

**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**

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Item 4 (a) of the provisional agenda

Implementation of the GHS – Implementation issues

**Survey on existing classification lists of hazardous/dangerous
chemicals**

Transmitted by CropLife International

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Confidentiality

Please indicate if you wish your submission kept confidential

Yes No

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Survey for existing international classification lists of chemicals

Sections A to C (questions 1 to 16)

Not applicable. Questions 1-16 are for government agencies only. Industry associations should fill in the questions from 17 onwards.

D. Area: For the future discussions on classification lists

Question 17: Would you find an international list of chemicals classified in terms of the GHS useful?

We are currently open minded on this issue. The current situation of a number of different lists with different status is highly confusing to industry.

Question 18: What do you see as the primary group of users of an international classification list (manufacturer's guidance or for harmonisation only)?

The main advantage of an international classification list would be to facilitate harmonisation.

Question 19: Who should develop and maintain such an international list?

We don't have a view on a specific organisation. A suitable organisation should be adequately resourced and open for all to participate, it's processes should be politically neutral, scientifically sound, transparent and open for all interested parties to participate.

Question 20: Would it be possible to make a classification list of one country/industry available for all countries?

Not applicable as we do not maintain our own classification lists.

Question 21: Would you be willing to share your list with the UNSCEGHS?

Not applicable as we do not maintain our own classification lists.

Question 22: If there was an international classification list of chemicals, should it be a binding or non-binding classification list of chemicals?

We are currently open minded on this issue. It would depend on those being consensus on the list entries.

Question 23: If there was an international classification list of chemicals, should it be for substances only or should it also include mixtures?

Given the huge number of mixtures, we believe that it would be totally impractical to produce an international classification list for mixtures. Additionally, as many mixtures are specific to a single manufacturer, we see no benefit in trying to compile an international classification list for mixtures.

Question 24: If there was an international classification list of hazardous chemicals, what would be the priorities on which chemicals to be added to that list (Rotterdam and/or Stockholm and/or UN list of chemicals, pesticides)?

Any priority should be driven by the perceived risk posed by the chemical and not by political considerations.