions for how such issues can be addressed in a harmonized way will be submitted to the Sub-Committees for their consideration and resolution.

5. It was also agreed that a report of issues from the informal working group would be presented to the Sub-Committee at each session. This paper provides such a report, and seeks views and advice from the Sub-Committee relating to the operation of the informal working group and the work ahead.

B. ACTIVITIES OF THE INFORMAL WORKING GROUP

6. Following the agreement to form an informal working group on implementation issues in December 2007, a draft discussion paper was prepared by Australia to facilitate dialogue between members of the informal working group on issues relating to impediments to implementation of the GHS. It was anticipated that the paper would assist in the development of an INF document for discussion at the fifteenth session of the Sub-Committee of Experts on the GHS (SCEGHS). Membership of the informal working group is provided in Annex A.

7. The draft discussion paper identified those areas of the GHS in which impediments to implementation had been identified in papers considered by the Sub-Committee in previous meetings, not all of which have been resolved. The issues included:

- (a) text or editorial issues in the GHS, where changes to the existing text, or the development of guidance material, might be necessary to clarify the intent of the document and/or to correct some of the terminology used in the document;
- (b) issues to do with the classification of mixtures;
- (c) classification and hazard communication issues within specific hazard classes; and
- (d) other issues, that could be broadly defined as general or 'policy' issues. The content of this discussion paper was sourced from documents discussed in the eleventh to fourteenth session of the Sub-Committee, mainly INF documents, namely:

Ref 1 - UN/SCEGHS/12/INF.12 (CEFIC)

Ref 2 - UN/SCEGHS/13/INF.6 (Pilot program to test mixtures classification criteria/US)

Ref 3 - UN/SCEGHS/14/INF.24 (EC)

Ref 4 - UN/SCEGHS/14/INF.15 (OECD workshop on the application of the GHS classification criteria to HPVC)

Ref 5 - UN/SCEGHS/14/INF.17 (Expert from Germany)

Ref 6 - UN/SCEGHS/11/INF.12 (Correspondence group on the building block approach)

Ref 7 - UN/SCEGHS/11/INF.20 (Expert from France)

Ref 8 - UN/SCEGHS/14/INF.16 (UNITAR)

Ref 9 - UN/SCEGHS/13/INF.10 (Expert from South Africa)

8. To assist in deliberations and discussion of implementation issues by the Sub-Committee, the informal working group was asked to comment on the relative priorities of the issues, on the understanding that resources were limited and that the Sub-Committee might find it more efficient to deal with issues of a higher priority.

9. A copy of the draft discussion paper was circulated to the informal working group in March 2008, and members were asked to respond to Australia by the end of April 2008 with their views on the issues identified. Comments were received from the UK, USA, Canada, Thailand, Norway and the EC, with some comments received in late May to allow the necessary national consultation process to take place. Members responded to the specific questions posed in the draft discussion paper, as well as providing their views on other issues that might be considered to be impediments to GHS implementation, and which might be considered by the informal working group in the future.

10. For the information of the Sub-Committee, the issues identified in the draft discussion paper are provided in Annex B, along with the summary of views provided by those informal working group members that responded to the document. It should be noted that these are simply the issues raised in earlier Sub-Committee papers and/or draft issues raised by members of the informal working group. A working document, from the informal working group on implementation, will be provided to the Sub-Committee in December 2008 so that the Sub-Committee can decide how to resolve some or all of the issues.

11. On the basis of the comments received from the informal working group members, this INF paper identifies the next steps for the informal working group, in advance of the 16th meeting of the Sub-Committee in December 2008. Recommendations from the informal working group on implementation to the Sub-Committee, either for amendments to the GHS or to develop guidance material or undertake other work aimed at assisting in implementation of the GHS, can be developed and communicated to the Sub-Committee as a working paper in December 2008.

C. NEXT STEPS

12. After the draft discussion document was circulated to the informal working group on implementation in March 2008, responses were received from five informal working group members. While these contributions were very valuable, and assisted in understanding the views that the different members have on the issues relating to GHS implementation, the Chair considers that there needs to be wider discussions with a greater number of informal working group members to truly assist the Sub-Committee in discussing implementation issues, and to formulate views on the issues identified in the draft discussion paper. Commitment is sought from members of the informal working group to increase the level of participation in the work of this group.

13. To facilitate this, the Chair has arranged for the informal working group to meet in the margins of the 15th meeting of the Sub-Committee in July 2008, and then exchange emails following that meeting, so that a working document can be prepared for the consideration of the Sub-Committee in December 2008.

D. ADVICE FROM THE SUB-COMMITTEE

14. The views of the Sub-Committee on the 'next steps' outlined above would be appreciated by the Chair of the informal working group.

15. On the basis of the comments received from members of the informal working group, the Chair feels that it should operate on the following basis:

- (a) That all implementation issues that are considered by the informal working group are consequently provided to the Sub-Committee, along with the views of the informal working group, to allow the Sub-Committee to make a decision on how to address the issues. This could be a recommendation to make changes to the text of the GHS, add projects to the work plan of the Sub-Committee, or agree that further work should be considered at a later date or is not warranted, for example. The Sub-Committee is the decision-making body for issues relating to the GHS, using the advice from the informal working group as one mechanism to reach their decisions.
- (b) That membership of the informal working group is extended to industry and other interested participants. The informal working group felt strongly that the expertise and skills available in the industry sector should be utilised, where possible, to deal with GHS implementation issues.
- (c) That issues for the Sub-Committee be broadly arranged and prioritised into the following groups:
 - (i) issues that require immediate attention by the Sub-Committee (including changes to the GHS and adding projects to the work plan of the Sub-Committee);
 - (ii) issues that should be referred to other informal working groups or UNSCEGHS Focal Points already established by the Sub-Committee;
 - (iv) issues that are useful for consideration by the Sub-Committee, but which do not require immediate action, or where further experience in GHS implementation is needed before a decision can be made by the Sub-Committee, and;
 - (v) issues that have been addressed and which no longer require the attention of the Sub-Committee.
- (d) That the informal working group continues to liaise with the Sub-Committee and other informal groups to assist in addressing GHS implementation issues, and report these interactions to the Sub-Committee at each meeting. Where possible, interactions with outside groups or inter-governmental organisations to assist in the dissemination of GHS information to a wide range of countries should be encouraged.

16. Advice from the Sub-Committee is sought on the informal working group's operational arrangements listed in the paragraph above.

17. Advice is also sought about how best to deal with those issues that should be referred to other informal working groups. For example, a number of draft issues in Annex B may best be referred to the Mixtures informal working group, in the opinion of the Chair of the informal working group. However, the Sub-Committee needs to decide whether the current work of the Mixtures informal working group is complete, or whether that informal working group should continue to address mixtures issues in future. If the informal working group on mixtures ceases to exist, the Sub-Committee will need to decide how best to address the implementation issues relating to mixtures in Annex B.

18. Finally, the views of the Sub-Committee are sought on any or all of the issues described in Annex B to this paper. The views can be communicated via representatives on the informal working group on implementation, or directly to the Chair (Australia). These views will assist in the formulation of a working paper for consideration by the Sub-Committee in December 2008.

Annex AMembership list (23 June 2008)

1. Andre Fenner (Email: Andre.Fenner@saude.gov.br)
2. Annette Schytz (Email: ASC@MST.DK)
3. Brenda Everson (Email: Brenda_Everson@hc-sc.gc.ca)
4. Cheryl Chang (Email: Cheryl.CHANG@unitar.org)
5. Christine Bjorge (Email: christine.bjorge@sft.no)
6. Dan Marcel Barbut (Email: danbarbut@gmail.com)
7. David Gilabert (Email: david.gilabert@astra.admin.ch)
8. Dr Robin Foster (Email: Robin.Foster@hse.gsi.gov.uk)
9. Dr Thomas Gebel (Email: Gebel.Thomas@baua.bund.de)
10. Dr Uta Jensen-Korte (Email: Uta.JENSEN-KORTE@ec.europa.eu)
11. Elsie Snyman (Email: Elsie.Snyman@sasol.com)
12. Hermann Goetsch (Email: hermann.Goetsch@lebensministerium.at)
13. Hiroshi Jonai (Email: jonai@medwel.cst.nihon-u.ac.jp)
14. Jennifer Silk (Email: jennifer.silk@unitar.org)
15. Jesus Zepeda (Email: jzepeda@stps.gob.mx)
16. Jonathon Krueger (Email: jonathan.krueger@unitar.org)
17. Kim Headrick (Email: Kim_Headrick@hc-sc.gc.ca)
18. Lesley Onyon (Email: onyonl@who.int)
19. Mary-Frances Lowe (Email: Lowe.MaryFrances@epa.gov)
20. Markus Hofmann (Email: markus.hofmann@bag.admin.ch)
21. Maureen O'Donnell (Email: odonnell.maureen@dol.gov)
22. Paola Di Prospero Fanghella (Email: paola.diprospero@iss.it)
23. Peter Dawson (Email: Peter.Dawson@ermanz.govt.nz)
24. Roqueiro Correa (Email: rocorrea@inmetro.gov.br)
25. Roque Puiatti (Email: rpuiatti@via-rs.net)
26. Rosa Garcia Couto (Email: Rosa.Garcia.Couto@unece.org)
27. Solvar Hardeng (Email: solvar.hardeng@sft.no)
28. Soodsakorn Putho (Email: soosakorn@diw.go.th)
29. Drew Wagner (drew.wagner@deewr.gov.au)

Annex B

Implementation issues previously circulated to the informal working group March 2008

The following issues, gathered from INF documents previously considered by the GHS Sub-Committee or put forward for consideration by members of the informal working group on implementation, were collated into a draft discussion paper and circulated to the informal working group in March 2008. These issues are provided to the Sub-Committee for their information only, and further discussion on these issues by the informal working group on implementation will be undertaken in the 3rd quarter of 2008.

A number of the issues described in this paper are already being considered by the informal working group on mixtures, and other issues listed below may also be best addressed by that informal working group or other informal working groups that provide advice to the Sub-Committee.

1. Issues relating to terminology

Issue 1.1

The terms 'cut-off values' and 'concentration limits' are used broadly and are equivalent in the GHS. The informal working group will discuss if 'cut-off value' apply to the threshold at which substances are taken into account when considering classification (e.g. additivity formulas), and 'concentration limit' apply to the threshold at which a substance triggers classification (and labelling) e.g. as an impurity in a mixture. Concentration limits can be either 'Generic Concentration Limits' or 'Specific Concentration Limits' according to the provisions of the GHS. UN/SCEGHS/12/INF.12 Annex 1 (Ref 1, and 3).

Ref 3 identifies where in the GHS the terms 'cut-off value(s)' or 'concentration limits' or variations thereon are used. Additionally, Annex 1 of Ref 1 indicates where non-GHS text has been used to explain the context of the term. To avoid confusion, as in the use of terminology above, a 'cut-off value' will always apply unless there are lower 'specific concentration limits', the word generic should never be used in conjunction with the term 'cut-off value' (Ref 1).

Issue 1.2

It would be more appropriate and add clarity to use the terms 'substance(s)' or 'mixture(s)' in some cases instead of 'chemical' (Ref 1 and 3), as the term 'substance(s)' and 'mixture(s)' are already defined (in Chapter 1.2) and contained within the GHS.

Issue 1.3

The term 'endpoint' is not defined in the GHS and could be replaced with 'hazard class' or 'hazard category' where appropriate e.g. endpoint is used in paragraph 3.4.3.3, 3.7.2.3.1, 3.8.2.2.1(c), 4.1.1.7.3 and 4.1.2.8 of the GHS (Ref 1 and 3).

Issue 1.4

Clarification and consistency in the use of the terms 'no data available,' 'not applicable,' and 'not classified' would be useful, as difficulties may be encountered in their interpretation which might have an

impact on classification For example, 'not applicable' and 'not classified' are considered to be essentially equivalent and mean the hazard was not applicable to that chemical, while 'no data' means the substance has not been tested for a hazard class (Ref 2).

Issue 1.5

Paragraph 3.1.3.6.1 provides the formula for acute toxicity estimate (ATE) when all the ingredients are of known toxicity, while paragraph 3.1.3.6.2.3 provides the formulae for the ATE when > 10 % of ingredients are of unknown toxicity. As there is a difference regarding which formula to be used, clarification of the terms 'known' or 'unknown' would be useful (Ref 2).

Issue 1.6

For consistency the more commonly used term 'structure-activity relationship' should replace the occasional use of the term 'structure-property relationship' in the GHS (Ref 3) unless the SCEGHS think that SPR and SAR are essentially equivalent or different terms.

Issue 1.7

The terms 'packaging' and 'packages' are used as synonyms in GHS, though the definitions of both are different in the transport of dangerous goods regulations. The GHS text could be given greater clarity (Ref 3).

2. Issues relating to the classification of mixtures

Issue 2.1

For the application of bridging principles, it should be made clear that the GHS presents a tiered approach which leads to a decision at each tier and that the tiers are not necessarily interchangeable (Ref 2). For example, Figure 3.1.2 presents a tiered approach for using the bridging principles before the additivity formula, but paragraph 3.1.3.5.2 allows the classification of a mixture for acute toxicity to be determined by either the 'diluted approach' or additivity formula (Ref 4).

Issue 2.2

Clarity is required for the conditions necessary for use of the bridging principles. Presently the text indicates that information is required on both the individual ingredients of the mixture and similar tested mixtures, and the interpretation of this paragraph could lead to the use of the diluted approach. Is this the intent when sufficient data are available on individual ingredients only? If not, it is suggested to use the word 'or' so that information is required on the individual ingredients of the mixture or similar tested mixtures, as this would be more logical (Ref 2 and 3).

Issue 2.3

Within bridging principles both 'Interpolation within one toxicity category' and 'Substantial similar mixtures' make use of the descriptors A, B and C but use them in different ways. It is suggested that the use of different letters could provide more clarity (Ref 3).

3. Issues relating to specific hazard classes

Acute toxicity

Issue 3.1

The text in paragraph 3.1.3.2 seems to imply that for the acute toxicity classification of mixtures only the route with the most severe hazard category be used. This possibility is not included, or consistent, with the criteria for substances. Explanatory text in chapter 1.3 and 1.4 is suggested to give clarity. Additionally, clarification of the footnote to paragraph 3.1.3.6.2.1 and its relationship to paragraph 3.1.3.2 may be required (Ref 1, 2 and 3).

Issue 3.2

The text in paragraph 3.1.3.5.2 seems to allow the classification of a mixture for acute toxicity using the 'dilution' (bridging principle) or cATpe approach, which may lead to different classification categories. Further guidance or adjustments to the text of the GHS at some stage should be considered (Ref 3 and 4) as flow diagram 3.1.2 indicates a tiered approach in which bridging principles (such as dilution) are applied before the possibility of using the cATpe approach.

Issue 3.3

Text in paragraph 3.1.3.6.2.1 (a) allows extrapolation between oral, dermal and inhalation acute toxicity estimates when data are lacking for an ingredient in a mixture. This possibility is not included, or consistent, with the criteria for substances. Further guidance or adjustments to the text of the GHS at some stage should be considered (Ref 3).

Issue 3.4

The informal working group may discuss an amendment of the converted acute toxicity point estimates (cATpe) for Cat 1 and 2 at a point approximately 1/10th from the lower end of the range for all routes of exposure, as done for Cat 3 – 5. This will prevent mixtures containing 100% Cat 2 ingredient cATpe being classified as Cat 1 for all routes of exposure. The cATpe for Cat 3 dusts/mist should also be amended to prevent mixtures containing 100% Cat 3 ingredient cATpe being classified as Cat 2. If this is recommended, a subsequent amendment may need to be made to GHS Table 3.1.2 and Note 2 as provided in this INF document (Ref 5).

Skin corrosion/irritation and serious eye damage/eye irritation

Issue 3.5

For skin corrosion/irritation and serious eye damage/eye irritation the flow diagrams 3.2.1 and 3.3.1 respectively address the hierarchy of data use (e.g. human data have precedence over animal data) in steps 1a – c for classification purposes. It is suggested that as this is a general strategy it does not need to be specifically mentioned here (Ref 3).

Issue 3.6

Step 2 in flow diagram 3.2.1 for skin corrosion/irritation may not be needed, as the possibility to use SAR is already mentioned in the criteria text in 3.2.2.2 (Ref 3). (The same is also true for step 2 in flow

diagram 3.3.1 for serious eye damage/eye irritation as the possibility to use SAR is already mentioned in the criteria text in 3.3.2.4).

Issue 3.7

Flow diagram 3.2.1 for skin corrosion/irritation indicates that a negative response in a validated in vitro test(s) for corrosion and irritation requires in vivo testing. The informal working group should consider if the need for in vivo testing should depend on whether the in vitro test can reliably identify non corrosives/irritants or not. Where an in vitro test can reliably identify both corrosives/irritants and non corrosives/non irritants confirmatory testing might not be necessary. Therefore, further guidance or adjustments to the text of the GHS at some stage should be considered (Ref 3 and 4).

Issue 3.8

It is not clear which are the criteria when the additivity principle for corrosivity apply/do not apply, as there seems to be some conflict between paragraphs 3.2.3.3.3/Table 3.2.4 and 3.2.3.3.4. It is suggested that further guidance would be useful (Ref 4).

Issue 3.9

It is not clear in which subcategory a corrosive substance should be classified based on human data, extreme pH, in vitro or SAR results. It is suggested that the figures and related text be reconsidered to avoid inconsistencies (Ref 3).

Issue 3.10

Step 1c in flow diagram 3.3.1 for serious eye damage/eye irritation allows for classification in Category 2 if the substance is a skin irritant. Is there a valid correlation between these effects? (Ref 3)

Issue 3.11

For eye irritation, classification criteria are provided in Table 3.3.1 and 3.3.2 for a 3-animal test. Clarification is required on how to interpret results for classification purposes when the test has not been conducted in 3 animals (Ref 4).

Issue 3.12

For serious eye damage/eye irritation there are differences between tables 3.3.2, 3.3.3, 3.3.4 and 3.3.5 (and text) and flow diagram 3.3.1 that should be reconciled i.e. there is inconsistency within each for the sub-division of Category 2 into Category 2A and 2B. One resolution could be to include categories 1, 2A and 2B in Table 3.3.3, or that only category 2B is included in the table with the explanation that category 2B can only be determined through test data and cannot be calculated. Other resolutions could be considered (Ref 2).

Respiratory or Skin sensitisation

Issue 3.13

To clarify for respiratory or skin sensitisation that the classification should distinguish the route of exposure that may lead to sensitisation of the airways or the skin, respectively. Since, the hazard class includes different types of exposure for the different types of hazard (Ref 3).

Carcinogenicity, Mutagenicity and Reproductive toxicity

Issue 3.14

For carcinogenicity, mutagenicity and reproductive (CMR) toxicity, there is inconsistency regarding the division of category 1 into 1A and 1B throughout the chapters. Specifically, the sections on classification criteria for substances and the labelling elements list categories 1A, 1B and 2, while the tables with cut-off concentrations for mixtures and the flow diagrams only provide for categories 1 and 2. One solution for discussion by the informal working group may be to clarify the cut-off tables and flow diagrams to Categories 1A and 1B (Ref 2).

Issue 3.15

Consider a change to the order of reporting the classification of mixtures for carcinogenicity, mutagenicity and reproductive toxicity (CMR) hazard classes within the GHS. The present order within the GHS starts with classification when data are available for the complete mixture. However, for the CMR hazard classes it is stated under 'classification when data are available for the complete mixture', that classification will be based on test data of the individual ingredients. Therefore, consideration should be given to starting the CMR sections with classification when data are not available for the complete mixture (Ref 3).

Issue 3.16

Developmental toxicity and impaired fertility are not subdivided, and substances toxic to reproduction are classified in one category. In the EU-GHS proposal these two hazard classes are considered separately within each category and the route of exposure is also 'differentiated'. It is suggested that guidance is needed on how to label a substance or mixture which is both a Category 1 and Category 2 reproductive toxin (for an adverse effect on development and fertility respectively). Since portions of both hazard communication elements might be necessary, as the hazard statement includes two hazard classes. It maybe that for this hazard the most severe category will not necessarily take precedence: the required GHS label states 'Suspected of damaging fertility or the unborn child' (Ref 2 and 3). (UN/SCEGHS/14/INF.24 suggests that eight different hazard statements be used to specify the type of effect in the labelling of substances and mixtures classified in category 1 or 2).

Issue 3.17

To allow classification for 'effects on or via lactation' for a substance or mixture that is also classified for developmental and/or impaired fertility by an adjustment to the text or providing further guidance (Ref 3). Paragraph 3.7.1.2 states that "Adverse effects on or via lactation are also included in reproductive toxicity, but for classification purposes are treated separately (see 3.7.2.1)". However, it is noted that this clarity is lacking in paragraph 3.7.2.1.

Issue 3.18

For classification for effects on or via lactation the criteria include that a substance be 'present in potentially toxic levels in breast milk.' However, guidance is lacking on how to determine what would constitute a toxic level. Thus, there may be a difference between how classifiers apply the criteria. While this is a current issue and not unique to GHS classification criteria, further guidance at some stage should be considered (Ref 4).

Specific target organ toxicity single exposure

Issue 3.19

For specific target organ toxicity (STOT) single exposure, clarity is required that for category 3 a separate assessment is required for respiratory irritation and narcotic effects. Additionally, clarity is required that classification in category 3 for respiratory irritation and/or narcotic effects is an independent step from classification in category 1 or 2 (Ref 2 and 3).

Issue 3.20

For paragraph 3.8.3.4.5, clarification is required on whether the 20% concentration limit on a category 3 ingredient(s) for STOT single exposure is additive or non-additive i.e. whether each category 3 ingredient (for each hazard class) should be added together and compared to the 20 % level or whether each ingredient is considered separately (Ref 2).

Issue 3.21

For STOT single exposure, it is not clear how to classify for substances made of isomers having different toxicities. For example, it is not clear whether a substance is classified as Category 2 or not if it contains three isomers, one of which is present at 4 - 5% and shows clear neurotoxic effects. Therefore, consideration should be given as to whether guidance is appropriate to show how to classify a multi-component substance for which data are available for a specific hazard class only on the individual components. Should the mixture rules apply to such substances? Furthermore, this issue is more general than STOT single exposure and could apply to any hazard class (Ref 4).

Aquatic environment

Issue 3.22

To enable classification of both acute aquatic hazards and chronic aquatic hazards, if the criteria for both types of hazards are fulfilled (Ref 3). Paragraph 4.1.2.1 and A.9.2.3.2 report that both hazard sub-classes (i.e. acute and chronic classification categories) are applied independently for the classification of substances.

Issue 3.23

The guidance provided in sub-section A9.3.5.10 on when to use a Water Accommodated Fraction (WAF) for classification of substances which are mixtures of chemicals or isomers lacks clarity. It would be useful to provide a clear formulation stating that the WAF/loading concept for classification be used as a last option (i.e. because the loading concept generally leads to effects above the solubility of the substance). It is not clear what the requirements are relating to the use of the WAF/loading concept, though ideally it is considered that the measured concentration concept should be used as frequently as possible (Ref 4).

Issue 3.24

The guidance provided in sub-section A9.5 to assess the bioaccumulation potential is for substances only. While it is possible to assess bioaccumulation of a mixture (section 4.1.3.5.5) it is not clearly indicated in the GHS. Therefore, consideration should be given to updating the guidance in the GHS text for assessing the bioaccumulation potential of mixtures (Ref 4).

Issue 3.25

Derivation of a multiplying factor (M factor) is contained within Annex 9. Consideration should be given to including information on the philosophy and use of the M factor (Ref 4).

Issue 3.26

Annex 9.3.4 and paragraph 1.3.2.4.9 provide general guidance on application of the weight of evidence. For more than four data, a geometric mean approach is recommended in the guidance. However, for data rich substances, the weight of evidence guidance does not address the use of Species Sensitivity Distribution (SSD) and consideration should be given to including such guidance in the GHS (Ref 4).

4. Other issues

Packaging

Annex 7 of the GHS contains guidance on the labelling and packaging for supply and transport where there are inner and outer packagings. The informal working group should consider if an explanation and guidance on how to proceed would be beneficial, and that an appropriate explanation could be inserted in chapter 1.4 (Ref 1).

Monitoring different implementation timetables among countries

A range of countries are in the process of reviewing and/or revising their chemicals management frameworks, using some or all of the GHS classification and hazard communication elements. In a number of cases, this is more advanced in some sectors more than others and in some countries more than others. As a result, implementation processes and transition arrangements are likely to be highly variable. The informal working group on implementation was asked to comment on whether the monitoring of different implementation timetables among countries was a role for the informal working group. Further discussion within the informal working group on this topic is warranted.

Interpretation of the building block approach

At the tenth session of the SCEGHS it was agreed to establish a correspondence group on the building block approach to examine which elements of the GHS can be used as building blocks and the need for development of guidance material. This correspondence group reported back to the eleventh session of the SCEGHS that the timing was not right to develop guidance material as there were fundamental differences in the interpretation of the building block approach (Ref 6). At the twelfth session of the SCEGHS the expert from France presented an INF paper proposing guidance on the building block approach (Ref 7). There was general support for some but not all of the elements proposed to be building blocks in the GHS (see report of the SCEGHS on its twelfth session: ST/SG/AC.10/C.4/24).

The informal working group generally felt that this issue should not be revisited by the informal working group at the present time, though the issue should be revisited once there is a clear picture about which building blocks different jurisdictions have adopted. Further discussion on this topic amongst the wider membership of the informal working group may be warranted in the future.

Training

Competent authorities in different sectors and different countries will have different approaches to training. Members of the informal working group are encouraged to submit to this group any

developed/draft training courses. It is noted that UNITAR is developing drafts of two GHS training courses (Course 1: General GHS Overview is available as an INF document, while Course 2: Classifying Chemicals According to the GHS is under further development) (Ref 8). The informal working group on implementation discussed whether there was a role to identify similar approaches ('core areas') between sectors/countries, and that these 'core areas' could potentially form the basis of a harmonised approach for some aspects of training. All of the responses from members indicated that this was not a role for the informal working group on implementation.

Arrangements to minimise trade disruption

As countries adopt different implementation schedules it may be that potential barriers to trade become apparent. At the thirteenth session of the SCEGHS the expert from South Africa indicated that a National Committee on Chemicals Safety and Management had been established, and part of the aim of this Committee is to provide early warnings of potential technical barriers to trade and align national activities with international trends to facilitate trade (Ref 9).

The informal working group on implementation discussed the benefit/need in having a group where countries can present and exchange views on impediments to trade. A 'repository group' for such issues could potentially identify significant impediments to trade that may require further action i.e. issues that are common to more than one country implementing the GHS.

The informal working group considered that this was not a role for the group, though to remove barriers to trade a role for the informal working group could be to identify and resolve different interpretations of the GHS.
