

## **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**

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Item 6 of the provisional agenda

**Development of guidance on the application of GHS criteria**

### **Update of the IPIECA Guidance on the Application of Globally Harmonized System (GHS) Criteria to Petroleum Substances**

**Transmitted by the International Petroleum Industry Environmental  
Conservation Association (IPIECA)**

#### **Background**

1. Various industry sectors are working to ensure their members are familiar with the GHS framework. Outreach efforts have occurred in areas such as the metals and mining, petroleum, and chemicals industries. These industries aim to ensure awareness of members and provide guidance and interpretation relevant to substances and mixtures specific to their industries.
2. The concept of sector guidance is consistent with the aims of the UN Strategic Approach to International Chemicals Management (SAICM). SAICM goals include promoting industry participation and responsibility; establishing a clearing house for information on chemical safety to optimize the use of resources; strengthening the exchange of technical information among the academic, industrial, governmental, and intergovernmental sectors; and other goals related to chemicals management.
3. IPIECA published the *Guidance on the Application of Globally Harmonized System (GHS) Criteria to Petroleum Substances* in 2010. It has been IPIECA's experience that, while the GHS principles are robust, there are complexities and idiosyncrasies associated with their application to specific materials such as petroleum substances. The IPIECA GHS guidance suggests arranging petroleum substances logically in groups of "similar" substances (product groups), which facilitates read-across for purposes of consistent classification and minimizes unnecessary testing. The IPIECA guidance also informs the user that there are certain hazardous constituents, which should be considered in classification decisions when there is limited data on the complete substance. Without this relevant information, the uninformed might view all petroleum substances as conventional mixtures and base all classification decisions solely on constituent information.

## Benefits of the guidance

4. IPIECA believes that utilization of the guidance will result in global harmonization of hazard classification of petroleum substances broadly traded in international commerce. Additional benefits of the guidance are:

- (a) Application of the “grouping” or “category” concept, resulting in a full use of available data, thereby minimizing the need for animal testing;
- (b) Transparent use of GHS principles for the classification of petroleum substances, a type of Unknown or Variable Composition, Complex Reaction Products or Biological Materials (UVCBs);
- (c) Consistent and reliable classification of petroleum substances, resulting in appropriate hazard communication aiming to reduce the risks arising from the storage and handling of petroleum substances; and
- (d) Consistent classification reduces costs for industry and countries.

5. IPIECA encourages countries and industry to fully utilize this guidance in the application of the GHS criteria to petroleum substances. By providing relevant sector-specific guidance, the hazard classification results of petroleum substances should be globally consistent regardless of regional differences in the implementation of GHS or classification of individual petroleum substance constituents.

## Status of the guidance

6. There is a link to the 2010 IPIECA GHS guidance on the UN GHS website under GHS guidance, Section 2: Sector-specific guidance at:

<http://www.ipieca.org/resources/good-practice/guidance-on-the-application-of-globally-harmonized-system-ghs-criteria-to-petroleum-substances/>

7. IPIECA is now working on a revision of the guidance to ensure the guidance reflects current research and scientific developments and is consistent with updated versions of the GHS.

## Action requested

8. The Sub-Committee is invited to submit comments for the revision of the 2010 IPIECA GHS Guidance. Comments on the guidance should be sent to Derek Swick at [swickd@api.org](mailto:swickd@api.org).

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