

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**

18 June 2020

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Geneva, 8-10 July 2020

Item 5 of the provisional agenda

Development of guidance on the application of GHS criteria

Update 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 36th 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: INF.25, GHS 24th session). The group convened in June 2020 and is making good progress, working 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 next 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 36th session, the Sub-Committee agreed to keep this item on the 2019-2020 Biennium work programme. Since the 36th 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. During discussions of the correspondence group in June 2020, 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 for the next biennium.

7. The group hopes to have a final set of recommendations and proposed amendments to the GHS ready to be submitted to the Sub-Committee for consideration at its next session.

Requested action

8. The Sub-Committee is invited to note the progress made to amend the annexes and nominate representatives on the correspondence group, should they wish to do so.
