

## 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

6 December 2012

Twenty-fourth session

Geneva, 12 – 14 December 2012

Item 7 of the provisional agenda

Programme of work for the biennium 2013–2014

### **Proposal to maintain the technical correspondence group to align the Annex 9 (section 9.7) and Annex 10 on the Transformation Dissolution protocol to the generic environmental hazard guidance**

**Transmitted by the International Council on Mining and Metals  
(ICMM)**

#### **I. Background**

1. Reference is made to the report of the Sub-Committee of Experts on its 21st session, Annex II, Programme of work for the biennium 2011–2012 (ST/SG/AC.10/C.4/40, Annex II, section 3 (a) (iii)).

#### **II. Introduction**

##### **Long-term hazard assessment for metals and metal compounds**

2. In 2011, at its 21<sup>st</sup> session, the Sub-Committee formed a correspondence group to amend the strategy for metals and metal compounds to include the long-term aquatic assessment. This group has not yet commenced its work and it is proposed that it be mandated to complete the agreed work in the 2013/2014 programme.

3. At the time of its formation the group recognised that the work was feasible, technical in nature and not overly complex given that chronic toxicity data are typically abundantly available for metals and that the Transformation/Dissolution tool (T/Dp Protocol) can be applied in the same way as it is for the acute hazard assessment. Furthermore, no new concepts or principles are needed to implement this update in Annex 9 section A9.7 and Annex 10 as parallel application to the acute environmental hazard assessment can be drawn. It was agreed that a specific *technical correspondence group* would develop the update and guidance accordingly based on industry experience gained in the European Union.

4. It was envisaged that work would be completed for presentation to the 24<sup>th</sup> session of the Sub-Committee. Challenges in adapting the necessary technical concepts have delayed the work but have now been resolved.

5. Indeed the mining and metals industry, in cooperation with the European Chemicals Agency (ECHA), has completed a redrafting of the European Union guidance for the implementation of the third revised edition of the GHS under the Classification, Labelling and Packaging Regulation (CLP Regulation), which includes an updated classification strategy, scheme and guidance for metals and metal compounds. This European Union guidance has now been agreed and published.

6. The representative of ICMM would therefore invite **Sub-Committee experts to renew the mandate of the correspondence group for the working period 2013-2014 so that this important update to Annex 9 section A9.7 and Annex 10 may proceed.**

### III. Proposed scope and organisation of the work

#### Scope

7. The scope and purpose of work would remain as agreed at the 21<sup>st</sup> session. A revised schedule for work is included below.

8. The correspondence group will review Annex 9 section A9.7 on the Classification of Metals and Metal Compounds as well as Annex 10 on the Transformation-Dissolution of Metals and Metal Compounds in Aqueous Media for inclusion under the next revised edition of the GHS. This would ensure the classification strategy, guidance and tools on metals and metal compounds are in line with the long-term aquatic classification scheme introduced by the third revised edition.

9. The main changes that are required to amend the present acute hazard categories towards the long-term aquatic classification endpoint for metals and metal compounds include:

- (a) For Annex 9, section A9.7:
  - (i) extension of the classification strategy (see figure A9.7.1 in Annex I) and guidance for metals, and poorly soluble metal compounds towards the long-term aquatic classification endpoint. Figure IV.5.3.2a, (see Annex II) from the European Union guidance provides an overview of the section to be included in Annex 9, section A9.7;
  - (ii) extension of the effects data interpretation for data rich substances, to the long-term aquatic classification endpoint;
  - (iii) review of the application of M-factors for the acute and long-term aquatic classification endpoint;
  - (iv) potential additional guidance on the demonstration of “rapid removal” from the water column;
- (b) For Annex 10: extension of the Transformation Dissolution protocol (TDp) to lower doses (0.1 and 0.01 at 28 days) - which could include testing and modelling guidance

10. Given the complexity on the interpretation of the use of acute and chronic Transformation Dissolution data and equivalent effects data, it is also suggested to *include some examples* demonstrating the application of section A9.7 of Annex 9 under the GHS scheme.

11. The draft EU proposal on the metals environmental classification system prepared by an ECHA expert group including representatives from the mining and metals sector as

well as the examples developed for this purpose are enclosed in Annex 3 and 4 of this document. These proposals are presently under review.

### **Organisation of the work**

12. The **Sub-Committee is invited** to nominate experts for the revision of Annex 9, section 9.7 and Annex 10 in line with the long-term aquatic classification endpoint as introduced by the third revised edition of the GHS. ICMM will re-contact those who have already expressed an interest.

13. ICMM will provide a proposed draft update of section 9.7 of Annex 9 of the GHS, based on the experience with the EU CLP guidance, for consideration by the correspondence group.

14. The correspondence group will:

- (a) review the proposed draft update of section 9.7 of Annex 9 of the GHS prior to the 25<sup>th</sup> session of the Sub-Committee;
  - (b) review the suggested amendments for Annex 10 of the GHS;
  - (c) review some indicative examples that can be used to illustrate the guidance;
  - (d) organise a written technical discussion round beginning in June 2013 and organise a conference call to discuss and review the suggested changes;
  - (e) Submit a proposal for consideration of the Sub-Committee at its 26<sup>th</sup> session.
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