

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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PROGRAMME OF WORK FOR THE BIENNIUM 2007-2008

Miscellaneous changes to the GHS Text

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

Background

1 Between 21 August and 21 October 2006 the European Commission held a Stakeholder Consultation on a “Commission staff proposal” for a Regulation to implement the GHS in the EU. Existing legislation on classification and labelling in the European Union had developed a methodology that allows the classification of petroleum substances (which are UVCBs¹) and that takes into account that, because of the variable composition, the same substance may have to be classified or not. The Commission staff proposal for a Regulation to implement the GHS foresaw that this methodology would be maintained. The European petroleum industry welcomes this decision, because it recognises that the approach has proven to be a practical and workable solution. Other member states have similar provisions for petroleum substances in their existing legislation.

2 The GHS currently lacks a suitable methodology for the classification of petroleum substances. There is a risk that during implementation of the GHS by UN member states several inconsistent approaches will be developed or no suitable approach to the classification of petroleum substances will be implemented. This would create yet another barrier to the harmonisation of classification.

Introduction

3 Petroleum substances are UVCBs, comprising of >600 CAS numbers. Global health and environmental issues concerning petroleum substances are dealt with by IPIECA. IPIECA members are national and regional petroleum industry associations and oil companies. IPIECA believes that the 2007-2008 Biennium provides a unique opportunity to develop a harmonised approach to the classification of petroleum substances at UN level. Approaches in and experiences with existing legislation in member countries would provide a basis for discussion.

Proposal

4 IPIECA proposes that in the next Biennium, an item of work should be that a consistent and harmonised approach to the classification of petroleum substances is developed.

5 IPIECA offers to assemble an overview of existing methodologies as a starting point for more detailed work on a proposal. IPIECA suggests establishing a working group that develops a proposal for a harmonised approach to the classification and labelling of petroleum substances. IPIECA volunteers to lead the working group.

¹ Substances of unknown and variable composition, complex reaction products or biological materials.