

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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OTHER BUSINESS

Publication of sector-specific guidance for the application of the GHS

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

Overview

1. IPIECA submits this informal document in response to Working Paper 10 (ST/SG/AC.10/C.4/2009/10) where the Chairperson and Secretariat present an approach to make sector-specific guidance available through a new webpage at the United Nations Economic Commission for Europe (UNECE) website. This proposal is submitted as a result of discussions at the 17th session of the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (UNSCEGHS or Sub-Committee) where the Sub-Committee examined the issue of ownership of guidance developed by industry for the application of the GHS criteria to specific sectors (ST/SG/AC.10/C.4/34, paragraphs 37 and 38). In this informal paper, IPIECA supports the proposal outlined in Working Paper 10 and discusses its work plan to ensure the validity and transparency of the IPIECA guidance on the application of the GHS to petroleum substances.

Background

2. Various industry sectors are working to ensure their members are familiar with the GHS framework. Outreach efforts have occurred in areas such as the metals and mining, petroleum, and chemicals industries. These industries aim to ensure awareness by members and provide guidance and interpretation relevant to substances and mixtures specific to their industries.

3. The GHS lacks a broadly recognized approach for ensuring that the best information is consistently applied to GHS implementation for certain sectors, for example in situations where an industry has developed guidance on GHS application for its sector. It has been IPIECA's experience that, while the GHS principles are robust, there are complexities and idiosyncrasies associated with their application to specific materials such as petroleum substances.

4. The IPIECA GHS guidance previously submitted to UNSCEGHS (ST/SG/AC.10/C.4/2009/7) suggests arranging petroleum substances logically in groups of "similar" substances (product groups), which facilitates read-across for purposes of consistent classification and minimizes unnecessary testing. The IPIECA guidance also informs the user that there are certain hazardous constituents, which should be considered in classification decisions when there is limited data on the complete substance. Without this

relevant information, the uninformed might view all petroleum substances as conventional mixtures and base all classification decisions solely on component information.

5. The concept of sector guidance is consistent with the aims of the UN Strategic Approach to International Chemicals Management (SAICM). SAICM goals include promoting industry participation and responsibility; establishing a clearing house for information on chemical safety to optimize the use of resources; strengthening the exchange of technical information among the academic, industrial, governmental, and intergovernmental sectors; and other goals related to chemicals management (see SAICM Global Plan of Action).

Role of the UNSCEGHS

6. A stated role of UNSCEGHS “is to make guidance available on the application of the system and the interpretation and use of technical criteria to support consistency of application”¹. It would appear that any beneficial approach to assisting with the implementation of GHS is within the scope of the Sub-Committee.

IPIECA support of the proposal by the chairperson and secretariat

7. IPIECA supports the approach presented in Working Paper 10 to disseminate sector-specific guidance. Under the proposal by the Chairperson and Secretariat, the guidance is disseminated worldwide, industry maintains the content of the guidance, and appropriate disclaimers are in place clearly indicating that the Sub-Committee has not formally endorsed the technical merits of the guidance.

8. Advantages associated with the proposal include: low cost for the UNSCEGHS Secretariat, the utilization of industry expertise, the development of a transparent mechanism to share the guidance with UN member states, and no need for formal technical endorsement of the guidance by the Sub-Committee. Coordinating an informal forum to disseminate sector-specific guidance on the UNECE website will accelerate GHS implementation worldwide and promote consistency in the application of GHS to sectors where guidance is needed.

IPIECA work plan to ensure validity and transparency of IPIECA GHS guidance

9. IPIECA has published the current version of the IPIECA guidance on the application of the GHS criteria to petroleum substances on the IPIECA website at <http://www.ipieca.org/activities/fuels/downloads/ST-SG-AC10-C4-2009-07e.pdf>. IPIECA is currently (1) updating the guidance to incorporate comments provided to IPIECA since the 17th session of the Sub-Committee; (2) implementing an online tracking system to respond to comments received on the guidance; and (3) reformatting the guidance into an IPIECA publication and out of the required paper format for UNSCEGHS meetings.

10. IPIECA will periodically revise the guidance to ensure the guidance reflects current research and scientific developments; is consistent with updated versions of the GHS; and incorporates future comments by competent authorities. As appropriate, IPIECA will update the Sub-Committee on changes to the guidance.

¹ See published mandate of the Sub-Committee of Experts on the GHS:
(http://www.unece.org/trans/danger/publi/ghs/mandate_e.html)