
Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labeling of Chemicals

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Sub-Committee of Experts on the Globally Harmonized
System of Classification and Labeling of Chemicals

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Item 5 (a) of the provisional agenda

**Implementation of the GHS: development of a list of
chemicals classified in accordance with the GHS**

Classification of chemical products in Canada

Transmitted by the expert from Canada

1. Canada has a process for the protection of confidential business information (CBI) which has required, since the late 1980's, that companies and employers provide copies of their safety data sheets to the government for review. This process affects only those companies and employers who wish to protect CBI, which currently includes approximately 1400 products on the Canadian market.
2. The review conducted by the government includes the determination of the appropriate classification of the product, based on the product composition submitted by the company or employer. In addition, the government reviews the information on the Safety Data Sheet (SDS) in detail, to confirm that all regulatory requirements have been met.
3. Canada therefore has experience in the classification of chemical products which extends back a number of years, and which may be useful information for consideration by the working group on the Global List of Classified Chemicals, as it assesses the methodology by which classifications will be determined for the purpose of the global list.
4. In Canada's experience, approximately 13 days of full time work by specialists experienced in the field of toxicology and regulatory affairs are required to review one product. This is an average as some products have few ingredients with minimal available information, whereas others may have many ingredients with volumes of available information. The average time to review each ingredient within the product would be less, but is not a value that we are easily able to quantify giving our current tools.
5. These 13 days of work are spread out over a longer period of time, during which the following steps are completed: 1) the request is registered; 2) the literature is searched for any available information on each of the product's ingredients that are present above threshold concentrations; 3) the literature is reviewed by a scientist and recorded in a database; 4) a classification is determined for the product, and any other information that must appear on the SDS is identified (this is referred to as the 'evaluation' phase); 5) the findings of the evaluation phase are reviewed, first by a senior scientist and then by a peer of the senior scientist; 6) the findings are summarised in a consultation document which is issued to the company or employer having made the request; and 7) a final decision is issued on the state of compliance of the submitted SDS. It is clear that only steps 2 – 5 apply directly to the work that is being undertaken by the Working Group.

6. On average, Canada processes between 300 and 400 reviews of CBI submissions per year. Canada has completed literature searches for 922 chemicals in the last 18 months. However, it must be noted that our work to date has been focussed on the assessment of products in accordance with the regulations as they existed prior to the implementation of the GHS.

7. In January of 2016, Canada will begin its classification of products in accordance with the GHS building blocks adopted in Canada's *Hazardous Products Regulations*. Canada expects that the initial process of classifying ingredients and products in accordance with these requirements will require more time than our current average as our experts gain experience with the new classification criteria, but Canada also anticipates a return to this average, or less, over time.

8. Canada invites interested parties to communicate with us directly to learn more about our classification process.
