

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
Seventeenth session,
Geneva, 29 June – 1 July 2009
Item 2(a), 2(b), 2(e), 3, 5, 6(a) and 8 of the provisional agenda

AUSTRALIAN POSITION ON MEETING PAPERS

Transmitted by the expert from Australia

Background

Australia sends its apologies at not being able to attend the Sub-Committee at this session. With the agreement of the Chair, this INF paper provides a summary of Australia's position on the following papers for the seventeenth session, in agenda item order:

Item No (provisional agenda): 2 (a)
Document number: ST/SG/AC.10/C.4/2009/6
Title: Development of classification criteria for combustible dusts
Submitted by: USA
Australian position: Australia supports the establishment of a correspondence group to determine whether criteria should be developed for combustible dusts.

Item No (provisional agenda): 2(b)
Document number: ST/SG/AC.10/C.4/2009/5
Title: Classification of poorly soluble particles for STOT following repeated exposure
Submitted by: International Council on Mining and Metals (ICMM) and European Chemical Industry Council (CEFIC)
Australian position: Australia supports the need for the review of scientific evidence but this should be referred to the International Programme on Chemical Safety, World Health Organization, since it is a matter relating to the requirement of animal data to conduct human health risk assessment. Australia does not support amendment of Chapter 3.9.2 since it would be premature until the debate over the relevance of lung overload in animals to humans is resolved.

Item No (provisional agenda): 2(e)
Document number: ST/SG/AC.10/C.4/2009/2
Title: Units of concentration of ingredients in mixtures
Submitted by: European Industrial Gas Association (EIGA)
Australian position: Australia is in agreement that there should be a consistent approach used in the GHS (and the transport model regulations) for the units of measurement that are used to specify the concentration of the ingredients in gas mixtures. Australia agrees to the proposal by EIGA.

Item No (provisional agenda): 3
Document number: ST/SG/AC.10/C.4/2009/1
Title: Hazard communication issues – Pictograms for gases under pressure
Submitted by: European Industrial Gas Association (EIGA)
Australian position: Australia does NOT agree to the proposal. For the workplace, the transport pictograms must be supplemented by the GHS ‘gas cylinder’ pictogram, except where the Division 2.2 class label is present on the package, i.e. the Class 2.2 class label is acceptable for the workplace in lieu of the GHS pictogram but not for flammable gases (Class 2.1) and Toxic gases (Class 2.3). Since the cylinder is the outer package for both transport and the workplace, industry will need to comply with both labelling requirements and will need to add the GHS gas cylinder pictogram to the cylinder pictogram in addition to the transport class labels (except where it is a dangerous goods Class 2.2 gas).

Item No (provisional agenda): 5
Document number: ST/SG/AC.10/C.4/2009/7
Title: Application of GHS criteria to substances of unknown or variable composition, complex reaction products, or biological materials (UVCB), in specific petroleum substances
Submitted by: International Petroleum Industry Environmental Conservation Association (IPIECA)
Australian position: Australia congratulates IPIECA on the work to develop guidance material for classification of petroleum substances but regrets that it cannot agree to endorsement by the sub-committee. Australia recommends that IPIECA subject their guidance material to independent expert review and revises the guidance material accordingly. If promulgated by IPIECA and affiliated industry organisations, Australia considers that this guidance material would be most useful for Australian industry.

Item No (provisional agenda): 6 (a)
Document number: ST/SG/AC.10/C.4/2009/4
Title: Consideration of issues relevant to Material Safety Data Sheets (MSDSs) by IMO Sub-Committee on Bulk, Liquids and Gases at its thirteenth session (BLG 13)
Submitted by: International Maritime Organisation (IMO)
Australia position: Australia does not want to see safety data sheets required for maritime transport to differ from those required for use in other sectors. A working group between IMO and the sub-committee should be established to incorporate maritime-specific hazard information in the agreed GHS safety data sheet.

Item No (provisional agenda): 8
Document number: ST/SG/AC.10/C.4/2009/3
Title: Ongoing work on the safety of nanomaterials
Submitted by: France
Australia position: Australia thanks France for the update on the international effort to understand and define the hazards of nanomaterials. Australia is contributing significantly to this international effort through other fora established for the purpose. Australia does not consider the GHS sub-committee should be a forum for discussion of nanomaterials until it is clear that there may be a need for a new classification category to deal with any of these materials.
