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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**

**Sub-Committee of Experts on the
Transport of Dangerous Goods**
(Twenty-first session, 1-10 July 2002
agenda item 11 (a))

**GLOBAL HARMONIZATION OF SYSTEMS OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

Classification of substances hazardous for the aquatic environment

Transmitted by the expert from the Netherlands

Background

In December 2001 the Sub-Committee discussed documents from the United Kingdom (ST/SG/AC.10/C.3/2001/39) and Belgium (ST/SG/AC.10/C.3/2001/15) concerning environmentally hazardous substances. During this discussion several experts requested that the question of applying criteria to substances already classified as hazardous should also be discussed. The Chairman said that it would be preferable to come back to this question at the next session on the basis of written proposals (see paragraphs 105 and 106 of report ST/SG/AC.10/C.3/40).

Introduction

The question to be answered is to which substances and mixtures the criteria for hazards to the aquatic environment (as given in ST/SG/AC.10/C.3/40/Add.2, Annex 2) should be applicable.

In view of the Netherlands an important aspect to be taken into account in taking a decision should be the goal of the GHS: a globally harmonised *system* of hazard classification and labelling. This means that the implementation of the GHS should not be restricted to just implementing some GHS classification criteria, the implementation should also include the application of these criteria and the labelling requirements related to these criteria.

In the introduction of the GHS (ST/SG/AC.10/C.4/2001/20), in particular Chapter 1.1 (purpose, scope and application) it is clearly indicated that the harmonised criteria are intended to apply to all substances and mixtures. Concerning the application of the GHS for transport it is stated in paragraph 23 that: “For transport, it is expected that the application of the GHS will be similar to application of current transport requirements. Containers of dangerous goods will be marked with pictograms that address acute toxicity, physical hazards and *environmental hazards*.” In paragraph 28 it is stated that: “As long as the hazards covered by a sector or system are covered consistently with the GHS criteria and requirements, it will be considered appropriate implementation of the GHS”.

Taking into account the introduction of the GHS, the Netherlands are of the opinion that in order to comply with the GHS:

- the criteria for hazards to the aquatic environment should be applicable to all substances and mixtures;
- substances and mixtures classified as hazardous to the aquatic environment should be labelled with the GHS label for this hazard.

Options for implementing the GHS for hazards to the aquatic environment

In view of the Netherlands there are two options to implement the GHS for hazards to the aquatic environment into the UN recommendations:

- 1 introduce a new class for substances and mixtures hazardous to the aquatic environment e.g. Class 9.1: aquatic pollutants. This option is used by New Zealand (see document ST/SG/AC.10/C.4/2001/19);
- 2 introduce a system similar to the existing IMDG Code system for marine pollutants.

Which option is preferable should be discussed by the Sub-Committee.

Proposal

The Sub-Committee is invited to discuss the two options to implement the GHS for hazards to the aquatic environment and decide as appropriate.
