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

Thirty-sixth session
Geneva, 5-7 December 2018
Item 3 (h) of the provisional agenda
Classification criteria and related hazard communication:
other issues

Addressing risk management in the GHS

Transmitted by the experts from Australia and the United States of America

Introduction

1. At the thirty-fifth session the expert from Australia presented a document outlining an approach to the inclusion of risk management information in the GHS (informal document INF.22, thirty-fifth session). The document presented an alternative approach to that presented at the thirty-fourth session (informal document INF.14, thirty-fourth session).

2. At the thirty-fifth session, the expert from the United States of America suggested that, rather than repeating the note proposed in paragraph 8 (b) of informal document INF.22 wherever risk management information appears in the GHS, it be included in paragraph 1.1.2.6.1, Other scope limitations. The expert from the United States also suggested minor revisions to the proposed language.

3. At the conclusion of the discussions at the thirty-fifth session, the experts from Australia and the United States were invited to present a proposal for decision.

* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, para. 98, and ST/SG/AC.10/44, para. 14).
Proposal

4. Consistent with the proposal from the expert from the United States at the thirty-fifth session, the text from informal document INF.22 is inserted into paragraph 1.1.2.6.1 as follows, with new text in **bold**.

“The GHS is not intended to harmonise risk assessment procedures or risk management decisions (such as establishment of a permissible exposure limit for employee exposure), which generally require some risk assessment in addition to hazard classification. **However, information on risk management is occasionally provided in the GHS on a case-by-case basis for guidance purposes. Competent authorities are best placed to determine in local law and standards the appropriate risk assessment procedures and risk management measures.** In addition, chemical inventory requirements in various countries are not related to the GHS.”

5. The sub-committee is invited to agree to the proposal in paragraph 4 above.