

Bringing GHS into Seveso and the Seveso Review

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Background

- Seveso linked to CPL
- New EU Reg, known as GHS – due to come in on 1 June 2008
- Will force change to Seveso
- European Commission announced Review of Seveso, driven by:
 - Need for change to align with GHS
 - 5 years since amendments in 2003

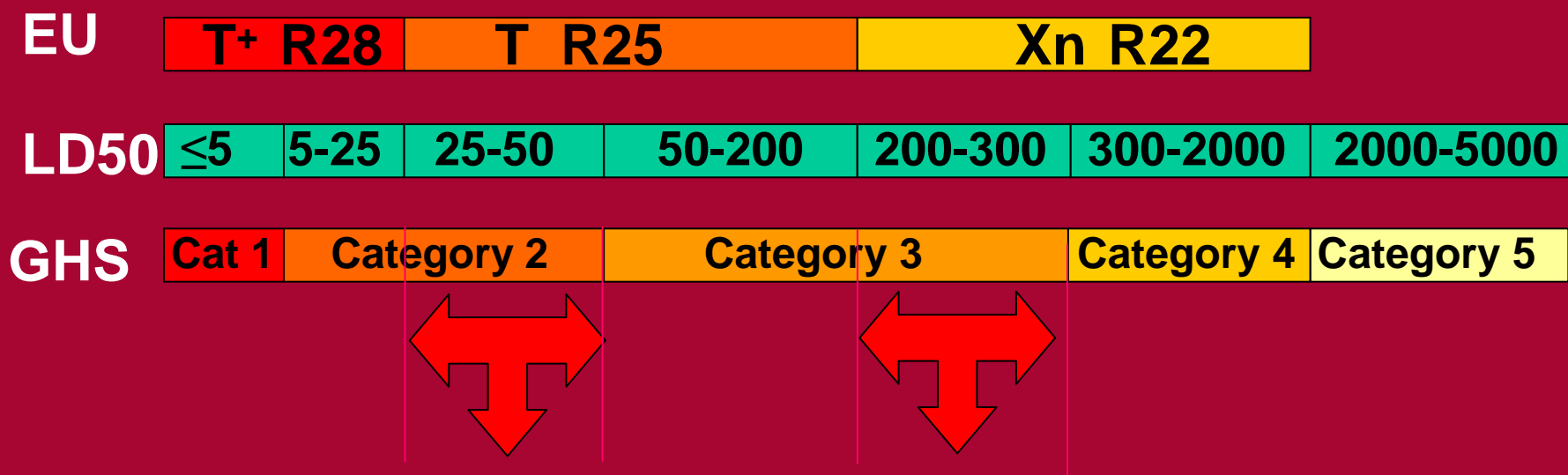
Bringing GHS into Seveso – aims

- EC wants to ensure at least the same level of protection to man & environment throughout the community
- UK wants minimal change to overall scope:
 - No increase unless justified by safety
 - No decrease if there remains the risk of a major accident
 - The link between CPL & Seveso to be as clear & straight forward as possible for industry to apply & regulators to enforce
 - Admin burden kept to a minimum

Bringing GHS into Seveso – progress so far

- Member states held informal meetings to look at implications of GHS for Seveso
 - Established alignment options for toxicity
 - Identified phys-chem issues
- European Commission set up TWG – first meeting in Feb
 - Set scene for TWG
 - Broke into 2 groups to look at:
 - toxicity
 - Phys-chem

Toxicity



No 1:1 correlation – significant implications for Seveso toxic/v.toxic categories

Bringing GHS into Seveso – Toxicity – alignment options

- Dual classification
- CPL alignment
- Simple alignment
- Precautionary alignments
- Moderate alignment

Toxic alignment options

4 alignment options

Simple

T+ = GHS 1

T = GHS 2

Named
substances

Technical
criteria

Precautionary 1

T+ = GHS 1&2

T = GHS 3

Precautionary 2

T+ = GHS 1

T = GHS 2 & 3

Moderate

T+ = GHS 1

T = GHS 2 &
some 3

Some new
qualifying
quantities

UK Position

- Prefer the simple alignment:
 - GHS Class 1 = Very Toxic (T+)
 - GHS Class 2 = Toxic (T)
- named substances with appropriate thresholds for low molecular weight gases - to avoid the problem of gases such as ammonia, hydrogen fluoride going out of scope
- Technical filter

Bringing GHS into Seveso – Toxicity – technical filter

- What it is
- How it could work – one off or on-going
- Member States' views
- European Commission's view
- Industry's views
- Lack of data

Why not be Precautionary?

The precautionary alignments

(T+ = GHS class 1 & 2, T = GHS class 3)

(T+ = GHS class 1, T = GHS class 2 & 3)

- Increases the number of sites covered by the most stringent duties.
- Increases the scope of the Directive bringing in substances (and the sites that use them) such as
 - Sodium dodecyl sulphate used in shampoo, shower gel etc
 - Calcium dipropionate used processed foods, confectionaries and animal feeds

Bringing GHS into Seveso – Phys-chem hazards

- Generally good correlation between Seveso & GHS
- GHS introduces some new groups eg self-heaters
- Member States carrying out research, UK leading on flammable aerosols

Bringing GHS into Seveso – Flammable aerosols

- Considering the question: is there a need for a new category in Seveso for flammable aerosols
- Outcome of research
- Expect discussion at next TWG
- General view on flammables in aerosols is that they present a major hazard risk

Bringing GHS into Seveso – Environmental hazards

- Good alignment with CPL and GHS
- Issue of mixture

Seveso Review – What's happening

- F-Seveso – results due in July
- Next study – Effectiveness of requirements imposed on public authorities – due to start in Autumn
- Study on administrative burdens – report due end of 2008
- Impact assessment?

Time scales

- 2 further meetings of TWG – June & Sept
- TWG to report to CCA – Spring 2009
- Conclusions from Reviews expected - mid 2009
- EC proposals for change – Autumn 2009
- Amendments to coincide with transition period for new GHS reg – Dec 2010 for substances

Looking forward

- Need industry help to look at Cat 3 toxics
- Will be consulting with industry
 - Informally
 - Formally
- Contributions welcome

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Conclusions

- HSE is working with other Government departments, international partners and industry reps.
- Looking to achieve an appropriate regulatory regime with minimal change
- Transparent & straightforward for industry to apply

