

**Ad Hoc Expert WG: Environmental Hazard
Canadian Implementation of GHS
September 9, 2004
Meeting Summary**

Participants:

Kim Headrick (Chair)	Christina Cowan	Dave Bennett	Pat Doyle
Ruth Brydon	Alison McLaughlin	Jim McGeer	Jim Skeaff
Lisa Wardell	Abbey Klugerman	Bob Sebastien	Linda Toy
Brenda Everson (Secretariat)			

Regrets: Greg Lawson David Lamarche

Purpose:

- 1 To introduce topic of Environmental Hazard GHS labelling
- 2 To provide overview on current situation in Canada and internationally
- 3 To discuss approaches and options

Reference material:

Thought Starter document

GHS Purple Book, (Part 3 & Annex 8)

<http://www.unece.org/trans/danger/publi/ghs/officialtext.html>

- 1 Clarification of the role of the Ad Hoc Expert Working Group:
 - this working group was formed because the environmental hazard GHS labelling cuts across all sectors
 - this working group will report their recommendations to the sectoral working groups
 - questions to be addressed:
 - should consumer restricted chemicals, pest control products and workplace chemicals be subject to the environmental hazard classification criteria and labelling provisions of the GHS and if so, which classification categories should be covered and how: under which pieces of legislation?
- 2 An update on the multi-stakeholder sectoral working group activities were presented. Pest Control Products, Consumer Chemicals and WHMIS have initiated discussions to look at GHS classification criteria in comparison with their existing systems. Transport Canada will be working in tandem with the United Nations Subcommittee on Transport of Dangerous Goods. Meeting summaries will be posted on the GHS web site.
www.healthcanada.ca/ghs or www.santecanada.ca/sgh

An update on US activities was presented. Details can be found at the following URLs:

- Bill introduced by Senator Enzi
<http://congress.org/congressorg/webreturn/?url=http://enzi.senate.gov>
 - refer to News Releases, July 2004 and title:
 - [Enzi initiates new safety workplace bill -- July 22 \(includes related documents\)](#)
- Federal Register Notice from the Environmental Protection Agency on White Paper for GHS Implementation Planning Issues
http://www.epa.gov/oppfead1/cb/csb_page/updates/ghs-labels.htm
- Occupational Safety and Health Administration (OSHA) Comparison document
<http://www.osha.gov/dsg/hazcom/GHSOSHAComparison.html>

An update on EU activities was presented. EU officials have indicated that the GHS will be implemented at the same time as REACH (the new chemicals legislation) comes into effect. The target date is 2006.

- 3 The Thought Starter Document was reviewed and discussed.
- Clarification on the relationship between CEPA 99 and GHS and whether there was overlap
 - determining CEPA toxicity is an outcome of risk assessment, whereas GHS is hazard information. Note when a chemical is designated as a "CEPA toxic", acute and chronic aquatic toxicity are not distinguished.
 - Additional Considerations were discussed
 - compliance issues and enforcement of labelling
 - costs/benefits of having environmental labelling
 - training of users
 - disposal of product
 - size of labelling effort
 - package size

Action Items:

- All to think about whether there is a demonstrated need for environmental labelling and the number of products that would be affected.
- Health Canada and Environment Canada to seek legal opinion on legislative authority for environmental labelling on products and opinions on options if authority is not present.
- Environment Canada, WHMIS and Consumer Restricted Chemicals to explore why there currently is no environmental labelling in their legislation and regulatory framework. Was it a decision or simply not part of the discussions during legislative or regulatory development process.

- Health Canada to look at the cost/benefit when more clearly defined options are developed and include the implications of environmental labelling implementation, such as training etc.
- At next meeting, Transport Canada to give update on how the International Marine Dangerous Goods, International Marine Organization and the UN Subcommittee of Experts on the Transport of Dangerous Goods are linked and how they work together.

Next meeting

- Tuesday, 19 October, 10am-Noon ET.