

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**

2 December 2022

Forty-third session

Geneva, 7-9 December 2022

Item 4 (a) of the provisional agenda

**Implementation: Possible development of
a list of chemicals in accordance
with the Globally Harmonized System**

Preliminary analysis of global chemical classification list survey for non-governmental organizations

**Transmitted by the experts from the United States of America and
Canada on behalf of the informal correspondence group**

1. The global list informal correspondence group (ICG) conducted the “United Nations GHS Global Classification List Survey”, administered by the Co-chairs of the ICG, the United States of America and Canada, with the assistance of the U.S.’s consultant, in October/November 2021 (INF.13 to the forty-first session).
2. This informal document presents the non-governmental organizations’ (NGOs’) preliminary analysis of the survey results in the Annex to this document.
3. A correction was made to the NGOs’ raw survey results (INF.20/Add.3 to the forty-second session) for Guiding principle (c) cells H5 and I5 to change the gray shading to an entry of “N/A”. Furthermore, for the IFRA, additional information was received for a general question (cell AJ5) and a clarification was provided for the response to Guiding principle (c) Question 7 (cell I7). The updated spreadsheet with the raw survey results is enclosed as an addendum to this informal document and circulated as INF.29/Add.1 (Excel file).
4. A brief background on the survey can be found in the annex to this document while a detailed background on the survey can be found in informal document INF.30 (forty-third session).

Annex

Preliminary analysis of global chemical classification list survey for non-governmental organizations

The global list informal correspondence group conducted a GHS Global Classification List Survey of international classification lists that follow the GHS in October/November 2021. The purpose of the survey was to understand how the lists were developed, how they are implemented, and how they compare to the “guiding principles.” The guiding principles are six principles developed by the Sub-Committee related to the possible development of a global list of chemicals classified in accordance with the GHS. See ST/SG/AC.10/C.4/48, Annex III, p. 18 for the guiding principles.

Sixteen responsible authorities, including competent authorities (10), UN bodies and UN specialized agencies (3), and non-governmental organizations (3), responded to the survey. The information provided here is an overview and analysis of the responses received by non-governmental organizations related to their chemical lists.

The non-governmental organizations that responded to the survey are:

- CESIO (Surfactants Europe) - CESIO recommendations for the harmonized classification and labelling of surfactants
- Concawe - Hazard Classification and Labelling of Petroleum Substances in the European Economic Area
- International Fragrance Association (IFRA) - International Organization of the Flavor Industry (IOFI) Labelling Manual

A number of general and/or background questions were asked, as well as questions related to each of the six guiding principles (Guiding Principles (a) – (f)). The non-governmental organizations’ responses to these questions, as well as any additional narrative responses, are provided below. Table cells that have been greyed out indicate the question was not applicable while an entry of N/A indicates that no response was received. The respondents’ contact information and other private information have been omitted. Answers are reflective of the list at the time the survey was completed.

General background questions*What is the GHS implementation status? (Select all that apply)*

	CESIO	Concawe	IFRA
GHS is legally implemented in one or more possible sectors (that is, the GHS has been adopted through a legally binding instrument, such as a law, decree, regulation, mandatory standard, etc. and the instrument is in force.)			
GHS is implemented on a voluntary basis in one or more possible sectors (that is, the GHS has been incorporated into a non-mandatory instrument, such as voluntary standards, recommendations, guidance, etc. and/or is voluntary.)			
GHS implementation is in transition* to legal implementation (*this excludes transition to a more recent version of the GHS)			
Other (please provide brief explanation below)			
Not implemented			
Not applicable (organization)			
Not applicable (other, please provide brief explanation below)			

If necessary, please provide a brief explanation of your response in the space below.

Concawe – GHS is implemented in the EU by the CLP Regulation (EC) No 1272/2008. It is implementing certain building blocks (not all GHS hazard categories), and has additional EU specific Hazard statements. In addition, the Concawe C&L Report 22 / 20 “Hazard-classification-and-labelling-of-petroleum-substances-in-the-EuropeanEconomic-Area” gives the voluntary, sector specific self-classification recommendations for petroleum refining and downstream industry, focusing on UVCB petroleum substances.

The CLP Annex VI does not cover the complete CLP classifications for UVCB petroleum substances, whereas the Concawe C&L Guidance does. Therefore, this sector-specific Concawe Guidance document provides the most comprehensive currently available summary of the C&L of the UVCB petroleum substances in the EU/EAA, based on their active REACH registration dossiers at the end of 2021. This adds value for the recommendation of our organisation, as it is more comprehensive than the legal text.

If the GHS has been implemented, what sectors has the GHS been implemented for? If the GHS implementation is in transition, what sectors will the GHS be implemented for?

CESIO	Concawe	IFRA

'Other' Responses:

Question not applicable

If the GHS has been implemented, which version of the GHS is currently implemented? If the GHS implementation is in transition, which version of the GHS is planned to be implemented?*

CESIO	Concawe	IFRA

**this excludes transition to a more recent version of the GHS*

Please provide a brief explanation if more than one version was selected

CESIO	
Concawe	
IFRA	

Does this country or organization have a classification list?

CESIO	Concawe	IFRA
Yes	Yes	Yes

Does this list align with the GHS or the jurisdiction's implementation (past or present) of the GHS?

CESIO	Concawe	IFRA
Partially. CESIO recommendation is mainly according to EU CLP, however aspects of GHS are also considered in the current version.	Partially. GHS is implemented in the EU via the CLP Regulation (EC) No 1272/2008. It is implementing certain building blocks (not all hazard categories), and has additional EU specific Hazard statements.	Yes

What authority or organization is responsible for this list (for example, administration of this list, making this list available)?

CESIO	CESIO (Surfactants Europe)
Concawe	The EU CLP Regulation is maintained by the European Commission. Our response is focusing on the 2020 version of the Concawe C&L Report 22 / 20 "Hazard classification and labelling of petroleum substances in the European Economic Area", which is downloadable via this link (currently being updated for 2021): https://www.concawe.eu/wp-content/uploads/Hazard-classification-and-labelling-of-petroleumsubstances-in-the-European-Economic-Area-%E2%80%93-2020.pdf
IFRA	IFRA and the International Organization of the Flavor Industry (IOFI). This list is called the "Labelling Manual" and it is a voluntary initiative aiming at advise on a consistent implementation for the Fragrance & Flavour industry, by applying GHS criteria consistently using & evaluating all available and qualifying data. This Labelling Manual is voluntary but strongly recommended.

Who has performed the classifications (for example, technical experts internal to the authority or organization responsible for this list, a third-party contracted company)?

CESIO	Technical experts internal to the authority or organization responsible for this li
Concawe	Other: Technical experts of the member companies
IFRA	Technical experts internal to the authority or organization responsible for this list

Please provide the name of the authority, organization, or company responsible for this list.

[This question was intended to be presented with the option:

"Technical experts external to the authority or organization responsible for this list" as "Please provide name of the authority, organization or company" to capture the external experts who performed the classifications]

CESIO	
Concawe	
IFRA	

Provide a brief summary of the classification process, as relevant.

CESIO	The CESIO CLP recommendations are based on available information (i.e. studies) from all member companies. The derived classifications for the polymeric surfactant groups is based on weight of evidence approach. For the non polymeric surfactant groups updates from ECHA are taken into account.
Concawe	The C&L implementation recommendations of REACH registered substances are summarised, based on the latest data and C&L in the active registration dossiers and complemented with recommendations based on existing legislation and will be regularly updated (especially ATPs of the SCL Regulation and partially harmonised C&L of the substances in CLP Annex VI). The work is performed in Task Forces by technical experts, followed by a formal validation and reviewing process before publication.
IFRA	The IFRA-IOFI GHS Task Force recommendations are based on the provisions and criteria laid down in the GHS Purple Book by the United Nations on the Globally Harmonized System of Classification and Labelling of Chemicals. This TF is responsible for issuing the Labelling Manual.

What is the purpose of this list?

CESIO	Concawe	IFRA
Harmonize classification		Harmonize classification
Assist stakeholders with classification	Assist stakeholders with classifications	Assist stakeholders with classifications
	Other	

'Other' responses:

CESIO	
Concawe	support implementation and improve compliance and quality of members' C&L notifications and Safety Data Sheets
IFRA	

Is this list publicly available or restricted?

CESIO	Concawe	IFRA
Publicly available	Publicly available	Publicly available ¹

1. IFRA and IOFI members continue to access the file directly on the internal library and non-IFRA-IOFI members receive the Labelling Manual via email upon request.

Is access to this list free of charge?

CESIO	Concawe	IFRA
Yes	Yes	Yes

What is the web link for this list (if available)?

CESIO	https://www.cesio.eu/images/content/210526-Cesio-CL_Recommendations_2021-Final.pdf
Concawe ¹	https://www.concawe.eu/wp-content/uploads/Hazard-classification-and-labelling-of-petroleum-substances-in-the-European-Economic-Area-%E2%80%93-2020.pdf
IFRA	

1. Web link provided by the ICG co-chairs that are not affiliated with the NGO.

Language options for lists

	<i>Is the list available in English?</i>	<i>Is the list available in another language?</i>	<i>Please list other language(s)</i>
CESIO	Yes	No	
Concawe	Yes	No	
IFRA	Yes	No	

Are external classification lists considered in the process of classification?

	<i>External classification lists</i>	<i>Classification list(s) considered</i>	<i>Are there other relevant chemical classification lists to be noted for this country/jurisdiction or organization?</i>
CESIO	Yes	In parallel, any relevant updates from GHS and ECHA regarding classifications are taken into account.	No
Concawe	Yes	The partially harmonised EU classification of CLP Annex VI	No
IFRA	Yes	The GHS TF considers the EU list of harmonized classifications (Annex VI of the EU CLP) and the classifications of the REACH registration dossiers on the ECHA website but they do not necessarily agree with any of them.	No

Additional Information (if applicable)

Concawe – Yes, an update was received for a general question. The response has been incorporated accordingly.

IFRA –

Is this list publicly available or restricted?

Administering requests on our public-facing website became too much of a burden so we stopped offering it through that channel.

IFRA and IOFI members continue to access the file directly on our internal library and non-IFRA-IOFI members receive it via email upon request.

We are working on an automated solution, but we haven't implemented it yet. We hope to solve this very soon and to have the Labelling Manual available on our website.

Guiding principle (a): The process for developing and maintaining a global list must be clear, transparent and follow the principles of the GHS. Opportunities should be provided for stakeholders to provide input as well as mechanisms for expert review, conflict resolution and updating the list when new significant data or information become available

Question 1 - In the process leading to changes to this list (for example, adding or removing chemicals, changing classification information for a substance), is there an opportunity for stakeholders to provide input?

	CESIO	Concawe	IFRA
Yes or No	Y	Y	Y

Question 2 - If yes, please indicate the stakeholders involved with a brief explanation of their role. For example, are the relevant stakeholders consulted on changes to this list? Do changes to this list require approval from stakeholders (for example, in a council or committee)?

CESIO	The CESIO recommendation is aligned within CESIO member companies. The review of information is done by qualified experts from member companies. After the experts in the task force complete their work with all recommendations, the document undergoes final approval in the Technical and Regulatory Affairs (TRA) Committee.
Concawe	The work is performed in Task Forces by technical experts of member companies, followed by a formal validation of the expert group, management group, reviewing and approval of reviewing team and science committee before publication. Data are based on the C&L of active substance registration dossiers, complemented with recommendations based on existing legislation and will be regularly updated.
IFRA	The global fragrance and flavor industries receive the annual labeling manual in draft form for consultation in November of each year. Consultation lasts approximately one month. All questions, comments; etc., are discussed and finalized and the final, updated labeling manual is distributed globally during the first week of January, every year

Question 3 - Is there an opportunity for public consultation?

	CESIO	Concawe	IFRA
Yes or No	N	Y	N/A

Question 4 - Do the classifications have a mechanism for expert review?

	CESIO	Concawe	IFRA
Yes or No	Y	Y	Y

Question 5 - If yes, are the classifications subject to an internal peer review? (for example, within the competent authority or organization responsible for administering this list)

	CESIO	Concawe	IFRA
Yes or No	Y	Y	Y

Question 6 - If yes, are the classifications subject to an external peer review? (for example, outside the competent authority or organization responsible for administering this list)

	CESIO	Concawe	IFRA
Yes or No	N	N	N

Question 7 - Does this list have a mechanism for conflict resolution?

	CESIO	Concawe	IFRA
Yes or No	Y	N	Y

Question 8 – *If yes, is this mechanism considered to be part of the process of establishing classifications on this list?*

	CESIO	Concawe	IFRA
Yes or No	Y		Y

Question 9 – *'Other' Responses*

Question not applicable

Question 10 – *If yes, please provide a brief summary of this mechanism*

CESIO	Classification is based on scientific data and studies and aligned between the experts.
Concawe	
IFRA	The GHS TF includes company experts who resolve classification discrepancies. Additionally there is the consultation period in November which involves a broader audience (see previous comment). Differing opinions are resolved between the industry experts,

Question 11 – *Is there a mechanism for updating the classifications when new significant data or information become available?*

New and significant information is any information that changes the classification of the substance or mixture and leads to a resulting change in the information provided on the label or any information concerning the chemical and appropriate control measures that may affect the SDS (GHS paragraph 1.4.7.2.1).

	CESIO	Concawe	IFRA
Yes, No	Y	Y	Y

Question 12 – *If yes, is this mechanism real time updating (for example, if significant new data that would result in a classification change are identified, is the mechanism for revising the classification initiated, as opposed to waiting for the next cyclical update)?*

	CESIO	Concawe	IFRA
Yes, No, Other	N	Other	Other

Question 13 – *'Other' Responses*

CESIO	
Concawe	Annual updates
IFRA	Industry members notify the GHS TF for classification changes whenever there is new data related to their substances. If it is a significant new change (CMR, for example) the association would send interim communication to the F&F industries ahead of publication of the annual LM.

Question 14 – *If yes, is this mechanism cyclical in nature (for example, every two years, if relevant)?*

	CESIO	Concawe	IFRA
Yes, No, Other	Y	Y	Y

Question 15 – *'Other' Responses*

CESIO	
Concawe	
IFRA	

Question 16 – *If yes, please state the time period for the application of this mechanism:*

CESIO - A review is done in regularly, every 2-3 years, depending on needs and resources.

Concawe – Annual updates

IFRA - The Labelling Manual is updated annually with new/revised assessments

Question 17 – *If yes, is it possible for stakeholders to initiate updates to this list?*

	CESIO	Concawe	IFRA
Yes, No, Other	Y	N	Y

Question 18 – *'Other' Responses*

CESIO	
Concawe	
IFRA	

Question 19 – *Additional Information (if applicable):*

None reported

Guiding principle (b): All GHS hazard categories and classes must be included in the global list of classified chemicals.

Question 1 – For a country/jurisdiction, which implementation of the GHS are the classifications based on? For an organization, which version of the GHS are the classifications based on?

Other			
Rev. 9			
Rev. 8			
Rev. 7			
Rev. 6			
Rev. 5			
Rev. 4			
Rev. 3			
Rev. 2			
Rev. 1			
1 st edition			
Revision Number	CESIO	Concawe	IFRA

Question 2 – For a country/jurisdiction, which implementation of the GHS are the classifications based on? For an organization, which version of the GHS are the classifications based on? 'Other' Responses

CESIO - For new classifications and reviews, the latest version of GHS is used at the time of classification/assessment.

IFRA – The GHS TF always follow the last version of the GHS document

Question 3 – Please provide a brief explanation if more than one version was selected.

CESIO	
Concawe	
IFRA	

Question 4 – Are all hazard classes and categories from the GHS version used included for the classifications?

	Yes	No	Other
CESIO			x
Concawe			x
IFRA	y		

Question 5 – Other responses

CESIO - See CESIO list (and footnotes on pp. 28, 39, 61, 78) to see which classes are used for CESIO

Concawe - The EU Chemical legislation (CLP) is a regional implementation of the GHS framework, and future deviations are expected to follow after the Chemicals Strategy on Sustainability.

Question 6 – For which hazard classes and categories from the GHS version used were classifications **not** performed?

Physical hazard classes/categories that were not adopted

	Explosives	Flamm. gases	Aerosols	Chemicals Under Press	Oxidizing gases	Gases under pressure	Flammable liquids	Flammable solids	Self reactive	Pyrophoric liquids	Pyrophoric solids	Self-heating	Water/emit flamm gas	Oxidizing liquids	Oxidizing solids	Organic peroxides	Corrosive/metals	Desensitized explosives
CESIO																		
Concawe																		
IFRA																		

Health hazard classes/categories that were *not* adopted

	Acute Toxicity			Skin corrosion/ irritation	Serious eye damage/ irritation	Sensitization		Germ cell	carcinogenicity	Reproductive toxicity	STOT		Aspiration
	oral	inhalation	dermal			skin	respiratory				SE	RE	
CESIO													
Concawe													
IFRA													

Environmental hazard classes/categories that were *not* adopted

	Hazardous to the aquatic environment	Hazardous to the ozone layer
CESIO		
Concawe		
IFRA		

Question 7 – Does this list include hazards not addressed in the GHS?

	Yes (Y)/No (N)
CESIO	N
Concawe	Y
IFRA	N

Question 8 – If yes, please provide a brief description of the hazards.

CESIO	
Concawe	EU has additional specific EUH hazard statements, such as EUH066
IFRA	

Question 9 - Please provide a reference for the applied classification criteria (for example, the regulation or relevant version of the GHS, as applicable).

CESIO	CESIO has published its updated recommendations for classification and labelling both for human health and for environment according to the CLP regulation (GHS of the EU) together with UN GHS classification.
Concawe	Regulation (EC) No. 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No. 1907/2006. Official Journal of the European Union No. L353, 31.12.2008 and as further amended by ATPs 1 – 17.
IFRA	

Question 10 - Additional Information (if applicable)

None reported

Guiding principle (c): Only substances, as defined by the GHS, will be included in the global list of classified chemicals.

Question 1 - Does this list include: (Select all that apply) Substances (as defined by the GHS)? Mixtures (as defined by the GHS)? Other chemical compounds outside the scope of the GHS definition of substance and mixture?

	CESIO	Concawe	IFRA
Substance (as defined by GHS)			
Mixture (as defined by GHS)			
Other chemical compounds outside the scope of the GHS definition of substance and mixture			

Question 2 - Other Chemical Compounds outside the scope of the GHS definition of substance and mixture (please provide definitions, as applicable)

CESIO - Mainly substances (some of them might fall also for some companies under other/ UVCB).

Question 3 - Does this list include only prioritised chemicals?

	Yes	No
CESIO		
Concawe		
IFRA		

Question 4 - If yes, is it limited to specific hazards?

CESIO – No, **IFRA** - No

Question 5 - If yes, please list and describe the hazards:

Question not applicable

Question 6 - If yes, is it limited to high-volume chemicals?

CESIO – N/A, **IFRA** - No

Question 7 - If yes, what other criteria are applied?

IFRA – IFRA and IOFI periodically organize volume of use surveys among the membership. Chemicals in the Labelling Manual list substances with a volume of use equal or above 1 ton; if additional tox and ecotox data is available or if relevant for our F&F industry they can be prioritized on a case by case basis.

Question 8 - What is the total number of chemicals on this list?

CESIO	see attached list
Concawe	200
IFRA	1659

Question 9 – Optional: How many substances (as defined by the GHS)?

Concawe – 200

Question 10 – *Optional: How many mixtures (as defined by the GHS)?*

Concawe - 0

Question 11 – *Optional: How many compounds excluded from the GHS definition of substances and mixtures?*

No responses

Question 12 - *Additional Information (if applicable):*

IFRA - A clarification was received pertaining to a guiding principle (c) question. The response has been updated accordingly.

Guiding principle (d): All substances must be accurately identifiable and described for each entry (e.g. including Chemical Abstracts Service Registry Numbers (CAS numbers), the UN numbers assigned under transport of dangerous goods regulations where assigned/applicable, and relevant impurities).

Question 1 – How are the chemicals identified on the list?

CESIO	Concawe	IFRA
Common name	Common name	Common name
Chemical Abstract Service (CAS) Registry Number	Chemical Abstract Service (CAS) Registry Number	Chemical Abstract Service (CAS) Registry Number
		International Union of Pure and Applied Chemistry (IUPAC) name
		UN number (under UN Recommendations on the Transport of Dangerous Goods Model Regulations)
	Regional Coding Scheme	
Other	Other	Other

Question 2 – Other identifiers?

CESIO	Concawe	IFRA
EC-Number where applicable	REACH registered UVCB petroleum substances included in CLP Annex VI (partial classification), as defined by CAS, EC and several group/category/substance descriptions.	FEMA number, JECFA number, EINCES number, REACH List number

Question 3 - How are chemicals described for each entry on this list? For example, for chemicals on this list are relevant impurities named, if applicable?

CESIO	No, impurities are not named.
Concawe	UVCB petroleum substances are defined by their origin, process and some technical parameters (but not the exact composition). They are rather process streams than well-defined substances, and therefore described as UVCBs under REACH.
IFRA	The chemicals are described by name, with accompanying synonyms and relevant cross-reference numbers as indicated above

Question 4 - Additional Information (if applicable)

None reported

Guiding principle (e): The data sets forming the basis for the chemical classification must be referenced with the classification. The source of the information must also be electronically available, and publicly accessible. The data should be derived using test methods that are scientifically sound and validated according to international procedures.

Question 1 - Are documents from the decision-making process electronically available and publicly accessible?

	CESIO	Concawe	IFRA
Yes			
No			
Partially			

Question 2 - If partially, what are the limitations?

CESIO	Further background data is collected and stored internally together with the classification table and any notes of the discussion leading to the decision. The documents are not publicly accessible however, in order to protect confidentiality.
Concawe	
IFRA	

Question 3 - Is the dataset on which the classification is based referenced with the classification?

	CESIO	Concawe	IFRA
Yes			
No			
Partially			

Question 4 - If partially, what are the limitations?

CESIO	As noted above, further background data is collected and stored internally where appropriate.
Concawe	
IFRA	Acute oral, dermal, inhalation numbers indicated in LM

Question 5 - Is the dataset on which the classification is based electronically available and publicly accessible? If partially, what are the limitations?

	CESIO	Concawe	IFRA
Yes		X	
No			
Partially	X		X

Question 6 - If partially, what are the limitations?

CESIO	As noted above, further background data is collected and stored internally where appropriate. It is not publicly accessible however, in order to protect confidentiality.
Concawe	
IFRA	The dataset is available for the F&F industry, but not to the public

Question 7 - Are the data available in sufficient detail for an independent assessment to be conducted?

	CESIO	Concawe	IFRA
Yes			
No			
Partially			

Question 8 - How does the classification process take GHS paragraph 1.3.2.4.3 into consideration, with the understanding that the classification process can be complex and available data from testing or studies will be dependent on the generally accepted standards of good scientific practice at the time the test or study was conducted?

CESIO	The CESIO recommendations do comply with these standards.
Concawe	The classification is based on the OECD and EU Testing Guidelines and standard EU classification criteria established by the regulations. However, due to the specific nature of petroleum substances, many standard methods are not applicable and sector specific methods and recommendations need to be applied.
IFRA	Our classification process is based on internationally recognized scientific principles, they are scientifically sound and internationally recognized.

Question 9 - Additional Information (if applicable)

None reported

Guiding principle (f): The global list of chemical classifications will be non-binding. As with the GHS itself, countries will have the option to make the list binding if they adopt it through their legislative and/or regulatory process. Furthermore, the development of a global list is compatible with the GHS principle of self-classification.

Question 1 - Are the classifications legally binding or non-binding?

CESIO	Non-binding
Concawe	Non-binding
IFRA	Non-binding

Question 2 - Please provide the reference for the legislation

CESIO	
Concawe	
IFRA	

Question 3 - Additional Information (if applicable)

None reported