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 **13 October 2010**

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Item 4 (a) of the provisional agenda
Implementation of the GHS – Implementation issues

Updated consolidated comments on the survey for existing international classification lists of chemicals

Transmitted by the expert from Australia

Introduction

This document contains consolidated comments from GHS Sub-Committee experts regarding the survey of international classification lists of hazardous chemicals, updated with additional responses received from member countries and observer experts of both the UNSCEGHS and UNSCETDG. The survey was circulated on 3 February 2010 and again on 23 July 2010 with responses requested back by Friday 26th August 2010. All the responses received are listed in the annex to this document.

The questions in the list of consolidated comments are as per in the original survey and the responses from each country/international organisation are listed in the alphabetical order in the next column.

Please recycle

Annex

Part I:
Submissions received

Country/Organiz.	*Name*	*Organisation*	*Contact information*	*Email*	*Confidential*
ACI (USA)	Richard Sedlak	American Cleaning Institute℠ (formerly The Soap and Detergent Association)	1331 L Street, NW, Suite 650 Washington, DC 20005	rsedlak (AT) cleaninginstitute.org	No
AISE	Wendy Cameron	A.I.S.E. (International Association for Soaps, Detergents and Maintenance Products)	Avenue Herrmann Debroux 15A Bussels 1160 Belgium	wendy.cameron (at) aise.eu	No
Argentina	Arnaldo J. Caldirola	Ministry of Labor, Employment and Social Security	Av. Leandro N. Alem 650, Piso 2° - C.A.B.A - Argentina	acaldiro(**AT)**trabajo.gov.ar	No
Australia	Drew Wagner	Safe Work Australia	220 Northbourne Avenue, Braddon, ACT 2612 Australia	drew.wagner(**AT)**safeworkaustralia.gov.au	No
EU	Uta Jensen-Korte	European Commission, DG ENTR and DG ENV	European Commission DG ENTR Av. d'Auderghem 45, B-1049 Brussels Belgium	uta.jensen-korte(**AT)**ec.europa.eu	No
EIGA	Pierre Wolfs	EIGA - European Industrial Gases Association	Avenue des Arts, 3-5 B - 1210 Bruxelles	p.wolfs **(AT)** eiga.eu	No
Canada	Kim Headrick	Canada (consumer chemical, pesticides and workplace chemicals)	123 Slater St, AL 3508D, Ottawa, Ontario Canada	Kim.Headrick(**AT)**hc-scg.c.ca	No
SRICI	LIU Gang	Shanghai Research Institute of Chemical Industry Testing Centre	345 East Yunling Road Shanghai, P.R.China, 200062	lgsh33 **(AT)**gmail.com	No
SE-EAQB	Zhenqian Song	Shandong Entry-Exit Inspection And Quarantine Bureau, China	No. 2 Zhongshan Road Qingdao, Shandong Province China 266002	Szqciq (AT)163.com	No

Country/Organiz.	*Name*	*Organisation*	*Contact information*	*Email*	*Confidential*
IMO	Ken McDonald	GESAMP c/o International Maritime Organisation	4 Albert Embankment London SE1 7SR UK	Kmcdonald **AT)**imo.org	No
IPIECA	Derek Swick	American Petroleum Institute for IPIECA	IPIECA 5th Floor, 209-215 Blackfriars Road London SE1 8NL	Swickd (AT)api.org	No
IPPIC	Janice Robinson	NTERNATIONAL PAINT & PRINTING INK COUNCIL (IPPIC)	1500 Rhode Island Ave. NW Washington DC 20005 USA	j.robinson (AT)cepe.org	No
Japan	Hiroshi Jonai	Department of Medical care and Welfare Engineering Graduate School of Science and Technology Nihon University	1-8-14 Kandasurugadai, Chiyoda-ku Tokyo 100-8308 Japan	Jonai(**AT)**medwel.cst.nihon-u.ac.jp	No
Korea	Hye Jin Lee	Occupational Safety and Health Research Institute Korea Occupational Safety and Health Agency (KOSHA)	104-8 Munji-Dong, Yuseong-Gu Daejeon 305-380	Hann1226 **(AT)** kosha.net	No
New Zealand	Peter Dawson	Environmental Risk Management Authority New Zealand	BP House 20 Customhouse Quay, Wellington New Zealand	peter.dawson(**AT)**ermanz.govt.nz	No
Norway	Christine Bjorge	Climate and Pollution Agency	Strømsveien 96 Oslo N-0032 - Norway	Christine.bjorge(**AT)**klif.no	No

Country/Organiz.	*Name*	*Organisation*	*Contact information*	*Email*	*Confidential*
Serbia	Katarina Krinulovic	Serbian chemicals agency	Omladinskih brigada 1, 11070 Novi Beograd Serbia	katarina.krinulovic(**AT)**ekoplan.gov.rs	No
Switzerland	Markus Hoffmann	Federal Office of Public Health	CH-3003 Bern Switzerland	markus.hofmann (**AT**) bag.admin.ch	No
UN secretariat	Rosa Garcia Couto	United Nations Economic Commission for Europe (UNECE) Transport Division - Dangerous Goods and Special Cargoes Section Secretariat of the ECOSOC Sub-Committee of Experts on the GHS	Palais des Nations 8-14, Avenue de la Paix, Geneva-10, CH-1211 Switzerland	rosa.garcia.couto(**AT)**unece.org	No
USA	Maureen Ruskin	OSHA	200 Constitution Avenue, Washington DC, United States	Ruskin.Maureen(**AT)**dol.gov	No

Part II:
Survey responses submitted by the GHS Sub-Committee experts on the classification lists of hazardous chemicals

A. Area: Organisation

Question 1:
Does your country have a list of hazardous chemicals classified in terms of the GHS?

Response	*Country/Organiz.*
No	Argentina
Partially, yes. The Australian Dangerous Goods (ADG) List (aligned with UN Model Regulations on Transport of Dangerous Goods rev15) contains classifications for physical hazards, acute toxicity and aquatic toxicity according to GHS. The ADG Code effectively implements the GHS in Australia through land, air and maritime transport regulations, for those hazard classes covered in the transport sector.	Australia
Yes, the list is included in Annex VI, Table 3.1 to the CLP Regulation (EC) No 1272/2008, the CLP list. In addition, in 2011 a Classification & Labeling Inventory will be developed within the EU. The Inventory is a database which will contain basic classification and labeling information on notified substances under the CLP Regulation and registered substances under the REACH Regulation (Regulation (EC) No 1907/2006). The information will be submitted by manufacturers and importers in accordance with the CLP Regulation.	EU
No	Canada
GESAMP, the Joint Group of Experts on the Scientific Aspects of Marine Environmental Protection, an advisory body to the UN system (FAO, IAEA, IMO, UN-DOALOS, UNEP, UNESCO-IOC, UNIDO and WMO) maintains an up to date, peer reviewed list of the hazards to the environment and human health of ca. 900 chemicals on behalf of the International Maritime Organisation (IMO).	IMO
Japan has the list. The results of the classification, approximately on 1,500 chemicals can be downloaded from the following site: http://www.safe.nite.go.jp/english/ghs_index.html	Japan
Yes.	Korea
Yes. Classifications of various chemicals are contained in a number of documents issued pursuant to the Hazardous Substances and New Organisms Act 1996 (HSNO Act) – notably the Hazardous Substances (Chemicals) Transfer Notice 2006 and the Hazardous Substances (Dangerous Goods and Scheduled Toxic Substances) Transfer Notice 2004. These lists are consolidated in the HSNO Chemical Classification Information Database (CCID) which is available on the ERMA New Zealand website at: http://www.ermanz.govt.nz/hs/compliance/chemicals.html	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
At this moment, Serbia formally does not have a list of hazardous chemicals classified	Serbia

Response	*Country/Organiz.*
in terms of GHS, but the list given in Annex 6 of EU Regulation 1272/2008 is transposed in drafted national legislation which should be adopted in the second quarter of 2010.	
Switzerland is in the process of implementing GHS according to the Regulation (EC) No 1272/2008 (CLP-regulation). Since 1.2.2009, Annex VI Tab. 3.1 of the CLP-regulation (CLP list of harmonised classification and labelling of hazardous substances) is legally binding in Switzerland to the same extend as in the EU for chemicals classified according to GHS/CLP. [Questions 2-16: For Annex VI of Regulation (EC) Nr. 1272/2008: see EU response].	Switzerland
No	SE-EAQB/ China
See below *(Note: refer to question 2)*	UN secretariat
Yes but it is transport-specific only. The transport list is not intended to be a comprehensive list of all materials that are regulated for transport. Rather it is a list of appropriate "proper shipping names" – some of which can cover a broad range of chemicals/mixtures/solutions. The other sectors, consumer, workplace and environmental -- No	USA

Question 2:
Does your country have a list of hazardous chemicals classified in terms of a system other than the GHS? If so, please specify system

Response	*Country/Organiz.*
No	Argentina
Yes. The Hazardous Substances Information System (HSIS) (http://hsis.ascc.gov.au/Default.aspx) is maintained by Safe Work Australia and contains classifications of industrial chemicals, including pesticide active constituents. Pharmaceutical chemicals are not included. The origins of data for the HSIS are the previous EU classification which is reflected in the Australian Approved Criteria for Classifying Hazardous Chemicals. These classifications are regularly updated on advice from Australian assessment agencies. HSIS is updated regularly to reflect changes in EU's 30th Adaptation to Technical Progress to Directive 67/548/EEC. Substances are also listed in the Standard for the Uniform Scheduling of Drugs and Poisons (SUSDP), classified according to legislated criteria contained in National Drugs and Poisons Scheduling Committee (NDPSC) classification guidelines. These guidelines take into account factors other than the hazard of a chemical. The Poisons Schedules contain cosmetics, consumer's products, human pharmaceuticals, as well as some workplace chemicals such as veterinary medicines and pesticides.	Australia
Yes, until 01 June 2015, the EU will have a list of harmonised classifications based on the criteria of the old Directive 67/548/EEC. This list is included in Annex VI, Table 3.2 to the CLP Regulation.	EU
No	Canada
GESAMP hazard profiles are GHS compatible – the notation may be different but the criteria and the hazard banding are the same – and are translated into 'classifications' for Annex II of the MARPOL Convention covering the transport of bulk liquids and	IMO

Response	*Country/Organiz.*
gasses by sea.	
The following laws have the list of hazardous chemicals; however the classification criteria are different from the GHS: 1. Poisonous and Deleterious Substances Control Law 2. Fire Defence Law 3. Act on Confirmation, etc. of Release Amounts of Specific Chemical Substances in the Environment and Promotion of Improvements to the Management Thereof 4. Law Concerning the Examination and Regulation of Manufacture, etc. of Chemical Substances 5. Industrial Safety and Health Law, etc	Japan
Yes. Each ministry (Ministry of Employment and Labor, Ministry of Environment, National Emergency Management Agency) has the lists of hazardous chemicals. For example, there are lists about Toxic substances in Toxic Chemicals Control Act and dangerous goods in Dangerous goods Safety act.	Korea
No (although the list in the UNRTDG Model Regulations is used for the transport of dangerous goods in New Zealand through adoption in the New Zealand Standard NZS 5433: 2007 -Transport of dangerous goods on land.	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
The list of poisons, based on the old Law on Production and Marketing of Poisonous Chemicals, which is repealed by new Law on chemicals in May 2009, contains dangerous chemicals, not only poisons (but classification criteria were not well defined and there for were not comparable with GHS criteria). However, this list will be replaced by new list of hazardous chemicals classified in terms of the GHS and transposed from Annex 6 of EU Regulation 1272/2008, so the List of poisons is not relevant in terms of GHS and the international classification list.	Serbia
Yes. Chinese State Administration Of Work Safety has announced <Dangerous chemicals List> Rev.2008.	SE-EAQB/China
see remark regarding questions 2-16 in the answer to question 1	Switzerland
Yes. The list has been developed and regularly updated since 1953 under the auspices of the UN ECOSOC Sub-Committee of Experts on the Transport of Dangerous Goods (TDG Sub-Committee), on the basis of criteria which were to a large extent, especially for physical hazards, fully compatible with those of the GHS. For health hazards, the list also takes account of human experience	UN secretariat
Yes, the United States has several lists of chemicals developed through both government agencies and consensus organizations. See below for a partial list of various chemical databases.	USA

Question 3:
Is it a list maintained by a government or an industry?

Response	*Country/Organiz.*
Not applicable	Argentina
Government	Australia
The CLP list is maintained by the European Commission. Regularly, additional or revised classifications are included in Annex VI. The last amendment was published in 2009. The Inventory will be established and maintained by the European Chemicals Agency (ECHA).	EU
Not applicable	Canada
By a UN technical organization: namely IMO	IMO
Maintained by the ministries concerned	Japan
Yes, it is maintained by each ministry.	Korea
Government	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
Not relevant because of the reasons given previous responses (question No 2. and 1.)	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
Government	SE-EAQB
The list is maintained by the UN Secretariat on the basis of the decisions taken by the TDG Sub-Committee and inputs by both governments and industry.	UN secretariat
A qualified yes – it is time consuming and cumbersome to keep a list of 10s of thousands chemicals up to date.	USA

Question 4:
Who owns/maintains the classification list of chemicals?

Response	*Country/Organiz.*
Not applicable	Argentina
The current non-GHS lists are maintained by Safe Work Australia and by the Commonwealth Department of Health and Ageing.	Australia
see above	EU
Not applicable	Canada
GESAMP issues a GHS compatible hazard profile (not a classification) at the request of IMO – the owner is IMO and GESAMP	IMO
Maintained by the ministries concerned	Japan

Response	*Country/Organiz.*
The list is maintained by KOSHA.	Korea
Maintained by ERMA NZ under the provisions of the Hazardous Substances and New Organisms Act (HSNO Act)	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
Not relevant because of the reasons given previous responses (question No 2. and 1.)	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
Maintained by Chinese government.	SE-EAQB
The TDG Sub-Committee	UN secretariat
Several lists are maintained by EPA	USA

Question 5:
Is it publicly available?

Response	*Country/Organiz.*
Not applicable	Argentina
Yes, both the HSIS (http://hsis.ascc.gov.au/Default.aspx) and the SUSDP (http://www.tga.gov.au/ndpsc/susdp.htm#susdp) are publicly available.	Australia
Yes, the CLP Regulation is publicly available via the Official Journal of the European Union: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:353:0001:1355:en:PDF The Inventory will be publicly available via the ECHA website.	EU
Not applicable	Canada
Yes, from the IMO website, published as the GESAMP composite list (document BLG.1/ Circ.29, Annex 6 (latest version 30 April 2009).	IMO
Any type of the list of chemicals is publicly available.	Japan
Yes, the information is publicly available via KOSHA homepage (members only). • http://www.kosha.or.kr	Korea
Yes at: http://www.ermanz.govt.nz/hs/compliance/chemicals.html Access is also available through the OECD eChemPortal at: http://webnet3.oecd.org/echemportal/	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
Not relevant because of the reasons given previous responses (question No 2. and 1.)	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
Yes	SE-EAQB

Response	*Country/Organiz.*
Yes. The list is included in Part 3, Chapter 3.2 of the UN Model Regulations on the Transport of Dangerous Goods and is available in the 6 UN official languages (English, French, Russian, Spanish, Arabic and Chinese)	UN secretariat
Yes	USA

Question 6:
Is it a legally binding list of classifications?

Response	*Country/Organiz.*
Not applicable	Argentina
Yes, both lists are given legal effect by Australia's state and territory jurisdictions. Note however, that Safe Work Australia intends HSIS to be merely advisory when the GHS is implemented in 2012 for workplace chemicals, for the reason that it is the duty under workplace chemical laws of manufacturers and suppliers to classify chemicals correctly and the GHS is a self-classification system.	Australia
The CLP list is legally binding. The Inventory is not legally binding.	EU
Not applicable	Canada
The hazard profiles are used as the basis for all IMO Pollution category, ship type and tank type classifications plus the assignment of carriage conditions as an integral part of Annex II of the MARPOL Convention as implemented through the IBC Code.	IMO
There are two types of list, one is legally binding, another not binding. The classification results according to the GHS are not legally binding.	Japan
No, it's not mandatory, for information only.	Korea
Yes, where the classifications are given for a chemical that has an approval under the HSNO Act (an approval number will be given on the CCID record) they are legally binding for that chemical.	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
Not relevant because of the reasons given previous responses (question No 2. and 1.)	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
No	SE-EAQB/
The list, as it appears in the UN Model Regulations is not legally binding, since these Model Regulations are of a recommendatory nature. However, it has been transposed – as a mandatory list-into all major international and regional legal instruments regulating the international transport of dangerous goods such as: the "European Agreement on the Transport of Dangerous Goods" (ADR) (45 contracting parties); the International Maritime Dangerous Goods Code (IMDG Code) (mandatory in 159 countries); the ICAO Technical Instructions on the Safe Transport of Dangerous Goods by Air (mandatory in 190 countries); "European Agreement on the Transport of Dangerous Goods by inland Waterways (ADN) (13 Contracting Parties); Regulations concerning the International Carriage of Dangerous Goods by Rail (44 countries). It has	UN secretariat

Response	*Country/Organiz.*
also been transposed- as a mandatory list- into national legislation governing inland domestic traffic in many countries of the world, e.g. (but not limited to) all EU countries, USA, Canada, Australia	
If we understand this question, the only chemical database that is GHS-compliant is the one used by U.S. DOT, and this database is binding for the shipping and transport sector.	USA

Question 7:
By which process is the classification of chemicals derived?

Response	*Country/Organiz.*
Not applicable	Argentina
The substances on HSIS are classified in accordance with the Australian Approved Criteria for Classification of hazardous substances, which is based on the pre-GHS EU classification scheme. The substances on Australia's Poisons Schedule are classified in accordance with Australian-specific guidelines that include both hazard and risk assessment processes to categorise chemicals.	Australia
CLP list: In accordance with Article 37 of the CLP Regulation, proposals for harmonised classifications can be submitted by EU Member States (MS) Competent Authorities (CAs) or, subject to certain conditions, by industry. These proposals are to be submitted to ECHA established under Regulation (EC) No 1907/2006 (REACH Regulation). After the consultation of the Risk Assessment Committee (RAC) managed by ECHA and composed of experts from EU MS and stakeholders, ECHA prepares a harmonised classification and labelling proposal. The proposal is then open for public consultation. Following the public consultation, RAC prepares an opinion on the proposal for harmonised classification and labelling and ECHA forwards the opinion and comments received to the EU Commission. The Commission, if it finds the harmonisation of the classification and labelling of the substance concerned appropriate, will draft a legislative proposal to include the classification and labelling information in the Tables 3.1 and until 01 June 2015 in Table 3.2 of Annex VI to the CLP Regulation. The legislative proposal will need to be adopted by a regulatory procedure with scrutiny. **Inventory:** Where for the same substance, the notifications result in different entries on the Inventory, the notifiers shall make every effort to come to an agreed entry to be included in the inventory. The notifiers shall inform ECHA accordingly.	EU
Not applicable	Canada
Hazard profiles are determined by peer review of publicly available and proprietary industry data.	IMO

Response	*Country/Organiz.*
The GHS inter-ministerial committee has discussed the classification result when the substance is classified according to the GHS. Currently there is another mechanism to classify the substances which are regulated in the laws described above.	Japan
Chemicals are classified by expert judgement according to internal classification guideline.	Korea
Existing chemicals (pre-2001) were transferred into the HSNO Act framework by ERMA NZ following classification against the criteria contained in the Hazardous Substances (Classification) Regulations 2001. These criteria align with the early version (2000) of the GHS. These chemicals were classified using the best data available to ERMA New Zealand at the time of classification. New chemicals (post-2001) are subject to an application process by industry to ERMA NZ which involves the classification against these same (early GHS) criteria. The applicant provides the classification of the chemical in the application and this is reviewed by ERMA New Zealand. Applications are open for public consultation. Information on the application process can be found at: http://www.ermanz.govt.nz/hs/applications/release.html	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
Not relevant because of the reasons given previous responses (question No 2. and 1.)	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
Currently chemicals are classified according to their intrinsic hazards defined by TDG criteria and will be classified by GHS	SE-EAQB
Chemicals are classified according to their intrinsic hazards defined by GHS criteria to the extent these criteria are relevant in the transport context. Classification is made on the basis of consideration of data submitted to the Committee of Experts by governments, intergovernmental and international organizations.	UN secretariat
Not Applicable	USA

Question 8:
Can you provide a reference for the applied classification criteria?

Response	*Country/Organiz.*
Not applicable	Argentina
Yes: Australian Approved Criteria for Classifying Hazardous Substances [NOHSC: 1008 (2004)] (http://www.safeworkaustralia.gov.au/NR/rdonlyres/C3F31984-D009-415E-A5BA-F6CD5638A7EF/0/approved_criteriaNOHSC1008_2004.pdf) and NDPSC Guidelines (http://www.tga.gov.au/ndpsc/ndpscg.pdf)	Australia
The applied classification criteria are laid down in Annex I to the CLP Regulation which is based on the GHS.	EU
Not applicable	Canada
Hazard profiles are prepared according to GESAMP Reports & Studies 64 (2002), available from www.gesamp.org	IMO

Response	*Country/Organiz.*
Concerning the GHS classification: Yes. The JIS (Japan Industrial Standards) for GHS classification and Classification Manual have been published. Concerning substances regulated in the laws: Case by case	Japan
Yes, the guideline is available in from http://oshri.kosha.or.kr.	Korea
The classification criteria are contained in the Hazardous Substances (Classification) Regulations 2001 (http://www.legislation.govt.nz/regulation/public/2001/0113/latest/DLM33833.html) which are issued under the HSNO Act. The criteria in these regulations are based on the proposals for the GHS in 2000. A table on the CCID web page denotes the differences between the HSNO Act classification criteria and more recent versions of the GHS. A process to update these regulations to reflect the 3rd Revised Edition of the GHS (2009) is underway, see: http://www.ermanz.govt.nz/hs/abouths/ghscriteria.html A guide on the application of the existing criteria to the classification of chemicals and mixtures is available at: http://www.ermanz.govt.nz/hs/t&c/HSNOUGTC.pdf	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
Not relevant because of the reasons given previous responses (question No 2. and 1.)	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
China government has regulated dangerous chemicals using UN Model Regulations. GB(national standard) 13690-2009 (General Rule for Classification and Hazard Communication of Chemicals) stipulates that chemicals shall be classified according to the 26 GHS classification standards, which are already in place.	SE-EAQB
The Classification criteria are described, for each of the hazard classes, in the relevant chapters of Part 2 of the UN Model Regulations.	UN secretariat
See links below *(Note: refer to Part III of this document)*	USA

Question 9:
Does the list contain the data on which the classifications were made?

Response	*Country/Organiz.*
Not applicable	Argentina
No, neither the SUSDP nor HSIS contain the data used on which the classification is based. HSIS contains only the source of information and reference. Note: UN RTDG data considered by the Committee in the past is kept by the UN Secretariat and can be obtained on request. The data on which Australian authorities based classification decisions (such Poisons Schedule decisions) are held by the responsible regulator.	Australia
CLP list: No it does not. However, for classifications made until mid 2007, the reports which summarise the conclusions for a classification are publicly available via the web site of the Joint Research Centre. For classifications made after this period the documentation is available on ECHA's website, subject to confidentiality claims.	EU

Response	*Country/Organiz.*
Inventory: No it does not. However, where a substance has been classified in some but not all hazard classes or differentiations, an indication of whether this is due to lack of data, inconclusive data, or data which are conclusive although insufficient for classification should be indicated.	
Not applicable	Canada
The list contains metadata in the form of banded ratings in order to protect confidential data; the original data is maintained in hard copy and electronic form by IMO in London, including confidential company information – all hazard profiles can be reconstructed at any point in time on the basis of the archived information.	IMO
Concerning the GHS classification : Yes Concerning substances regulated in the laws: No	Japan
No, but in preparation. The data concerning classification can be searched on website by each chemical, not the list	Korea
Yes. In many cases this is test data from international published sources that has been evaluated against the HSNO (GHS) classification criteria. In other cases, the classification has been derived by 'translation' from existing EU classifications ie. R phrases.	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
Not relevant because of the reasons given previous responses (question No 2. and 1.)	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
No	SE-EAQB
No. The secretariat keeps records of data submitted (which are issued in official UN documents for consideration by the TDG Sub-Committee). A form for submitting such data is included as Figure 1 of the United Nations Recommendations on the Transport of Dangerous Goods	UN secretariat
Nil	USA

B. Area: GHS

Question 10:
What type of GHS classified chemicals, if any, do you have on that list?

Response	*Country/Organiz.*
Not applicable	Argentina
The HSIS does not use the GHS as a basis for classification at this time but will contain GHS-classified chemicals from 2012. Plans for reclassifying the SUSDP, for which the scope is domestic chemicals including cosmetics, according to GHS are being developed.	Australia
CLP list: The list includes classifications of industrial substances, active ingredients of Plant Protection Products and Biocides. **Inventory:** Under the CLP Regulation a notification has to be submitted for the following substances: - Substances subject to registration under REACH and placed on the market. This will also apply to certain substances contained in articles where REACH Article 7 provides for their registration. In case a substance has already been registered under REACH with the CLP classification and labeling or notified under CLP no further notification shall be submitted; - Substances classified as hazardous under CLP and placed on the market, irrespective of the tonnage; and - Substances classified as hazardous under CLP and present in a mixture above the concentration limits specified in Annex I of CLP or as specified in the Dangerous Preparations Directive (Directive 1999/ 45/EC), which results in the classification of the mixture as hazardous, and the mixture is placed on the market.	EU
Not applicable	Canada
Ca. 900 of the highest volume and most frequently transported chemicals.	IMO
The hazardous chemicals classified according to the GHS are those which are required MSDS by the laws followed. 1. Industrial Safety and Health Law 2. Poisonous and Deleterious Substances Control Law 3. Act on Confirmation, etc. of Release Amounts of Specific Chemical Substances in the Environment and Promotion of Improvements to the Management Thereof	Japan
The list includes industrial substances which is legally controlled or highly used among existing chemicals in Korea.	Korea
Industrial chemicals; dangerous goods (as in UNRTDG, including gases, solvents, petroleum substances); components of commercial, domestic, and industrial products; pesticide, veterinary medicine and pharmaceutical active ingredients.	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
Not relevant because the list of poisons was not prepared according to criteria	Serbia

Response	*Country/Organiz.*
comparable with the GHS criteria. Furthermore, this List of poisons will be repelled in second quarter of 2010 and replaced by new List of classified substances which will be fully transposed from Annex 6 of EU Regulation 1272/2008.	
see remark regarding questions 2-16 in the answer to question 1	Switzerland
Not applicable	SE-EAQB
Most types of GHS classified chemicals, provided that they are most commonly transported, and except those possessing hazardous properties that do not require specific transport conditions. The hazards covered are all physical hazards (with some low hazard categories excepted in a few cases); acute toxicity (Cat. 1, 2 and 3); corrosivity, and hazardous to the aquatic environment (Acute 1 and Chronic 1 and 2) (For transport in sea-going or inland navigation chemical tankers:: Acute 1,2 and 3 and Chronic 1,2 and 3). Hazards to the environment are not indicated if the substance possesses other hazards subject to transport regulations. There are nevertheless identified in the IMDG Code list (marine pollutants). Hazards not relevant to the transport regulatory system are not indicated	UN secretariat
For transportation only	USA

Question 11:
Are the chemicals on the list classified in accordance with the GHS classification criteria?

Response	*Country/Organiz.*
Not applicable	Argentina
Currently workplace chemicals are classified according to the Australian Approved Criteria for Classifying Hazardous Substances [NOHSC: 1008 (2004)] which is based on pre-GHS EU classification scheme. Substances listed in the Standard for the Uniform Scheduling of Drugs and Poisons (SUSDP) are classified according to legislated criteria contained in National Drugs and Poisons Scheduling Committee (NDPSC) classification guidelines.	Australia
Yes, in so far as the GHS criteria are included in Annex I to the CLP Regulation. However, the CLP Regulation does not include all GHS categories. For example, the CLP Regulation does not cover categories such as acute toxicity cat. 5, aspiration hazard cat 2 and aquatic toxicity cat 2 and 3.	EU
Not applicable	Canada
They are rated according to GHS criteria.	IMO
Yes. As for some laws concerned, it's under consideration to accord criteria of substances regulated by the laws to GHS criteria.	Japan
Yes.	Korea
Yes, but as discussed above the classification criteria used are essentially those contained in the original (2003) version of the GHS. The exception is the criteria for flammable aerosols which were taken from the UNRTDG 11th revised edition (1999). The classifications contained in the CCID are denoted by the New Zealand alphanumeric codes for identifying the GHS classification categories. However, a table is available on the CCID web page that provides correlation of these with the GHS categories.	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
No, but it is not relevant because the List of poisons will be repelled very soon and replaced by new List of classified substances fully transposed from Annex 6 of EU Regulation 1272/2008.	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
SE-EAQB/ China	SE-EAQB
In theory yes, to a large extent, in particular for physical hazards. However, for toxicity, the criteria have changed over the time, and substances have not been systematically reclassified on the basis of new criteria, since the TDG Sub-Committee considered that adoption of new criteria should not affect existing classified substances. In addition, some substances were classified a long time ago on the basis of human experience, and human experience does not necessarily match the GHS criteria. Some substances were also classified on the basis of test results, and this classification may be sometimes more realistic than classification based on the application of some	UN secretariat

Response	*Country/Organiz.*
"default" classification systems allowed by the GHS (e.g. use of pH values for corrosivity, which can lead to over classification in the transport system)	
Yes, but does not include all of the health classes	USA

Question 12:
In case if not all the chemicals on your list are classified in accordance with the GHS criteria, how many GHS classified chemicals do you have listed?

Response	*Country/Organiz.*
Not applicable	Argentina
Not applicable Note: There are 1200 pure substances on the ADG list of chemicals which are classified according to the GHS for physical, acute toxicity and environmental hazards.	Australia
The CLP list (table 3.1 of Annex VI to CLP Regulation) includes approximately 4000 entries covering approximately 8000 substances classified according to the GHS criteria.	EU
Not applicable	Canada
All follow the GHS criteria.	IMO
1,500 chemicals	Japan
11,377 chemicals are classified in accordance with the GHS	Korea
There are approximately 5400 GHS classified chemicals on the HSNO CCID. As noted above, a number of these have been classified by 'translation' from existing EU R-phrase classifications.	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
Nil	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
Not applicable	SE-EAQB
About 1700. The Dangerous Goods list contains about 2700 entries but some of them correspond to articles (out of the scope of the GHS), hazards not subject to GHS (radioactivity, infectious and other miscellaneous hazards). Furthermore the list includes a great number of generic or so-called "Not otherwise specified" entries which are intended to let the industry to properly classify, for transport; substances which are not listed by name but which meet the classification criteria. Only substances carried internationally in significant quantities are deemed to deserve an entry in the list.	UN secretariat
Nil	USA

C. Area: Resources

Question 13:
Do you have sufficient resources for maintaining the list?

Response	*Country/Organiz.*
Not applicable	Argentina
There are adequate resources to maintain the existing classification list of chemicals (HSIS), however this is dependent on the EU continuing to revise their classification list in table 3.2 in Annex 6 of the CLP regulations. There are limited resources available to maintain the chemicals listed under the Poison Schedules.	Australia
CLP list: The legal basis to maintain the list is laid down Title V, Chapter 1 of the CLP Regulation. **Inventory:** The legal basis to maintain the Inventory is laid down in article 42 of the CLP Regulation.	EU
Not applicable	Canada
Yes, industry submitting new substances for evaluation is charged a fee per hazard profile. The work is also supported by IMO since 1969.	IMO
It depends on the number of chemicals to be classified.	Japan
Yes.	Korea
At present yes. Only a few new chemicals are introduced to New Zealand each year and these are able to be added to the list. Also, corrections are able to be made to the list as new information is provided and classifications updated on an annual basis.	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
This question is not relevant for old List of poisons, but government established the Serbian chemicals agency as institution responsible for chemicals management in Serbia, as well as, maintaining of List of classified substances transposed from Annex 6 of EU Regulation 1272/2008. This new list will be published in Serbian Official Gazette in the second quarter of 2010. As this list will be made and amended by simplified procedure e.g. transposition from EU Regulation there are enough resources for its maintaining.	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
Yes. Chinese state administration of work safety has worked on preparation of new edition of <Dangerous chemicals List>, which will classify dangerous chemicals based on GHS.	SE-EAQB
Yes	UN secretariat
Nil	USA

Question 14:
Do you have future plans set in place for the maintenance of the list?

Response	*Country/Organiz.*
Not applicable	Argentina
Yes, Safe Work Australia intends to adopt the EU classification list in Table 3.2 in Annex VI of CLP as part of implementation of the GHS for workplace chemicals in 2012 and continue to update this list as Australian agencies classify pesticide active ingredients and other industrial chemicals. However, the list will be non-mandatory and for guidance only. Maintenance of the Poisons schedules for domestic chemicals including cosmetics is an ongoing process.	Australia
See answer above. *(Note: refer to question 13)*	EU
Not applicable	Canada
The GESAMP composite list is up to date having been completely revised by a dedicated peer review group of GESAMP between 1998 and 2006, when the revised Annex II of MARPOL entered into force	IMO
Under consideration Some Ministries concerned already have draft results of classification of substances based on GHS criteria.	Japan
Yes.	Korea
No specific plans are set in place, however, after the classification criteria are updated in the HSNO regulations a number of the classifications currently assigned to chemicals on the CCID will need to be updated. It is likely this will occur over a 5 year period (2011-2015).	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
This question is not relevant for old list of poisons, but the new List of classified substances will be made and amended by transposition from Annex 6 of Regulation 1272/2008. In this regards, the New Law on Chemicals provides a legal basis for preparation and adoption of bylaw regulating implementation GHS. The Law on chemicals has taken into account the existing EU regulations on classification, labeling and packaging (Directive 67/548/EEC; Directive 1999/45/EC) but also the new EU Regulation on GHS (Regulation 1272/2008) which will be fully transposed into national legislation by adoption of corresponding bylaw, as well as the transitional periods for re-classification and re-labeling of chemicals according to this EU Regulation.	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
Yes. Draft of <Dangerous chemicals List> will release in late 2010 and will be amended and maintained in future	SE-EAQB
This is done on a regular basis as the needs occur and on the basis of proposals by governments/industry	UN secretariat
Nil	USA

Question 15:
Is the classification list to be expanded or developed?

Response	*Country/Organiz.*
Not applicable	Argentina
The GHS classification list of chemicals on HSIS will expand over time as the EU under the CLP Regulations and Australia's Commonwealth government agencies classify veterinary medicines, pesticide and other industrial chemicals as part of the authorisation processes.	Australia
The development of the list has been and will be an ongoing process.	EU
Not applicable	Canada
It expands by ca. 10 to 20 requests for new chemicals per year and an equal number of queries from industry for modifications to profiles based on new data – it is thus in a relatively stable phase following a decade of investment. Being embedded as It is in the Convention implementation mechanism of a UN technical agency, it is properly maintained.	IMO
Expanded.	Japan
Yes.	Korea
It is likely to be developed as described above *(Note: refer to question 14)*. As resources permit, it may be expanded to include some component chemicals which are present only in mixtures in New Zealand.	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
Yes, as it considers the List of classified substances that is transposed from Regulation 1272/2008.	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
It is likely to be developed as described above in question 14.	SE-EAQB
Yes. The list is updated every 2 years, but bearing in mind that only substances that are carried in significant quantities are listed, the other ones have to be self-classified by the industry under the relevant generic entry.	UN secretariat
Nil	USA

Question 16:
Describe how it will be developed?

Response	*Country/Organiz.*
Not applicable	Argentina
The same as current arrangements.	Australia
See the answer above about the process of classification.	EU
Not applicable	Canada
Maintenance or development is at the request of IMO – GESAMP is a subsidiary body	IMO

Response	*Country/Organiz.*
Ministries concerned fund and organize the classification projects.	Japan
About 1,800~2,000 chemicals will be newly classified every year. The chemicals already classified will be reviewed by annual plan.	Korea
As above *(Note: refer to questions 14, 15).*	New Zealand
Norway will implement the EU regulation on classification and labeling of substances and mixtures, CLP. See response from the EU commission.	Norway
The new List of Classified Substances will be fully transposed from the Annex VI to EU Regulation 1272/2008. If new substances are added into Annex VI to EU Regulation 1272/2008 it will be added into List of classified substances.	Serbia
see remark regarding questions 2-16 in the answer to question 1	Switzerland
The old edition of <Dangerous chemicals List> is based on UN Model Regulations and focus on acute/physics dangerous category. The new edition of <Dangerous chemicals List> will be based on GHS and will add healthy/environment dangerous category into	SE-EAQB
Following consideration of data submitted to the Committee of Experts by governments, intergovernmental and international organizations.	UN secretariat
Nil	USA

D. Area: For the future discussions on classification lists

Question 17:
Would you find an international list of chemicals classified in terms of the GHS useful?

Response	*Country/Organiz.*
An international list/database of GHS classifications for substances would be a useful resource for companies, particularly those with limited resources (e.g. small enterprises) but the use of such a list should be voluntary. However, it is recognised that some countries/regions may choose to mandate the classification of certain substances.	AISE
Many industries and governments are engaged in implementing the GHS, which is a resource-intensive process. Adding to this burden by asking the commitment of resources to develop an international list of classified chemicals could be expected to divert resources away from implementation initiatives at the national and regional levels, thereby delaying implementation. The process of developing such a list would be burdensome because it should address factors that contribute to the current state of different classifications and establish procedures that address the sources of those differences, including: 1. Differences in how countries are implementing the options incorporated in the GHS 2. Challenges in linking chemicals to relevant sets of data. Datasets that nominally appear to be relevant to the same substance, under the definition of "substance "under the GHS may actually apply to different substances when the additives, impurities and solvents are considered. That will likely require knowledge of the processes used to produce a substance, which may not be readily available. 3. Differences in how classifiers apply expert judgement and weight of evidence evaluations Until the technical issues are resolved, creation of a single, global list can't be done. Even with technical issues resolved, consideration of producing such a list should be set aside until the time when countries are more harmonized on the options they adopted for GHS implementation	ACI
Yes, because it will provide the same classification criteria.	Argentina
If the classifications of the chemicals were derived based on an internationally agreed process to which Australia subscribed, then 'yes' the list would be useful, but only for guidance purposes rather than regulation. For an international classification list to be useful, particularly as a guide to foster consistency, internationally agreed processes would need to be developed for the nomination of candidate chemicals, review processes and the classification of chemicals (choice of end points, study relevance etc), as well as for managing data ownership issues. Australia would need to engage in whole of government discussions before agreeing how such a list could be developed and used. This would need to be further considered as a significant policy decision of government.	Australia
YES. Most suppliers of chemicals operate on a global basis and are using global management tools for classification, labelling, SDS, transport documents, etc. A difference in classification in different regions for the same chemical prevent the effective use of the global tools	EIGA
To set up an international list of classified substances could be very useful. It is also in	EU

Response	*Country/Organiz.*
line with the SAICM objective with regard to knowledge and information on chemical substances. However, it will be a tremendous task, therefore priorities (e.g., limited to some hazard classes, specific categories of substances like pesticides) have to be set, procedures have to be developed etc. by taking into account existing activities (e.g., dangerous goods list of the UN, list of the International Agency for Research on Cancer)	
Possibly, provided that the list uses the same classification criteria adopted by the various sectors in Canada and that there is agreement on the datasets used.	Canada
The need does not arise for GESAMP – most of the new chemicals being submitted are not pure chemicals but substances and mixtures as transported.	IMO
An international list of chemicals classified in terms of the GHS has the most value when it is accepted by all countries implementing the GHS. The proliferation of national/regional lists is contrary to harmonization. See answers to Question 19 for attributes necessary to make an international list of chemicals classified in terms of the GHS useful. The benefits of an international list of chemicals classified in terms of the GHS include supporting cost-effective implementation; avoiding duplication of effort; and promoting harmonization/consistency in classification. These benefits apply to everyone and will be greater in countries without national GHS implementing legislation and regulation.	IPIECA
A unanimous YES. Especially useful (or even necessary) for small to medium businesses which lack resources to devote to classification, and/or for those operating in more than one country/region. Comment: to be useful the classifications must be based on multiple datasets and be universally accepted.	IPPIC
It must be very helpful and useful when content of the list is proved to be adequately reliable and reasonable, for example, by disclosing the data (or information) on which the classifications were made.	Japan
Yes, it will be useful and correspond to original purpose of the GHS	Korea
Yes.	New Zealand
Norway take part in the EU work related to the harmonised list of classification in Annex VI of the CLP regulation and support this work. This ECHA inventory list will be available on internet for all users from all countries. Since this list is based on the GHS criteria, suppliers from developed and less developed countries can use this list in their work with classification and labelling. The idea of an international list of chemicals at the GHS level might be useful in theory and supports the idea of GHS. However, this will require a lot of resources to establish and maintain. Norway is therefore reluctant to support an establishment at GHS level at this stage, since this will be complicated, need a lot of resources and be very time consuming. If additional resources are available, we would prefer to use this on further development of the criteria in the recommendation and a future development of a manual of decision. Also resources could be spent on helping developing countries implementing GHS.	Norway
Yes	Serbia
Yes, an international list of harmonized classifications of chemicals would be useful and could be an important part of the overall harmonization process.	Switzerland

Response	*Country/Organiz.*
Very useful	SE-EAQB
Yes, there are some lists very useful such as EU list.	SRICI
Yes	UN secretariat
This question is premature for United States. OSHA is currently compiling comments from their stakeholders on the usefulness of lists submitted to OSHA through their rulemaking process. OSHA is scheduled to report on the feedback at the next UN subcommittee working group meeting	USA

Question 18:
What do you see as the primary group of users of an international classification list (manufacturer's guidance or for harmonisation only)?

Response	*Country/Organiz.*
Any international classification list of GHS classifications for substances should be provided as guidance only. Chemical producers or users should be allowed to self-classify as far as possible (in line with GHS 1.3.2.1.2). Companies with valid data that show results which are contrary to the listed classification, should be free to use such results for classification	AISE
National, regional, or other available lists or databases of classifications for individual chemicals might provide useful references for classifiers and labelers, particularly those with fewer resources (e.g., small enterprises). However, as countries move forward with GHS implementation, the objective of self-classification stated in the GHS framework should be maintained. Therefore, use of such lists should be voluntary. However, all classifiers may find value having access to data on substances that can be used to decide on a classification for a substance.	ACI
Developing countries, countries with economies in transition, specialy small and medium enterprises.	Argentina
This would depend on the type of list developed and its purpose. At present, lists are used by manufacturers and suppliers of chemicals and chemical products for compliance with their duties to classify under hazardous chemicals regulations, primarily for the purposes of producing labels and SDS. Australia's HSIS is also used for compliance and enforcement purposes by safety regulatory authorities.	Australia
The suppliers of chemicals	EIGA
The primary group of users would be suppliers and users of substances and authorities in developed and developing countries, as well as the packaging and transport sectors	EU
Developing countries, countries with economies in transition, industry – particularly small and medium enterprises.	Canada
UN agencies such as IMO, UNIDO, ILO, etc Developing countries setting up Chemicals control for the first time and not wishing to repeat classifications Harmonization and manufacturers guidance	IMO
An international list of chemicals classified in terms of the GHS is useful to governments to avoid duplication of effort in creating national systems; to facilitate international trade in chemicals; to promote harmonization/consistency; and to reduce the costs of enforcement. Also an international list of chemicals classified in terms of	IPIECA

Response	*Country/Organiz.*
the GHS will improve safety for workers and others through consistent and harmonized communications on chemical hazards and practices to follow for safe handling and use. An international list of chemicals classified in terms of the GHS is useful to manufacturers to promote cost-effective implementation; to facilitate international trade in chemicals; in applying expert systems resulting in maximizing expert resources and minimizing labour and costs; to facilitate electronic transmission systems with international scope; to promote harmonization/consistency; to expand the use of training programs on health and safety; to improve the credibility of communication; and to reduce laboratory testing on animals. Furthermore, an international list of chemicals classified in terms of the GHS will greatly benefit countries without national GHS implementing legislation and regulation and countries lacking the capacity to implement the GHS.	
Use is foreseen equally by both - manufacturers/suppliers/users of chemicals, to classify their products, and - government regulators, to ensure harmonisation between territories.	IPPIC
Firstly manufactures of chemicals and articles including chemicals, secondly government (ministries concerned).	Japan
It's helpful to government, manufacturers, NGO, union, and especially developing countries	Korea
Manufacturers and suppliers of chemicals and chemical products – primarily for the classification of mixtures for the purposes of producing labels and SDS. Also regulatory agencies for the purposes of international harmonisation and border control and enforcement authorities.	New Zealand
See comments above *(Note: refer to question 17)*	Norway
An international list of chemicals classified in terms of the GHS could be useful as list that Serbian manufacturers and exporters, as well as importers could use as reference for classification of substances which are not on EU market and are not given in List of classified substances transposed from Annex 6 of EU Regulation 1272/2008, but the classification must be done according to the rules given in national legislation which is harmonised with EU legislation in this area.	Serbia
Industry (manufacturers of substances, formulators of mixtures, suppliers of chemical products), enterprises of the transport sector, professional users of chemicals, NGOs, authorities of countries	Switzerland
This international classification list can help classification harmonization between different countries and give guides to manufacturers, retailers, transport departments and customers.	SE-EAQB
The list should be consistent in all countries no matter it is used for guidance or for harmonisation.	SRICI
Manufacturers, especially small and medium enterprises, control and enforcement authorities, developing countries	UN secretariat
We will include this in our feedback in July	USA

Question 19:
Who should develop and maintain such an international list?

Response	*Country/Organiz.*
Suggest that such a list should come under the auspices of the UNSCEGHS	AISE
If a program to develop an international list were to go forward, the capabilities of candidate intergovernmental organizations to develop and manage the list should be assessed against a set of criteria. The criteria should address the size of the resources and competency of the resources needed to perform the task. Regarding the needed competency, the development of an international list would require strong expertise in environmental and human health assessment, such as OECD and IPCS. During the development of procedures for creating an international list of classifications, the implementation of those procedures, and during future processes to maintain such a list, there would need to be transparency, including the opportunity for stakeholder review and comment on the data used in the classification and the decision rationales, as well as a dispute resolution process. Any effort to develop an international list of classifications should also recognize existing internationally agreed classifications and not duplicate past or current work to develop and maintain classifications. If work were to go forward on the development of an international list, given the large number of substances in commerce, a process for prioritizing the work would be critical.	ACI
The initial focus should be in the International Chemical Safety Cards developed through the International Programme on Chemical Safety.	Argentina
If agreed that a list should be developed, an internationally recognised body, such as the UNSCEGHS or OECD, could develop the list, but processes and data used to develop the list must be agreed upon by all stakeholders.	Australia
It should be done at the level of the UNSC-GHS in a similar way it has been done and still is being done for the dangerous goods list by the UNSC-TDG	EIGA
A possible model would be for the list to be maintained overall by the UNSCEGHS with technical input from OECD, IARC, transport sub-committee. The list could be an Annex to GHS	EU
The initial focus should be in the International Chemical Safety Cards developed through the International Programme on Chemical Safety. These cards are peer-reviewed.	Canada
'No comment'	IMO
An expert group should be formed under the UNSCEGHS structure to develop the international list. This is an especially challenging issue as developing and maintaining a list is very resource intensive. Perhaps there are opportunities to share the burden. In order to promote the overarching GHS goals of global harmonization and facilitation of trade, it is essential that any international list of chemicals classified in terms of the GHS: • be based on a rigorous, evidence-based scientific process to be defined in advance and applied globally; • contain the data to support the classifications or a section explaining the rationale behind the classifications;	IPIECA

Response	*Country/Organiz.*
• ensure accuracy by including impurities and CAS numbers for the chemicals; • include mechanisms for updating as new evidence based science becomes available; • have defined criteria for source data; • provide a conflict resolution mechanism; and • have provisions for stakeholder input/data.	
A group under the auspices of an international organisation (such as UN or OECD) is regarded as most appropriate. Governments should provide resources to develop and maintain the list as part of their GHS implementation commitment. Some suggested that ILO (SafeWork) would be an appropriate body to co-ordinate this (as for International Chemical Safety Cards).	IPPIC
Relevant UN bodies and OECD should work together cooperatively.	Japan
Working group under UN GHS sub-committee including experts in TDG, IARC, etc. needs to be organized.	Korea
This would require a large commitment of resources. Ideally it could be maintained by the UNSCEGHS and its Secretariat in a similar way to the list of Dangerous Goods in the UNRTDG Model Regulations. However, the process for development and maintenance and who and where the work would be done would need quite a bit of thought, work and resources. Another possible option would be for the OECD eChemPortal to be developed into a database of internationally agreed GHS classified chemicals rather than as it is at present as just a portal to other databases, some of which contain GHS classifications.	New Zealand
See comments above. *(Note: refer to question 17)*	Norway
One of UN organisations cooperating with countries that have the lists of chemicals classified in terms of the GHS. The harmonisation of classification and labelling of substances and the classification and labelling inventory given in Title V of EU Regulation 1272/2008 could be used as model for development of such list.	Serbia
As the development and maintenance of a classification list is an enormous task it should be carefully evaluated whether existing groups of experts working on hazard assessments and/or classifications on an international level (e.g. OECD, IARC, SCE TDG, ...) could be involved in the process and contribute to the development of a list.	Switzerland
A kind of system should be built to make this list be maintained regularly, like “dangerous goods list” in UN Model Regulations.	SE-EAQB
GHS sub-committee and other relative organisations	SRICI
Organisations (intergovernmental and NGOs) and governments which have specific expertise in chemical classification should contribute to the exercise, but the list should be kept under the control of the GHS Sub-Committee and issued by it to make sure that there is consensus on the harmonized classification proposed.	UN secretariat
Initial comments have indicated that the International Chemical Safety Cards may be appropriate since they are peer-reviewed. They have already begun the process of providing GHS classifications. They have completed GHS classifications for approximately 25% of the chemicals on their list. (However, see the comment below) *(Note: refer to question 20*)	USA

Question 20:
Would it be possible to make a classification list of one country/industry available for all countries?

Response	*Country/Organiz.*
Believe it could be possible – the EU list of substances with harmonised classifications is freely available on the internet and has been used by other countries in the past. The EU classification and labelling inventory will also be available post December 2010.	AISE
Among the national and regional implementation initiatives are efforts to publish and maintain lists of GHS classifications for individual chemicals (e.g., New Zealand, Japan, EU). Some intergovernmental groups are doing the same (e.g., IPCS). However, it has been established that the lists now available are inconsistent with regard to their classifications of the same chemical (for reasons referred to in response to question 17). Therefore, no single existing classification list should be selected as the one definitive list to make "available to all countries." As an alternative to selecting one list, a mechanism could be set up to facilitate awareness and access to any existing lists. However, recognizing the differences in information and procedures used to develop national and regional classifications, there should be complete transparency associated with every classification as to the GHS criteria applied, the information set that provided the basis for the classification, the composition of test materials that the information sets apply to in order to judge their relevancy to a substance being classified, and the expert judgments and weight of evidence evaluations applied to the classification decision. Without transparency on these points, the classifier would not know if the classification is relevant to their national or regional rules, or the substance they are trying to classify, or if the dataset is consistent with the dataset they had available locally. In addition, a mechanism for users of such a list to offer additional information on a substance or its classification should be provided. Considering the points above, it may be more valuable for classifiers to have access to the data underlying existing classifications than the classifications themselves.	ACI
Yes, if the list uses the same classification criteria and if there is agreement on the databases used.	Argentina
Yes, in theory, as that is the approach currently taken in the workplace sector in Australia which relies on EU classifications. However in practice it would be highly unlikely, as all countries would need to agree on the data and processes used to develop the list.	Australia
We suggest to start with the list that will be made available by the European Chemical Agency (ECHA) within a few months after the deadline for the phase 1 or the registration of >1000T/y chemicals under REACH. The test data that supported the GHS classification will be made public and be open for checking and challenge by other regional authorities.	EIGA
Having in mind the need develop priorities to set up an international list of classified substances (see above), it may be more realistic to aim for an independent list under the ownership of the UNSCEGHS, taking into account experience gained in developing other regional/national/sectoral lists such as the TDG list, IARC list or the EU CLP list and inventory. In addition, in existing lists there are differences in classification of the same chemicals – by reason of different data used for classification and different approach for evaluation of this data. Therefore, the data which were used as a basis for classification should be collected and comprised.	EU

Response	*Country/Organiz.*
Possibly, provided that the list uses the same classification criteria adopted by the various sectors in Canada and that there is agreement on the datasets used.	Canada
Politically probably not – the GESAMP list has the advantage that it is international in application, peer reviewed, open to comment and well maintained, if little known outside the shipping world.	IMO
Most countries/regions/organizations already make their lists readily available. [South Korea has yet to make their list available outside of South Korea]. The UNSCEGHS could facilitate access to this classification information by providing links or copies of the various lists on the UN GHS website. This would be a helpful interim step. Before even developing the list, the criteria for inclusion of chemicals on the list should be first agreed. The difficulty in using a specific list is the ability of global stakeholders to comment and to provide input/data on specific listed chemicals. Depending on the list, special interests, politics, and other factors have varying degrees of influence. How would other countries/industry resolve conflicts?	IPIECA
This is certainly possible, but a consensus process would be needed to ensure its acceptance in other countries. An aggregation of existing country classification lists would be the preferred basis for an international list, rather than the list from any single country. Differing GHS implementations from country to country (as a result of the building block approach) are likely to yield different classifications for the same chemical, which would have to be resolved and harmonised	IPPIC
It would be possible, but not so easy. It depends on the international consensus.	Japan
Yes.	Korea
Yes, in principle, as several such lists are already available if others wish to use them. However, it has been established that one of the problems with the lists that are now available is that there are inconsistencies between them in terms of the classifications given for the same chemicals. The New Zealand CCID list is available on the internet, but since the classifications on this are given in terms of the NZ descriptors of the GHS hazard categories it is not perhaps as readily useable as some other lists. The list contained in Annex VI, Table 3.1 to the EC CLP Regulation No. 1272/2008, is perhaps the most likely to be used by other jurisdictions, as there are several of these that already use or rely on the existing EU classifications that are now contained in table 3.2 of the EC CLP Regulation.	New Zealand
See comments above	Norway
Serbia is in process of harmonisation of national legislation with EU legislation, so list given in Annex 6 of EU Regulation 1272/2008 is most convenient for Serbia regarding this question. Moreover, the EU classification and labelling inventory could be considered in this regards.	Serbia
Several countries/regional organisations have already made available their lists (e.g. via OECD eChemPortal). Whether or not classifications of a country/region are made applicable by other countries will among other factors depent on the transparency of the decision making process and the underlying data sets	Switzerland
Yes. But it may be difficult.	SE-EAQB
No, it is better to consider the classification lists from more countries/industries.	SRICI

Response	*Country/Organiz.*
Several countries/intergovernmental bodies have already made available their own list of classification (e.g.: European Union, New Zealand, Japan)	UN secretariat
This may be difficult 1) the underlying data may not be available and 2) there would also need to be a feedback loop for conflict resolution.	USA

Question 21:
Would you be willing to share your list with the UNSCEGHS?

Response	*Country/Organiz.*
We are currently developing a list of substances in the context of EU CLP implementation with a view to achieving consistency of classifications across our industry sector. It is envisaged that the list would be available on request.	AISE
Not applicable	ACI
Not applicable.	Argentina
Yes, the two lists mentioned above are publicly available (see question 5).	Australia
Yes	EIGA
Yes.	EU
Not applicable.	Canada
Yes, GESAMP has given its working group a mandate to make this known to a much wider group of potential users.	IMO
In promoting product stewardship, the oil and gas industry has developed data on recommended approaches for the classification of petroleum substances. To encourage harmonized and consistent classification, the regional petroleum industry associations are willing to share this information to assist in developing an international list of chemicals classified in terms of the GHS.	IPIECA
Downstream users of chemicals (i.e. manufacturers of mixtures), or their industry associations, typically do not maintain classification lists. Such users generally rely on the classifications communicated by their raw material suppliers. For paints or printing inks there are therefore no international or regional classification lists of substances used in these products.	IPPIC
Japan has already shared the list of classified substances according to the GHS.	Japan
Yes.	Korea
Yes. It is already available on the ERMA New Zealand website at: http://www.ermanz.govt.nz/hs/compliance/chemicals.html and through the OECD eChemPortal at: http://webnet3.oecd.org/echemportal/	New Zealand
ECHA inventory list will be available on internet for all users from all countries.	Norway
As Serbian list of classified substances will be fully harmonised with list given in Annex 6 of EU Regulation 1272/2008, we do not see the need for it.	Serbia
See answer to question 1	Switzerland
We would like share information and resources of chemicals safely management with UNECE and other countries.	SE-EAQB

Response	*Country/Organiz.*
We could share the list if we have it in future and there are no confidential data.	SRICI
It is already available	UN secretariat
Not applicable	USA

Question 22:
If there was an international classification list of chemicals, should it be a binding or non-binding classification list of chemicals?

Response	*Country/Organiz.*
It should be a non-binding list of classifications – producers or users should be allowed to self-classify if they have data that shows results that are contrary to the listed classification	AISE
The list must be non-binding in the absence of an international convention. It should also be non-binding when national or regional governments implement the GHS. While national, regional, or even globally available lists or databases of classifications for individual chemicals can provide a useful reference for classifiers and labelers, particularly those with fewer resources (e.g., small enterprises), use of such lists should be voluntary under all circumstances. Chemical producers or users should be allowed to self-classify, which is consistent with paragraph 1.3.2.1.2 of the GHS.	ACI
Non – binding, but with the option of each country to make it binding in their legislation.	Argentina
Since the GHS relies on self-classification by industry, if agreed, a list should be non-binding because manufacturers and suppliers have a duty to classify chemicals under workplace laws. The decision on whether any such list should be binding is in any case not a matter for the UNSCEGHS and would need to be a decision of each country.	Australia
Yes. It should be binding as a minimum classification that industry could override if they have evidence of data for more stringent classification	EIGA
Non – binding, but with the option for countries or regions to make it binding in their legislation.	EU
The question is premature until the questions of classification criteria and datasets are answered.	Canada
Making lists binding under existing chemicals conventions seems unrealistic.	IMO
A basic premise of the GHS is self-classification. According to the following statement in the GHS Purple Book (Section 1.3.2.1.2) "One objective of the GHS is for it to be simple and transparent with a clear distinction between classes and categories in order to allow for "self classification" as far as possible." It would be a major change in mid-course GHS implementation to change this fundamental GHS principle.	IPIECA
Views vary: some prefer that it be binding (as e.g. in the EU - Annex VI to Regulation 1272/2008), others prefer non-binding for guidance only. The consensus/harmonisation process mentioned in Question 20 would be a pre-requisite to introducing a binding list. However all respondents agreed that there should be clearly-defined processes for exceptions or to challenge the existing classification, if a country or organisation has	IPPIC

Response	*Country/Organiz.*
data casting doubt on the validity or applicability of a classification in the list.	
It depends on the state's law so far. International binding like TDG would be the best.	Japan
It is a problem that should be decided by each country, but binding may be better like UN RTDG.	Korea
It is probable that it would have to be non-binding in itself. It would only become binding if adopted into relevant national legislation or international agreements/conventions. It could be used in a similar way to the current Dangerous Goods list in the UNRTDG Model Regulations.	New Zealand
See comments above *(Note: refer to question 17)*	Norway
As we suggest using of harmonisation of classification and labelling of substances and the classification and labelling inventory given in Title V of EU Regulation 1272/2008 as model for development of this list, this list should not be legally binding at first step, but after the harmonisation is achieved maybe it could be binding in second step.	Serbia
A non binding list. Option to incorporate it in the Purple Book (Annex) and make it available for the Building Block Approach	Switzerland
Non – binding, but with the option of each country to make it binding in their legislation.	SE-EAQB
It should be binding so that better for pushing the harmonisation process.	SRICI
A binding list could exist only under a binding legal instrument. Developing a binding instrument (a convention) would raise the question of making the GHS itself of a binding nature, and so far this approach has not been supported by governments involved in the development of the GHS. This could also cause problems of inconsistencies with existing lists which are of mandatory application under legal instruments, and therefore some complications in international law. The same approach currently being used with the Dangerous Goods List could be applied to the GHS, i.e.: the recommended classification in the GHS would only become legally binding once transposed into the relevant national/regional/international legislation. The current system applied for transport of dangerous goods is rather flexible, it allows any interested government/organization to provide input, feedback and positive interaction, and proper coordination with all national/international regulatory bodies concerned leads to effective implementation without unnecessary constraints.	UN secretariat
At the time GHS was being developed, many U.S. stakeholders preferred a criteria-based system and not a new international classification body or list. U.S. OSHA is undergoing rulemaking on aligning its hazard communication standard with the GHS and has requested feedback on this issue.	USA

Question 23:
If there was an international classification list of chemicals, should it be for substances only or should it also include mixtures?

Response	*Country/Organiz.*
Should be for substances only	AISE
It should be for substances, since there are many times more mixtures than substances and classification of mixtures can be expected to be more variable than for substances. Regarding the latter, classification of mixtures is more complex (for example, allowing the use of bridging principles to determine the classification of a mixture) and can vary as a result of the use of options allowed under the GHS for mixture classification (for example, national authorities utilizing varying cut-off options	ACI
The initial focus should be on substances. The second step with the mixtures.	Argentina
A national decision is yet to be made on this issue, however in practical terms, the priority should be on substances only.	Australia
Substances only as a start. If there is agreement on the classification of the substances, the classification of the mixtures is less a problem	EIGA
For practical reasons (e.g., millions of possible mixtures, lifetime of a mixture on the market can be expected to be shorter than administrative measures to incorporate them into a list) the list should only include substances. Currently in the EU alone there are an estimated 50,000 substances on the market and possibly 2-10 million mixtures. However, extremely well defined and "conservative" widely used mixtures, like the coal- and oil derivatives, could be included. In addition, the TDG model whereby N.O.S entries cover mixtures and solutions that are not explicitly named may be an alternative model to consider if the list were to cover mixtures.	EU
The initial focus should be on substances.	Canada
Chemicals come in all forms, many are mixtures. GESAMP's list contains real chemicals as they are shipped and not just pure substances which are easier to study.	IMO
Existing classification lists are typically for substances and the GHS already contains criteria for the classification of mixtures. The feasibility of including true mixtures cannot be supported due to a number of practical considerations. Firstly, there is the issue of the extremely large number of mixtures. Furthermore, the details of mixture composition are often company-specific and company-confidential. Lastly, the same trade name may be applied to different mixtures supplied in different locations.	IPIECA
For substances only (but including complex substances which might otherwise be regarded as mixtures, e.g. defined petroleum refinery streams, mixed isomers of xylenes). It is neither feasible nor appropriate for an international organisation to classify or list the many millions of mixtures on the international market. Manufacturers should self-classify their mixtures using the substance classifications and their own knowledge of the product	IPPIC
It would be impossible for mixtures.	Japan

Response	*Country/Organiz.*
Initial priority should be on substances and generalized mixtures having cas number	Korea
It should be for chemicals only (ie. not mixtures) at least in the first instance.	New Zealand
It is not realistic to make a list of mixtures, since the composition of mixtures changes constantly.	Norway
As first step list containing only substances will be satisfactory (including of great number of mixtures produced all over the world would be very difficult), but in further steps it could be useful to consider inclusion of mixtures.	Serbia
The focus should be on substances for practical reasons (large number of mixtures on the markets with limited lifetime).	Switzerland
Mixtures are numerous and complicated, so the initial focus should be on substances.	SE-EAQB
It is not easy to classify all mixtures since the components may different and variable, unless the components and contents are fixed.	SRICI
It could be for both substances and mixtures. However, given the amount of mixtures currently being placed on the market it might be advisable to focus at least at a first stage on the classification of substances.	UN secretariat
Initially substances	USA

Question 24:
If there was an international classification list of hazardous chemicals, what would be the priorities on which chemicals to be added to that list (Rotterdam and/or Stockholm and/or UN list of chemicals, pesticides)?

Response	*Country/Organiz.*
The priority should be those substances of high concern already identified in several countries/regions. Another way of developing such a list could be to extract the substances entries from the UN Model Regulations Dangerous Goods List as a basis – these could then be reviewed on a hazard class basis (starting with the most severe hazards), updated as needed and other hazard classes/categories (i.e. those not covered by transport) added as necessary. It would be extremely useful if substances which have been evaluated and found to be not classified as hazardous according to GHS criteria, could also be included in an international list.	AISE
If there was an international classification list of hazardous chemicals, it should be restricted to substances listed under international treaties, such as the Rotterdam or Stockholm Conventions, since it would be expected that these substances would be well characterized and already have a defined dataset as a result of the deliberations that led to their being listed.	ACI
A starting point could be the substances produced and commercialized internationally in great quantities	Argentina
Countries could nominate priority chemicals following an agreed process, perhaps similar to that of the Stockholm Convention or Rotterdam Convention. The focus should be on commonly traded chemicals and ones where existing classifications are available, such as the UN dangerous goods list.	Australia

Response	*Country/Organiz.*
UN List of chemicals (Dangerous Goods List)	EIGA
Depending on the list to start with, it could be an ongoing process which self prioritises the substances to come and the hazard categories to cover. A first option could be that the initial priority should focus on widely traded/produced chemicals for which there is already a range of data available. As a starting point, the chemicals from the Rotterdam or Stockholm Conventions or from the OECD HPV chemicals program for which there is substantial industry-generated data should be considered. Another option is the UN dangerous goods list for transport that has the advantage of encompassing all possible chemicals and mixtures through general categories and might, given the necessary adaptations, serve as a foundation on which to build a harmonized list. The IARC list could also be as starting point with regards carcinogenicity.	EU
International Programme on Chemical Safety - International Chemical Safety Cards.	Canada
Chemicals in trade – the Conventions generally look after their own listed chemicals. Stockholm's list is short and does not cover many commodity chemicals.	IMO
Developing and maintaining an international classification list of hazardous chemicals will be very resource intensive. It will be important to prioritize resources to develop a list that has maximum impact and value for the resources expended. A first step would be to review existing national/regional classification lists to establish priority setting, since those lists already represent priorities for those countries. The first step in development of any classification list is the development and agreement on the criteria for inclusion of chemicals on the list. It would be logical to start with common hazardous high volume chemicals with multiple suppliers that are in international trade. To facilitate acceptance and have a propitious beginning, it would also be logical to start with the chemicals where there is already agreement among the existing lists. The UN TDG list contains the high volume chemicals most frequently found in commerce. However, a major issue is that materials currently listed by name in the UN Orange Book have NOT been reviewed against the new GHS criteria and their classifications updated. The International Chemical Safety Cards (ICSC) are peer-reviewed but it is by a select group of experts that represent limited input. There is no mechanism for input or conflict resolution. The ICSC are not updated frequently as new data become available. The data to support the classifications or explaining the rationale behind the classifications is not available. There is no mention of any impurities in the chemicals. Since many countries have not yet implemented the GHS for pesticides, it would seem that pesticides would not be a first priority for an international classification list of hazardous chemicals. Since at least one major country is not planning on implementing environmental hazards in the near future, it doesn't seem to make sense to have the Stockholm Convention/Persistent Organic Pollutants as a priority for an international classification list. It is recognized that there is an existing project on classifying the chemicals in the Rotterdam Convention. Since these chemicals/pesticides have been banned or severely restricted, such a list would have only limited usefulness and impact. The cost-benefit	IPIECA

Response	*Country/Organiz.*
of developing such a list should be considered. However, it could be useful to make these classifications available on the UN GHS website.	
Priority should be given to substances with the highest volume and hazard. Substances for which substantial test data already exists, and there is consensus on the classification between countries, would be the obvious first priority among these for inclusion in the international list.	IPPIC
Restricted or controlled chemicals by international treaties would be the priorities. Rotterdam and/or Stockholm and/or UN list of chemicals can be the way also.	Japan
The list would include UN list of chemicals by UN TDG, TLV list by ACGIH, and carcinogens by IARC	Korea
The initial priority should be on chemicals of high hazard and/or high risk as a result of the quantities used and the manner of use. Thus chemicals on various existing international lists/databases could be prioritised for initial GHS classification. Suggested existing lists (not necessarily in any order of priority) would include: - Chemicals covered by WHO/IPCS documents – ICSCs/EHCs/CICADs/Pesticides SDS, particularly WHO Class 1 pesticides - OECD HPV chemicals program - Rotterdam/Stockholm chemicals - UNRTDG Dangerous Goods List - IMDG Marine Pollutants	New Zealand
See comments above *(Note: refer to question 17)*	Norway
We find that priority would be to add High volume chemicals, as well as CMR chemicals	Serbia
A starting point could be chemicals that are frequently transported and/or manufactured/used in large amounts (transport list/OECD HPVC list) rather than PIC/POP chemicals that are already subject of existing international risk management measures	Switzerland
In our opinion, first priority should be UN TDG&GHS, secondly WHO/FAO recommended classification of pesticides and then Rotterdam and/or Stockholm.	SE-EAQB
First the UN list of chemicals, then pesticides, and Rotterdam and/or Stockholm.	SRICI
Given the number of chemicals, it would be unrealistic to think of an extensive list of chemicals at the very beginning. Therefore it is suggested to start with the list of chemicals which are most commonly subject to international trade, as listed in the UN Model Regulations on the Transport of Dangerous Goods. The classification contained therein could be checked, validated or corrected, and completed as necessary. This would already provide a very sound basis for harmonization. Then the exercise could continue with substances which have already been assessed by countries, or in particular the EU since they have already a rather extensive list, intergovernmental organisations, etc, but still on the basis that the classification proposed would have to remain under the control of the GHS Sub-Committee.	UN secretariat
Potentially start with an existing list such as the International Chemical Safety Cards	USA

Part III:
Additional comments/views received

A. Comments from (Organisation/Country): EU Commission/EU

Response compiled by the experts of the European Commission on behalf of the EU member states participating in the GHS Sub-Committee

NL view/ideas on the second part "future discussions on classification lists" of the UN SCE GHS Survey on Existing Classification Lists of Hazardous/Dangerous Chemicals

As a first step we propose to establish a world wide public inventory of the GHS classification of substances. This inventory should combine at substance level information on the GHS classification based on the following input:

Industry submissions of GHS classification for substances based on self classification.

Legally binding GHS classification of substances as included in a list of a Member State (or group of Member States).

Existing inventories/databases of GHS classifications of substances (e.g. EU CLP inventory).

The coordination of such a public inventory should be preferably done by the OECD. The final result will be a public database of substances with one or more GHS classifications. The world wide public inventory should indicate the origin of the classification (e.g. legally prescribed in Member State X or self classification).

As a second step parallel activities could be undertaken on the basis of the OECD world wide public inventory.

(a) Harmonization of the GHS classification of substances included in the UN dangerous good list for the GHS hazard classes used by transport. with coordination of UN TDG Subcommittee/OECD. Industry or Member States submit a proposal for a harmonized classification in case of different entries in the OECD inventory to the UN TDG Subcommittee. The existing subgroups for physical chemical properties and health end environmental properties will evaluate the proposal. The result will be a list containing of harmonized GHS classifications of substances to be used for transport and supply and use.

(b) Harmonization of the GHS classification for CMR properties of substances. Member States (or blocks of Member States) will submit proposals for a GHS classification to the OECD, who coordinates this exercise. Industry can submit additional information where appropriate. Evaluation should take place at the OECD level. The result will be a harmonized classification of the CMR properties of the substance at the OECD level. Member States (or blocks of Member States) will consider those classifications for implementation in their legislation or inventory.

(c) Harmonization of the GHS classification for non CMR properties of substances. Industry or Member States submit proposals for a GHS classification to the OECD, who coordinates this exercise.

Evaluation should take place at the OECD level. The result will be a harmonized classification of non CMR properties of substances at the OECD level. Member States (or

blocks of Member States) and Industry will consider those classifications for implementation in their legislation, own inventory or self classification.

B. Comments from (Organisation/Country): OSHA/USA

None of the databases or lists presented below are GHS-compliant.

National Toxicological Program (NTP) – provides a report on potential carcinogens. Criteria for these chemicals can be found at: http://ntp.niehs.nih.gov/index.cfm?objectid=03C9CE38-E5CD-EE56-D21B94351DBC8FC3

National Institute of Occupation Safety and Health (NIOSH) provides a links of publicly available chemical database:

The following databases provide detailed information on a variety of chemical agents associated with emergency response, including information on how to protect workers from exposures to these agents.

The Emergency Response Safety and Health Database (ERSH-DB): (http://www.cdc.gov/niosh/ershdb/)

Developed by NIOSH for the emergency response community, the ERSH-DB contains accurate and concise information on high-priority chemical, biological and radiological agents that could be encountered by personnel responding to a terrorist event.

NIOSH Pocket Guide to Chemical Hazards (http://www.cdc.gov/niosh/npg/default.html)

DHHS (NIOSH) Publication No. 2005-149The Pocket Guide is a source of general industrial hygiene information on several hundred chemicals/classes found in the work environment. Key data provided for each chemical/substance includes name (including synonyms/trade names), structure/formula, CAS/RTECS Numbers, DOT ID, conversion factors, exposure limits, IDLH, chemical and physical properties, measurement methods, personal protection, respirator recommendations, symptoms, and first aid.

Public Health Emergency Preparedness and Response (CDC) Chemical Agents List A-Z (http://www.bt.cdc.gov/Agent/agentlistchem.asp)

Facts, description and emergency response information from CDC related to the over eighty specific chemical agents (by category and alphabetically).

Acute Exposure Guideline Levels (AEGLs) (http://www.epa.gov/oppt/aegl/)

AEGLs are Environmental Protection Agency-recommended criteria and are intended to describe the risk to humans resulting from once-in-a-lifetime, or rare, exposure to airborne chemicals. The National Advisory Committee for the Development of Acute Exposure Guideline Levels for Hazardous Substances (AEGL Committee) is involved in developing these guidelines to help both national and local authorities, as well as private companies, deal with emergencies involving spills, or other catastrophic exposures.

International Chemical Safety Cards (http://www.cdc.gov/niosh/ipcs/icstart.html)

The International Chemical Safety Cards offer essential health and safety information on chemicals to promote their safe use. They are intended to be used at the "shop floor" level by workers and employers in factories, agriculture, construction and other places of work, being particularly useful in less developed areas and in small and medium size enterprises. They are also designed to be part of education and training activities.

Toxnet (http://toxnet.nlm.nih.gov)

A search engine accessing several databases on toxicology, hazardous chemicals, environmental health, and toxic releases provided by the National Library of Medicine.

ATSDR profiles (http://www.atsdr.cdc.gov/toxpro2.html)

By Congressional mandate, the Agency for Toxic Substances and Disease Registry (ATSDR) produces "toxicological profiles" for hazardous substances found at National Priorities List sites. These hazardous substances are ranked based on frequency of occurrence at NPL sites, toxicity, and potential for human exposure. Toxicological profiles are developed from a priority list of 275 substances.

ToxFAQs (http://www.atsdr.cdc.gov/toxfaq.html)

The ATSDR ToxFAQs™ is a series of summaries about hazardous substances, which contain information excerpted from the ATSDR Toxicological Profiles and Public Health Statements. Each fact sheet serves as a quick and easy to understand guide. Answers are provided to the most frequently asked questions about exposure to hazardous substances found around hazardous waste sites and the effects of exposure on human health.

Medical Management Guidelines (http://www.atsdr.cdc.gov/MHMI/mmg.html)

The Medical Management Guidelines (MMGs) for Acute Chemical Exposures were developed by ATSDR to aid emergency department physicians and other emergency healthcare professionals who manage acute exposures resulting from chemical incidents. The MMGs are intended to aid healthcare professionals involved in emergency response to effectively decontaminate patients, protect themselves and others from contamination, communicate with other involved personnel, efficiently transport patients to a medical facility, and provide competent medical evaluation and treatment to exposed persons.

Toxicology Interaction Profiles (http://www.atsdr.cdc.gov/interactionprofiles/)

A series of documents called Interaction Profiles are being developed for certain priority mixtures that are of special concern to ATSDR. The purpose of the Interaction Profile is to evaluate data on the toxicology of the "whole" priority mixture (if available) and on the joint toxic action of the chemicals in the mixture in order to recommend approaches for the exposure-based assessment of the potential hazard to public health.

http://www.cdc.gov/niosh/topics/emres/chemagent.html#search

OSHA/EPA Occupational Chemical Database

OSHA and EPA jointly developed and maintain this database as a convenient reference for the occupational safety and health community. This database compiles information from several government agencies and organizations.

https://www.osha.gov/web/dep/chemicaldata/#target

EPA Information

Although not comprehensive, the information presented below contains lists of chemicals developed in response to regulatory requirements of the U.S. Environmental Protection Agency.

EPCRA §§302, 304, 313: emergency planning & release reporting

- EPCRA Sections 302 & 304 - "extremely hazardous substances" subject to EPCRA's emergency planning & release reporting regulations (40 CFR Part 355) -- http://www.access.gpo.gov/nara/cfr/waisidx_01/40cfr355_01.html

- EPCRA Section 313 - "toxic chemicals" subject to EPCRA's Toxics Release Inventory (40 CFR Part 372): -- http://www.access.gpo.gov/nara/cfr/waisidx_01/40cfr372_01.html
- http://www.epa.gov/emergencies/content/epcra/index.htm

CERLCA§103: emergency release reporting regulations (40 CFR Part 302)

- "hazardous substances"- http://www.access.gpo.gov/nara/cfr/waisidx_01/40cfr302_01.html
- http://www.epa.gov/superfund/policy/release/rq/index.htm

CAA§112(r): Chemical Accident Release Prevention Plan (40 CFR Part 68) (AKA: the risk management plan)

- "regulated substances" -- http://www.epa.gov/emergencies/content/rmp/index.htm

EPA's List of Lists

- This document cross-references the lists of chemicals subject to EPCRA §§302, 304, 313; CERLCA§103; and CAA§112(r).
- http://yosemite.epa.gov/oswer/lol.nsf/homepage

TSCA§8(b): TSCA Inventory

- http://www.epa.gov/oppt/newchems/pubs/invntory.htm