

## **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  
classified in accordance with the Globally Harmonized System**

### **Status update and proposed work plan for 2023-2024 global list informal correspondence group**

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

#### **Background**

1. The Sub-Committee has been studying the possibility of developing a global list of chemicals classified in accordance with the GHS in order to facilitate GHS implementation since 2008 (ST/SG/AC.10/C.4/2008/22 paragraph 4.4 (g)).
2. Reasons for exploring the development of a global list include furthering the goals of the GHS to ensure that chemical users have “consistent and appropriate information” worldwide (see para. 1.1.1.3 of the GHS), aiding small and medium-sized chemical manufacturers and suppliers and countries without the resources to develop classifications (see para. 1.1.1.1 to 1.1.1.3 of the GHS), and improving chemical classification accuracy (ST/SG/AC.10/C.4/2017/4, paragraph 14). Sub-Committee members have also expressed concern that developing a global list would require substantial resources, may unnecessarily duplicate work already done at the competent authority level, and could undermine the credibility of a competent authority’s binding list and create potential legal issues related to enforcement (ST/SG/AC.10/C.4/2017/4, paragraph 15).
3. The global list informal correspondence group (ICG)’s current program of work consists of three work streams (see ST/SG/AC.10/C.4/78 paragraph 44 and ST/SG/AC.10/C.4/2020/17). Items (a) and (b) of Work stream A on the current program of work are to compile information on widely-used lists that follow the GHS and compare them to the guiding principles developed by the Sub-Committee (see ST/SG/AC.10/C.4/48, Annex III).
4. The ICG has made considerable progress related to Work stream A. In furtherance of Items (a) and (b) of Work stream A, the global list 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. The purpose of the survey was to identify existing classification lists that follow the GHS and enable the comparison of these lists with the guiding principles (see ST/SG/AC.10/C.4/48, Annex III).
5. The ICG received sixteen responses to the survey, ten of which were from competent authorities, three of which were from UN bodies/UN specialized agencies, and three of which were from non-governmental organizations (NGOs).

- (a) The competent authorities that responded are: Australia (Hazardous Chemical Information System); Canada (Hazardous Products Regulations Classifications); China (Catalogue of Hazardous Chemicals); European Union (EU Harmonized C&L (Annex VI to Classification, Labelling and Packaging Regulation and opinions of the Committee for Risk Assessment)); Japan (GHS Classification Results by the Japanese Government); Malaysia (Industry Code of Practice Part I List of Classified Chemicals); New Zealand (Hazardous Substances and New Organisms Chemical Classification Information Database); Republic of Korea (National Chemicals Information System), United Kingdom of Great Britain and Northern Ireland (Great Britain mandatory classification and labelling list (GB MCL List)); and Vietnam (National Chemical Inventory).
- (b) The UN bodies/UN specialized agencies that responded are: International Labour Organization (ILO)/World Health Organization (WHO) (International Chemical Safety Cards); Sub-Committee of Experts on the Transport of Dangerous Goods, maintained by the UN Secretariat (Dangerous goods list); and WHO (The WHO Recommended Classification of Pesticides by Hazard and guidelines to classification).
- (c) The NGOs that responded are: Concawe (Concawe Report – Hazard Classification and Labelling of Petroleum Substances in the European Economic Area); European Committee of Organic Surfactants and their Intermediates (CESIO) (CESIO recommendations for the harmonized classification and labelling of surfactants); and International Fragrance Association (IFRA) (IFRA-International Organization of the Flavor Industry Labelling Manual).

6. At the 41<sup>st</sup> session in December 2021, the co-chairs of the ICG presented the preliminary results from the survey and invited feedback from the Sub-Committee on how the ICG should evaluate and present the survey results (see ST/SG/AC.10/C.4/82, paragraphs 33 and 34). It was agreed that the survey results would be presented in three separate spreadsheets: the first comparing competent authority lists; the second comparing UN bodies/UN specialized agencies lists; and the third comparing NGO lists.

7. Following the 41<sup>st</sup> session, the co-chairs developed the three spreadsheets (INF.20/Add.1, INF.20/Add.2, INF.20/Add.3, 42<sup>nd</sup> session) and at the 42<sup>nd</sup> session in July 2022, presented a preliminary analysis of the competent authority responses (INF.20, 42<sup>nd</sup> session). At the 42<sup>nd</sup> session, the Sub-Committee recommended that the ICG provide similar analysis of the responses received from United Nations bodies/specialized agencies and NGOs at the 43<sup>rd</sup> session (ST/SG/AC.10/C.4/84, paragraphs 48 and 49).

8. There was also general agreement that the survey results should be made widely and publicly accessible, such as through a journal article and/or the GHS implementation webpage. The representative of UNITAR indicated that one of the most frequently asked questions during capacity building events is the availability of GHS classification lists and data and volunteered to contribute to spreading this information (ST/SG/AC.10/C.4/84, paragraphs 50 and 51).

9. Since the 42<sup>nd</sup> session, the three spreadsheets with the raw survey results and the preliminary analysis of the competent authority responses have been made available, by the secretariat, on the Chemical's assessment webpage under the GHS implementation and guidance section of the UNECE website. Additionally, corrections have been identified for the competent authorities' results and the preliminary analysis of the competent authority responses and corresponding results spreadsheet have been updated (INF.27 and INF.27/Add.1, 43<sup>rd</sup> session). Furthermore, the NGOs' results spreadsheet has been updated to reflect a correction that was identified, a clarification that was provided and additional information that

was received (INF.29 and INF.29/Add.1, 43<sup>rd</sup> session). The UN bodies' and UN specialized agencies' results spreadsheet has also been updated to reflect the receipt of additional information that was not previously indicated (INF.28 and INF.28/Add.1, 43<sup>rd</sup> session).

10. The co-chairs presented preliminary analyses of the UN bodies/UN specialized agencies and NGO survey responses at an ICG meeting held via Microsoft Teams on November 8, 2022, and intend to present these analyses at the 43<sup>rd</sup> session (INF.28, INF.29). After that presentation, the ICG will have completed items (a) and (b) from Work stream A.

11. At the November 8, 2022 meeting, the ICG also discussed the program of work for 2023-2024. Working group members voiced support for finalizing the survey analyses into a single report and publicizing it. Representatives from the OECD provided information about how the final survey analysis could be publicized on the OECD's eChemPortal via a link to the GHS implementation page. Working group members also expressed support for further analysis of the lists, including identifying discrepancies between classifications as proposed in Work stream B. Working group members recognized that Work stream C is a long-term project that will take many years but supported keeping it on the ICG's program of work. While Work stream C of the 2021-2022 program of work included the potential development of a list based on specific hazards of concern (ST/SG/AC.10/C.4/2020/17), it was raised that such an approach is not entirely consistent with the Guiding principles. Guiding principle (b) states "All GHS hazard categories and classes must be included in the global list of classified chemicals;". The working group therefore did not carry that aspect of Work stream C into the 2023-2024 proposed program of work.

12. The Sub-Committee is invited to consider the program of work described below.

## **Proposed program of work for 2023-2024**

### **Work stream A: Finalize and publicize survey analysis**

- (a) Finalize survey analysis, complete any outstanding corrections.
- (b) Publicize the working group's survey analysis through UNITAR, the GHS implementation page, and/or the OECD's eChemPortal.
- (c) Publish a journal article outlining the GHS chemical classification list survey results and the working group's analysis.

### **Work stream B: Continue to research and analyse the existing classification lists**

- (a) The Sub-Committee could further evaluate the classifications on a subset of the lists (e.g., by hazard class or category).
- (b) This could allow the Sub-Committee to better understand the degree of consistency or inconsistency among chemical classifications. This could result in greater transparency, provide the opportunity to identify problems or patterns related to current classifications (which could be referred to the Practical Classification Issues working group to clarify the criteria or give further guidance on how to apply the criteria), and/or provide a basis for considering the option in Work stream C.

### **Work stream C: Consider developing a classification list limited to chemicals of concern**

The Sub-Committee could develop a limited classification list based on chemicals of concern (e.g., high-volume chemicals, chemicals that are classified differently).