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Jernkontoret

PROPOSAL TO REVISE CLP WITHOUT DELAY TO IMPLEMENT THE GHS CLASSIFICATION AND HAZARD STATEMENT ADDRESSING POTENT GREENHOUSE GASES

INTRODUCTION

Jernkontoret is the Swedish iron and steel producers' association representing companies producing highly specialised steel products with a wide variety of applications. More than 10 iron and steel producers are represented in Jernkontoret's chemicals network regularly discussing topics related to chemicals regulations.

During the practical work of risk assessing chemicals, the members of the network have noticed a gap regarding the actual and communicated climate hazard, which complicates the process of risk assessment as well as the subsequent steps of chemicals handling.

Therefore, the members of the network propose revising CLP without delay to introduce the GHS Revision 11 hazard classification for contribution to global warming and the associated hazard statement H421: Harms public health and the environment by contributing to global warming.

In case there is a possibility of shortening the wording of the Hazard statement, the following options could be considered: '(Very) potent greenhouse gas' or 'Contributes strongly to climate warming'.

CURRENT SITUATION

Substances with high Global Warming Potential (GWP) lack clear hazard communication in CLP.

Gases with high GWP are used in industrial settings (e.g. high-voltage switchgear, electricity distribution, cooling, process industry, metals industry), and emissions are possible due to leakage and maintenance. An example of a gas with extremely high GWP is SF_6 with GWP 23 500, which can be compared to CO_2 with GWP 1.

Lack of hazard statement for GWP is a regulatory gap that limits the ability of industry, downstream users, and consumers to make fully informed decisions regarding the environmental impacts of chemicals. Moreover, it gives an impression of harmless gas despite the serious climate impact. As no hazard communication connects the actual handling of the gas with its consequence on climate, there is a risk that GWP may not be captured in the regular risk assessments at workplaces, which is illustrated in the example below.

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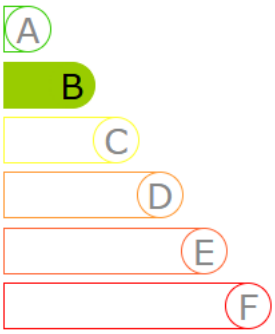
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EXAMPLE

Example from a chemicals management system, which automatically classifies SF_6 as hazard level “B” where A is least dangerous for health and the environment and F is most dangerous:



B - Acceptable product. However, keep in mind that the product contains substances that may be harmful to humans and / or the environment. You must make a risk assessment of the product.



The reason for ranking is as follows:

- The product contains substances with hygienic limit values.
- The product is classified as Gas under pressure.

The hygienic limit value (= OEL = Occupational Exposure limit) exists but is very high for SF_6 as it is established due to its properties to displace oxygen when high amount of SF_6 gas is released into the air.

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