

**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 5 (a) of the provisional agenda

Implementation of the GHS

development of a list of chemicals classified in accordance with the GHS

Possible Ways Forward on the Global List

Transmitted by the expert from the United States

Introduction

1. The Sub-Committee has been studying the possibility of developing a global list of chemicals classified in accordance with the GHS since 2008. It has done considerable work in this regard, including a survey of international classification lists, developing a set of guiding principles, a pilot classification project, and a list comparison exercise.

2. Over the last two sessions there has been vigorous debate in the Sub-Committee over the direction of the project. In considering a working paper summarizing the work on the issue to date (ST/SG/AC.10/C.4/2017/4), there were diverging views on the next step forward, though there was a strong desire by most participants to move forward in some fashion. In particular:

- There are concerns by some about the resources and capacity needed.
- There was recognition that there is already substantial work being done to classify substances by competent authorities and non-governmental entities, and a hope that that work could be harnessed or built upon to develop a global list.
- There was considerable interest in the question of how to choose substances that might be included in a list, but little consensus on how to do so.
- There were concerns about how a global list might impact competent authorities that have their own mandatory lists.
- In addition to the prospect of creating a harmonized list, there is a hope that by engaging in the global list effort, the Sub-Committee might be able to improve the GHS itself by learning about any difficulties in applying the criteria.

See ST/SG/AC.10/C.4/68 paras 52-54.

3. The informal correspondence group discussed possible ways forward in a teleconference on 22 February 2018. There was significant interest in that teleconference in conducting further investigation into divergences between existing classification lists. As a first step, it was considered that a list of existing GHS classification lists could be created. This list of lists would compile information about each list, including how the list was developed, whether the rationale and data underlying the classification are available, whether the list was legally binding, and

what building blocks were adopted in the implementation for which the list was prepared.

4. The United States has questions about whether to further pursue the exercise of reviewing classification differences among existing lists is the best way forward in this project. It seems to set up a comprehensive list is comparison project, but we already know from previous work correspondence group and the OECD that there are significant disagreements between existing lists. (See ST/SG/AC.10/C.4/2017/4, para 6.) While a study of the reasons for divergences on classifications could provide useful insights that might lead to improvements in the GHS, significant effort would be involved in such an exercise, and its ultimate contribution towards the global list project is uncertain.

5. Before undertaking such work, the United States suggests further discussion on possible alternative ways forward that might more quickly reach the goals of the global list project. For example:

(a) One success of the global list project has been in the articulation of guiding principles. Perhaps building on the discussion in February, a way forward to be for the Sub-Committee to recognize existing classification lists that meet the guiding principles or conversely where they deviate from these principles.

(b) In that regard, based the information shared by WHO, classifications underlying the International Chemical Safety Cards appear to be developed in accordance with the guiding principles, though additional resources are needed to make the classifications and rationales publically available. If the Sub-Committee believes that those classifications satisfy the guiding principles, perhaps it might consider ways to find the resources needed to make the classifications and rationales supporting them public.

(c) Alternatively, rather than aiming for an extensive list of harmonized classifications, the Sub-Committee might approach the problem as a troubleshooter, addressing particular classifications of concern that are brought to its attention. This would build on another success of the global list: the pilot classification project. While it has been suggested that the resources required by that process for a large list of chemicals could be prohibitive, the process might be justified to address a discrete number of sufficiently important differences in classification.

6. This list is not intended to be exhaustive, but rather suggestive of potential other ways forward that might more immediately address the issues that led the Sub-Committee to study the potential for a global list. The Sub-Committee is invited to consider these alternatives further.
