

**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals**

25 June 2018

**Sub-Committee of Experts on the Globally Harmonized
System of Classification and Labelling of Chemicals**

Thirty-fifth session

Geneva, 4-6 July 2018

Item 3 (h) of the provisional agenda

**Classification criteria and related hazard communication
other issues**

Addressing risk management in the GHS

Transmitted by the expert from Australia

Introduction

1. At the thirty-fourth session the expert from Australia presented a paper outlining a suggested approach to the inclusion of risk management information in the GHS (informal document INF.14, 34th session).
2. When introducing the paper, the expert from Australia clarified that it was not the intention of the paper to expand the scope of the GHS to include risk management information on a general basis. Rather, the paper was intended to facilitate a discussion about matters the sub-committee could consider if risk management information was to be included while respecting the current scope and purpose of the GHS, and the role of competent authorities with respect to risk management.
3. Interventions at the thirty-fourth session sought clarification of a number of issues, including whether it was intended that the guiding principles in Annex 1 to informal document INF.14, 34th session were to be published as text in the GHS itself or provide another form of guidance to be used by the sub-committee to inform its decisions.
4. Other experts expressed views in the plenary and in written comments that any decision on the inclusion of risk management information should be made by the sub-committee on a case by case basis, rather than as a result of a set of criteria.
5. The expert from Australia also thanks those who provided further information on risk management terminology in their economies.

Proposal

6. The expert from Australia agrees that the sub-committee will always need to consider each case on its own merits the particular circumstances when making a decision about inclusion of risk management information.
7. Given the current work of the sub-committee and taking into account the preferences expressed by other experts, the expert from Australia proposes an alternative approach.
8. The views of the sub-committee are sought on the following approach: -
 - (a) Risk management information may occasionally be include in the GHS, on a case- by case basis where the sub-committee decides that it is justified.
 - (b) Where risk management information is included in the GHS, it is preceded by a note, based on the following text:

“Information on risk management is occasionally provided in the GHS for guidance purposes. Competent authorities are best placed to determine in local law and standards the appropriate risk assessment procedures and risk management measures.”
