Assessing the potential development of a global list of classified chemicals

Transmitted by the expert from the United States of America on behalf of the informal correspondence group on implementation issues

Purpose

1. The purpose of this paper is to disseminate the meeting minutes from the working group meeting at the 24th session and present a thought starter to initiate the on-going work of the informal correspondence group on exploring potential issues in the development of a global list of classified chemicals.

Background

2. During the 20th session of the Sub-committee, this working group was charged with considering the following three items (Terms of Reference: ST/SG/AC.10/C.4/2010/20 (paragraph 12)):

   (a) Establishing a set of principles to guide the development of a global list of GHS classified chemicals;

   (b) What chemicals should be the focus of work for classification according to the GHS, considering those chemicals possessing hazards of serious health, physical and/or environmental concern; those most commonly used and transported worldwide; which end-points should be covered; and

   (c) The interim steps such as the development of a proposal on functionalities that would increase the efficacy of the OECD eChemPortal regarding the current GHS classification of chemicals in existing lists.

3. At the 24th session, at the end of the 2011-2012 biennium, the Sub-Committee agreed to guiding principles that frame the scope for further development of a global list. The guiding principles are listed in Annex III of the report of the Sub-Committee on its 24th session (Document ST/SG/AC.10/C.4/48).
4. The Sub-Committee also agreed to the proposed terms of reference for the work of the informal correspondence working group during the biennium 2013-2014 contained in INF.39.

5. The pilot program should explore how the guiding principles can be applied as well as what resources would be necessary if a global list would be developed. Below is the agreed upon terms of reference for the next biennium:

(a) Develop a strategy for choosing chemicals for the pilot program, including considering whether any of the following factors should be used in the selection: extent of use, volume of production, amount and quality of data, conflicting classifications in existing lists, and any other relevant considerations

(b) Choose a small number of chemicals for the pilot program, and seek consensus on harmonized classifications for each.

(c) Evaluate this exercise in light of the guiding principles.

6. The proposal includes exploring two approaches to:

(a) Compare classification of existing lists and examine how and why they may differ;

(b) Gather hazard information on selected chemicals and perform a hazard analysis and determine the hazard classification.

**Thought Starter for the global list working group meeting**

7. To initiate the pilot program the working group needs to first define the process for evaluating the chemicals. The second step would be the selection of the chemicals.

8. The process of evaluating chemicals should be designed to provide insight into the level of effort needed to undertake the development of a Global Classification List. It will also allow the Sub-Committee to define the processes that have the best chance for success. It is expected that the pilot program will provide insight into the following types of issues:

(a) What are the various skill sets needed to classify chemicals against the Physical, Health and Environmental GHS Hazards criteria?

(b) What process(es) should be used for evaluating data and making recommendations on a classification? Should classification be done by:

(i) GHS Sub-Committee delegates; or

(ii) Experts at existing regulatory agencies; or

(iii) Experts at internationally recognized focal points for technical work; or

(iv) Some combination of the above options.

(c) What process will be used to “finalize” a proposed classification?

(d) What processes will be needed to update a classification when new data becomes available?

(e) How will the Sub-Committee incorporate stakeholder input?

(f) How will each approach encompass the guiding principles? For example, is the data or explanation of the classification available to the public?

9. To initiate the discussion on the selection of chemicals, a draft template has been developed and is contained in Annex 2 of this informal paper.
Annex 1

The bullets below encompass the meeting minutes from the working group’s discussion during the 24th session and address the potential issues related to the development of a global list of classified chemicals:

1. The informal group met on Thursday December 13th and discussed the final edits to the guiding principles and the path forward for developing the pilot program. The pilot program is a way to test the guiding principles and explore the potential issues that might arise, if the Sub-committee decides to pursue the development of a global list of classified chemicals.

2. There appeared to be two paths that many experts thought would be worthwhile to pursue (see Annex 1 for diagram):
   (a) The first approach is to start from the available data and develop classifications
   (b) The second approach is to start from the current lists and compare classifications

3. Over the past several years, OECD has run several pilot exercises. One pilot exercise which would use tools (e.g. eChemPortal participating databases) to select chemicals with diverging (self-)classifications and data available from assessments submitted to OECD Cooperative Chemicals Assessment Programme to make an informal proposal for draft hazard classifications. OECD will share their experiences on this exercise and why there were differences in the classification.

4. IMO also has a list of classifications for approximately 1,000 chemicals which are peer reviewed. IMO publishes a circular every year, which follows the GHS guidelines, but also includes the IMO classification ratings. Their mandate is to use band width of categories and does not reveal the supporting data.

5. It was expressed that chemical expert review of substance health data can be difficult process due to the varying scientific points of view.

6. In light of this, several member countries agreed that it might be best to start with substances that have sufficient information, widely used but not restricted use and that are not controversial (such as issues with analytical methods or competing studies). It was recommended that a template should be prepared outlining the basic information available and the rationale for including the chemical for the pilot program.

7. It was recommended that we try not to start from scratch but use, where possible, other programs that may have already started this type of work such HPV program under OECD. While the information may need to be updated it would be a starting place.

8. The next step is to develop a template for the recommendation for chemicals that should be considered for the pilot (see Annex 2 for a draft template).
Annex 2

**Draft template for chemical selection for chemical list pilot program**

<table>
<thead>
<tr>
<th>Chemical Name</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Identifier</td>
<td></td>
</tr>
<tr>
<td>UN</td>
<td></td>
</tr>
<tr>
<td>CAS</td>
<td></td>
</tr>
<tr>
<td>Impurities</td>
<td></td>
</tr>
<tr>
<td>HPV (Y/N)</td>
<td></td>
</tr>
<tr>
<td>Pesticide (Y/N)</td>
<td></td>
</tr>
<tr>
<td>Data availability: Data Rich/Data Poor</td>
<td></td>
</tr>
<tr>
<td>Is this chemical already on a list (Y/N)</td>
<td></td>
</tr>
<tr>
<td>What lists?</td>
<td></td>
</tr>
<tr>
<td>Existing List Classification:</td>
<td></td>
</tr>
<tr>
<td>□ Health</td>
<td></td>
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<tr>
<td>□ Physical</td>
<td></td>
</tr>
<tr>
<td>□ Environmental</td>
<td></td>
</tr>
<tr>
<td>Reason for selecting chemical</td>
<td></td>
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</tbody>
</table>