

## **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**

**28 September 2010**

**Twentieth session**

Geneva, 7–9 December 2010

Item 4 (a) of the provisional agenda

**Implementation of the GHS – Implementation issues**

### **Survey on existing classification lists of hazardous/dangerous chemicals**

**Transmitted by the World Health Organization (WHO)**

#### **Background**

1. The Globally Harmonized System of Classification and Labelling of Chemicals (GHS) was designed to provide a globally harmonised chemical classification system, based on physico-chemical, health and environmental hazard criteria.
2. As hazard classification is highly technical in nature, and requires a certain background and level of expertise to perform it accurately, classification often presents significant challenges particularly in developing countries. Some Governments and/or international organisations have chosen to develop lists of classified chemicals, primarily for substances that are commonly produced and used or which have specific hazardous properties. These lists of classified chemicals often develop from a particular starting point, and have a history well before the development of the GHS: for example, the UN dangerous goods list was developed by the UN subcommittee of the Transportation of Dangerous Goods specifically focusing on the transportation of chemicals. It was noted by the UN Institute for Training and Research (UNITAR) that a comparison between developed GHS classification lists revealed inconsistencies in the classification results for a certain number of given substances. This may lead to varying hazard communication which is exactly what was intended to be prevented by the GHS.
3. The Sub-Committee of Experts on GHS (SCE GHS), as part of the implementation of the GHS, is considering how to achieve harmonised classification of substances, and whether there is a need for the development of an international list of hazardous chemicals classified in terms of the GHS. The Implementation Work Group (IWG) established by the UN SCE GHS has been tasked with starting the process of examining how harmonised classification of substances can be achieved.
4. The first step in this process is to ascertain whether countries would find such a list useful and what lists currently exist which could be used as the basis for an international list. Work has already commenced on developing a list of chemicals controlled under the Rotterdam Convention classified in terms of the GHS.
5. As the chair of the IWG of SCE GHS, Australia has agreed to collect and consolidate information on the current stage of development of such lists by Governments and provide the information to the UN SCE GHS. This survey is purposed to collect that information.

6. Information provided in your response to this survey will be collated and provided to the UN SCE GHS members. The consolidated information may identify individual respondents, unless you request that your country's responses be kept confidential.

## Instructions

7. This survey is open for response from members and observers of the UN Sub-Committee of Experts on the GHS and the Sub-Committee of Experts on the Transport of Dangerous Goods. # **Industry associations – please note you should fill in only Questions 17 onwards, as the first set of questions are relevant to governments only.**

8. All submissions must be accompanied by a completed cover sheet which is provided as an attachment in this document.

9. Submissions made on the response form provided here should be emailed to Dr Paul Taylor, Safe Work Australia: [Paul.Taylor@safeworkaustralia.gov.au](mailto:Paul.Taylor@safeworkaustralia.gov.au) by COB Friday 26<sup>th</sup> August 2010.

10. The form for the submission of comments is prepared in MS-Word format and should be saved as such (please do not save as pdf). Please use clear language when commenting.

11. Additional rows can be added to the table to accommodate more comments [Click in the last cell on the last line and press <tab>].

## Submitter

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## Confidentiality

Please indicate if you wish your submission kept confidential

Yes  No

If you wish to make a submission that contains some confidential information, please ensure the material is clearly marked 'IN CONFIDENCE'

## Survey for existing international classification lists of chemicals

Questions 1-16 are for government agencies only. Industry associations should fill in the questions from 17 onwards.

### A. Area: Classification Lists

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

WHO is an International Organization (an agency of the United Nations) rather than a government agency, but our situation is comparable in many ways to a national government, rather than an Industry association

WHO publishes the "Recommended Classification of Pesticides by Hazard" which includes GHS classifications. This is available on the internet at [http://www.who.int/ipcs/publications/pesticides\\_hazard/en/index.html](http://www.who.int/ipcs/publications/pesticides_hazard/en/index.html) and also in hard copy via WHO publications

GHS classifications are also available in International Chemical Safety Cards - <http://www.who.int/ipcs/publications/icsc/en/index.html>.

**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**

The "Recommended Classification of Pesticides by Hazard" classifies pesticides according to a WHO system, but the hazard categories are largely aligned with GHS.

International Chemical Safety Cards currently show EU Classifications in addition to GHS.

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

The lists are maintained by WHO.

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

WHO (on behalf of partners in other international organizations).

**Question 5: Is it publicly available?**

Yes

[http://www.who.int/ipcs/publications/pesticides\\_hazard/en/index.html](http://www.who.int/ipcs/publications/pesticides_hazard/en/index.html)

or via WHO publications as a priced publication.

International Chemical Safety Cards are available on the Internet (in multiple languages) - <http://www.who.int/ipcs/publications/icsc/en/index.html>.

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

No

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

Pesticides - in house by WHO based on data taken from international evaluations of pesticides.

International Chemical Safety Cards - by experts working with WHO in a process of international peer review.

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

For pesticides - within the publication [http://www.who.int/ipcs/publications/pesticides\\_hazard/en/index.html](http://www.who.int/ipcs/publications/pesticides_hazard/en/index.html)

International Chemical Safety Cards follow the GHS as published.

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

References to the source data are presented for each pesticide.

International Chemical Safety Cards do not list references for reasons of limited space.

**B. Area: GHS Classification Lists**

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

Pesticides in the Recommended Classification publication.

Industrial chemicals and pesticides in the International Chemical Safety Cards.

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

Pesticides - yes for acute oral toxicity - alongside the WHO classification. A few instances for dermal toxicity. No other GHS classifications.

For International Chemical Safety Cards - yes - according to GHS as published.

**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?**

Approx. 900 pesticides for acute oral toxicity.

Approx. 150 International Chemical Safety Cards (out of 1600 in total).

**C. Area: Resources to maintain classification lists**

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

WHO relies on voluntary donations to support this work.

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

Yes - the pesticides list is updated every few years.

International Chemical Safety Cards are updated periodically and new chemicals are added. New or updated International Chemical Safety Cards will include GHS.

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

Yes.

**Question 16: Describe how it will be developed?**

The next Pesticides revision will definitely include new pesticides. Additional classification categories may also be presented depending on resources.

GHS classifications are added to International Chemical Safety Cards at update, and to all new International Chemical Safety Cards.

**Industry associations – please note you should fill in only Questions 17 onwards**

**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?**

WHO would like to refer to lists published by other countries and organizations for the benefit of users in countries with limited resources. WHO does not have the resources to publish full GHS classifications for all pesticides.

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

Users in developing countries with limited resources for their own regulatory system.

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

WHO does not have the resources to publish full GHS classifications for all pesticides, or all chemicals.

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

WHO supports the wide dissemination of classification information

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

Yes.

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

WHO recommendations on classifications are non-binding on countries.

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

WHO only plans to cover substances at this time (for resource reasons).

**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)?**

No response.

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