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

24 November 2017

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

#### Thirty-fourth session

Geneva, 6-8 December 2017

Item 2 (h) of the provisional agenda

#### Classification criteria and related hazard communication: Other issues

## Addressing risk management in the GHS

### Transmitted by the expert from Australia

### Introduction

1. The report of the thirty-third session of the Sub-Committee (ST/SG/AC.10/C.4/66) notes the concerns of one expert about the introduction of risk assessment considerations into the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) and that further discussions in regard to addressing risk management in the GHS would be welcomed. This paper provides information on relevant matters for consideration by the Sub-Committee.

### Background

2. The purpose of the GHS is to achieve international harmonization of the approach to the classification and labelling of chemicals, to support national programs that ensure safe use, transport and disposal (Chapter 1, paragraph 1.1.1.3). To realize this, its scope covers harmonized criteria for classifying substances and mixtures according to their health, environment and physical hazards, and harmonized hazard communication elements, including requirements for labelling and safety data sheets (Chapter 1, paragraph 1.1.2.1).

3. The harmonization of risk assessment procedures or risk management decisions is excluded from the scope of the GHS (Chapter 1, paragraph 1.1.2.6.1). In accordance with this, the publication of guidance on risk assessment and management in the GHS has been limited. For example, the GHS text in regard to consumer labelling states that competent authorities may authorize consumer labelling systems that provide information based on risk (Chapter 1, paragraph 1.4.10.5.5.2).

### Guidance on risk management

4. Work on addressing dust explosion hazards has highlighted the complexities that exist when a hazard is dependent on both intrinsic and extrinsic properties. To overcome these difficulties, the annex agreed by the Sub-Committee at its thirty-third session includes guidance on risk management (ST/SG/AC.10/C.4/2017/3, paragraphs A11.2.1.1 and A11.2.1.2).

5. The informal working group had noted that the annex would address risk management options, and provide guidance on harmonized hazard communication for competent authorities who might wish to require it (ST/SG/AC.10/C.4/60, paragraph 14). The annex does not advise harmonization of risk assessment or management of dust

explosion hazards. Nonetheless, the inclusion prompts discussion on the broader role of guidance on risk management in the GHS.

6. The new annex demonstrates that the inclusion of guidance on risk management in the GHS can provide benefit. Including the guidance in the GHS alerts competent authorities and classifiers to potential risk, and the factors that may contribute to this risk.

7. While risk management guidance can inform risk assessment and management activities, it remains critical that it is clear that competent authorities have responsibility of risk management arrangements in their economy. Ambiguity in the purpose of guidance on risk management may cause confusion in regard to the role of competent authorities, and the responsibilities of those who must manage risks.

8. Information provided by some members of the Sub-Committee prior to this session indicated they hold broad concerns about how risk management information could be usefully conveyed in the GHS, given differing risk management terminology, approaches to managing risks and regulatory frameworks.

9. It is important that the guidance in the new annex and any future guidance on risk management is balanced so that it assists competent authorities managing programs to ensure safe use, transport and disposal of substances, without undermining the role of competent authorities in setting risk assessment and risk management frameworks. This is consistent with the purpose and recognised boundaries of the GHS.

## **Proposal**

10. The expert from Australia invites the Sub-Committee to consider the following approach to providing clear information on the purpose of guidance on risk management included in the GHS. As a starting point for discussion, the information could include:

- (a) Guiding principles for the inclusion of guidance on risk management in the GHS, as set forth in Annex 1 to this paper;
- (b) Agreed terminology for use in guidance on risk management in the GHS, to ensure consistent interpretation in adopting economies;
- (c) Amendment to paragraph 1.1.2.6 of the GHS, to reflect that while harmonization of risk assessment procedures and risk management decisions is beyond the scope of the GHS, limited guidance on risk management may be included where it may improve understanding of the influence of external factors on specific hazards.

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## Annex

### **Proposed guiding principles for the inclusion of guidance on risk management in the GHS**

- (a) Guidance on risk management may be included in the annexes to the GHS and other supplementary documentation where it assists competent authorities to ensure safe use, transport and disposal of substances;
- (b) The terminology used in guidance on risk management will be unambiguous and consistent with adopting economies as far as possible to ensure an equivalent understanding across competent authorities;
- (c) Guidance on risk management will only be included in the GHS to the extent necessary to realise the first principle, so as to not create a reliance on the guidance material and discourage local competent authorities from considering local conditions;
- (d) Guidance on risk management will be accompanied with recognition, such as a note, that harmonisation of risk assessment procedures and risk management decisions is not a goal of the GHS, and these activities are matters for competent authorities<sup>1</sup>.

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<sup>1</sup> Generally, this should be a note preceding any text that provides guidance on risk management, stating: *“Information on risk management is provided in the GHS for guidance only. Competent authorities are best placed to determine the most appropriate risk assessment procedures and risk management measures.”*