

## 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

Sixteenth session  
Geneva, 10-12 (a.m.) December 2008  
Item 7 of the provisional agenda

### PROGRAMME OF WORK FOR THE BIENNIUM 2009-2010

#### Development of criteria for the classification and labelling of substances hazardous to the terrestrial environment

#### Comments on document ST/SG/AC.10/C.4/2008/21

#### Transmitted by the expert from Sweden

### **Introduction**

1. Sweden recognises some benefits in creating a new hazard class for hazardous to the terrestrial environment. However, Sweden cannot give full priority to this issue at this point in time.
2. Therefore, Sweden remains neutral whether this task should be given to the OECD in the next biennium as suggested in document ST/SG/AC.10/C.4/2008/21.

### **Proposal**

3. If there will not be enough support for the suggestions made by the experts from Australia, Austria, France, New Zealand, Slovenia and Spain, Sweden suggest the following alternative approach:
4. A correspondence group could be established and given the task to explore the possibilities to make the current classification and labelling elements for the aquatic environment more general, without changing the classification criteria and tests. This, in order to embrace the environment as a whole by the labelling rather than just the aquatic environment.

5. The following table illustrates what is meant by this proposal:

	<b>Current wording</b>	<b>Alternative wording</b>
Hazard class	Hazardous to the aquatic environment	Hazardous to the environment
Sub-class	Acute (short-term) aquatic hazard	Acute (short-term) environmental hazard
	Long-term aquatic hazard	Long-term environmental hazard
Hazard statements (Acute)	Very toxic to aquatic life	Very toxic to [life in] the environment
	Toxic to aquatic life	Toxic to [life in] the environment
	Harmful to aquatic life	Harmful to [life in] the environment
Hazard statements (Chronic)	Very toxic to aquatic life with long lasting effects	Very toxic to [life in] the environment with long lasting effects
	Toxic to aquatic life with long lasting effects	Toxic to [life in] the environment with long lasting effects
	Harmful to aquatic life with long lasting effects	Harmful to [life in] the environment with long lasting effects
	May cause long lasting harmful effects to aquatic life	May cause long lasting harmful effects to [life in] the environment

6. Making the classification and labelling elements more general could be justified since:

- (a) General phrases as “hazardous to the environment” may be more easily grasped by users (including consumers);
- (b) The vast majority of substances released into the environment will eventually reach the aquatic environment;
- (c) Most substances that are thought to be hazardous to the terrestrial compartment are also hazardous to the aquatic compartment;
- (d) Any system that seeks to identify hazards to the environment must seek to define those effects in terms of wider effects rather than on individuals within a species or population;
- (e) It is widely accepted that the aquatic compartment is both vulnerable, in that it is the final receiving environment for many harmful substances, and the organisms that live there are sensitive;
- (f) For most substances, the majority of data available addresses the aquatic compartment.

7. Keeping the existing criteria and tests based on aquatic organisms etc., but making the classification and labelling elements more general could then be seen either in isolation or as a first step, where if necessary and appropriate, more tests related to the terrestrial compartment could be added in the future, without creating a new hazard class.

-----