

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**

6 December 2021

Forty-first session

Geneva, 8-10 December 2021

Item 4 (a) of the provisional agenda

Development of guidance on the application of GHS criteria:

Alignment of Annex 9 (section A9.7) and Annex 10 with the criteria in Chapter 4.1

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 align the long-term aquatic assessment with the third revised edition of the GHS (ref: informal document INF.25 (24th session)). Following the work item being approved to continue in the 2021-2022 Biennium, the group has carried on with its work towards proposing amendments to the GHS to the Sub-Committee for consideration at a forthcoming 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 basis for 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 mg/L at 28 days) - which could include testing and modelling guidance.

Status of the work

4. At its thirty-ninth session, the Sub-Committee agreed to keep this item on the 2021-2022 Biennium work programme. Since the thirty-ninth session, the group was invited to review and provide additional comments to the set of documents developed by ICMM to capture and inform the group's progress on two occasions. ICMM proceeded to review the comments 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 GHS text.

5. During the November 2020 call, it was established that most of the proposed changes seemed to be acceptable, in principle, to participants. Following the Sub-Committee agreement 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.

6. In January 2021, 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 spring. In May 2021, the correspondence group was invited to consider further revised amendments to the two Annexes, reflecting the comments received. A call of the correspondence group was held in June 2021.

7. During the June 2021 call, participants indicated their belief that all remaining open issues had been identified. 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 7. (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.

8. In June 2021, the group discussed open issues 7.(a) and 7.(b) in more details. Ways forward were identified, and alternative text will be developed to reflect the feedback received for further consideration. Open issues 7.(c) and 7.(d) will be explored at the next call of the group, to be held after the 41st Sub-Committee meeting.

9. In earlier 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 hopes 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.
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