

## 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 (d) of the provisional agenda

Hazard communication: Other issues

### **Status update on and proposal for the on-going work of the informal correspondence group on the alignment of Annex 9 (section 9.7) and Annex 10 (on metals and metal compounds) to the criteria in Chapter 4.1 and the generic environmental hazard guidance**

**Transmitted by the International Council on Mining and Metals (ICMM) on behalf of the correspondence group**

#### **Background**

1. In 2018, at its thirty-sixth session, the Sub-Committee reconfirmed the mandate of a correspondence group to amend the strategy for metals and metal compounds to include the long-term aquatic assessment (ref: informal document INF.25 (24<sup>th</sup> session)). The group convened in June and November 2020 and has been making good progress, and, subject to the work item being approved to continue in the next Biennium, will continue its work towards proposing amendments to the GHS to the Sub-Committee for consideration at its next session.

#### **Work plan**

2. The correspondence group is reviewing presently Annex 9 section A9.7 (Environmental Classification of metals and metal compounds) as well as Annex 10 (Transformation-Dissolution of metals and metal compounds in aqueous media) for inclusion under the tenth revised edition of the GHS. This would ensure the classification strategy, guidance and tools on metals and metal compounds are in line with the long-term aquatic classification scheme introduced by the third revised edition.

3. The main changes that are being considered to amend the present acute hazard categories towards the long-term aquatic classification endpoint for metals and metal compounds include:

- (a) For Annex 9, section A9.7:
  - (i) extension of the classification strategy and guidance for metals, and poorly soluble metal compounds towards the long-term aquatic classification endpoint;
  - (ii) extension of the effects data interpretation for data rich substances, to the long-term aquatic classification endpoint;
  - (iii) review of the application of M-factors for the acute and long-term aquatic classification endpoint;

- (b) For Annex 10:  
extension of the Transformation/Dissolution protocol (TDp) to lower doses (0.1 and 0.01 at 28 days) - which could include testing and modelling guidance.

## Status of the work

4. At its thirty-sixth session, the Sub-Committee agreed to keep this item on the 2019-2020 Biennium work programme. Since the thirty-sixth session, ICMM proceeded to review the comments originally received from the correspondence group by integrating the changes that had been agreed and by identifying remaining issues in Annexes 9 and 10 of the eighth edition of the GHS text.
5. ICMM reached out to the correspondence group members to establish their on-going interest in progressing the work and to invite them to review the proposed amendments and discuss elements that remained to be addressed. Several members confirmed their on-going interest in the work. A conference call was held in early June 2020 to discuss the review process and the timeline and gather initial comments.
6. In July 2020, members of the correspondence group provided extensive written comments on the various sections of the Annexes, where amendments had been put forward. ICMM reviewed the detailed feedback during the summer. In October 2020, the correspondence group was invited to consider revised amendments to the two Annexes, reflecting the comments received. A second call of the correspondence group was held in November 2020.
7. During this call, it was established that most of the proposed changes seemed to be acceptable, in principle, to participants. Should the Sub-Committee agree for the work to continue, members were invited to submit further comments in writing in January 2021, to ensure the proposed revised wording is in line with the GHS text and that all open issues have been identified.
8. Based on the comments received to date, a limited number of open issues has been identified so far, which the correspondence group agreed to require further discussion. These include considering:
- (a) The primary role of the screening test for metal compounds (with reference to A9.7.2.2.3, A9.7.5.3, A10.2.2.1 and A10.5.3.1.2);
  - (b) Linked to the conclusions of the discussions outlined in 8. (a) of this document, the approach to be followed when it comes to a default classification category (with reference to A 9.7.5) for chronic 4 classifications;
  - (c) Whether the text in Annex 9.7 is sufficiently clear when it comes to the correlation between the Transformation/Dissolution and toxicity at varying pH (with reference to A9.7.2.1.2.1 and A9.7.2.2.4);
  - (d) Whether there is a need to improve the consistency in the way Ecotoxicity Reference Values are defined throughout the Annexes.
9. During discussions of the correspondence group, some issues of further interest to the group were identified. These are out of scope of the current work item. Subject to further discussions, these could be brought forward for the consideration of the Sub-Committee as a potential new work item in the future.
10. The correspondence group is keen to complete its work and requests for the work item to continue in the Biennium 2021-2022 work programme. Members hope to have a set of recommendations and proposed amendments to the GHS ready to be submitted, as an informal paper, to the Sub-Committee for consideration at its next session.

**Requested action**

11. The Sub-Committee is invited to note the progress made to amend the annexes.
  12. The correspondence group proposes for the next biennium to carry over the current programme of work, outlined in paragraph 3 of this document.
  13. The Sub-Committee is invited to agree the proposed programme of work for the informal correspondence group for the 2021-2022 biennium as outlined in paragraph 12 of this document, and to nominate representatives on the correspondence group, should they wish to do so.
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