



**Hazardous  
Substances**

ENVIRONMENTAL RISK MANAGEMENT AUTHORITY  
NGĀ KAIWHAKATŪPATO WHAKARARU TĀIAO



Amendment to Group Standards:

## **Extension of Alternative Labelling Provisions**

**Environmental Risk Management Authority -  
Assessment of Matters to be Considered**

Consultation

**January 2010**

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# Background

ERMA New Zealand wishes to consult on its assessment of the matters that are required to be considered before issuing or amending group standards.

On 20 January 2009, ERMA received an application to amend the group standard labelling provisions. Further details of the proposed amendment are provided in the following section.

In accordance with section 96C(1)(h)(i) of the HSNO Act, the proposed amendment was publically notified on ERMA New Zealand's website on 16 April 2009 and in the four main metropolitan newspapers on 22 April 2009.

Various government departments, Crown entities and interested parties, which in the opinion of the Authority would be likely to have an interest in the application, were notified of the receipt of the application and provided with an opportunity to comment or make a public submission on the application.

Submissions closed on 5 June 2009. Twenty-four submissions were received. Six parties requested to be heard. The summary of submissions can be found at:

[http://www.ermanz.govt.nz/resources/publications/pdfs/Summary%20of%20Submissions%20-%20FINAL%20\\_2009.07.23\\_.pdf](http://www.ermanz.govt.nz/resources/publications/pdfs/Summary%20of%20Submissions%20-%20FINAL%20_2009.07.23_.pdf)

The Agency prepared a consideration paper to aid the Committee in its decision making process. This is also available at:

[http://www.ermanz.govt.nz/resources/publications/pdfs/2009.09.16%20ACCORD%20Consideration%20Paper%20-%20FINAL%20\\_2009.10.20\\_.pdf](http://www.ermanz.govt.nz/resources/publications/pdfs/2009.09.16%20ACCORD%20Consideration%20Paper%20-%20FINAL%20_2009.10.20_.pdf)

A hearing was held on 12 November 2009. Four parties and the applicant presented oral submissions to the Committee.

In accordance with section 96C(1)(h)(ii) of the Act, it is now necessary to undertake further consultation on the Authority's assessment of the matters required under subsection (1)(a), (b), (c), (d) and (e) in relation to the group standards as proposed to be amended.

## The Amendment

An amendment to group standards has been requested by ACCORD Australasia Ltd ("the applicant"). The proposal affects a number of the group standards published by ERMA New Zealand on 1 July 2006 (see **Appendix A**).

The applicant is seeking an extension to the alternative compliance provisions for labelling of substances captured by group standards. One of the alternative compliance provisions for labelling allows exemption from labelling requirements of a group standard if a substance complies with:

1. The relevant current labelling requirements of Australia, USA, Canada, the European Union, and

2. The group standard requirement to provide the product name, 24 hour emergency number, information on the New Zealand importer, supplier or manufacturer and directions for use.

This alternative compliance provision expires on 31 December 2010. The wording of the alternative compliance conditions is as follows:

*Alternative compliance measures for labelling*

*(X) The requirements of subclauses (1) to (15) do not need to be met if a substance complies with-*

- (a) the relevant identification provisions in the Hazardous Substances (Identification) Regulations 2001, the Hazardous Substances (Emergency Management) Regulations 2001 and the Hazardous Substances (Disposal) Regulations 2001; or*
- (b) a code of practice approved by the Authority under section 78 of the Act that specifies requirements equivalent to those set out in subclause (1) to (15); or*
- (c) the UN Globally Harmonised System of Classification and Labelling of Chemicals (GHS) and the requirements of subclause (2); or*
- (d) the relevant current labelling requirements of Australia, USA, Canada, the European Union or any other country as approved by the Authority, as if the substances were for sale or supply in those countries, and the requirements of subclause (2).*

*(X+1) Subclause (X) (d) expires with the close of **31 December 2010**.*

The applicant's proposal is to substitute the current expiry date of **31 December 2010** with the date **31 December 2020**.

## Amendment Options

As a result of its review of the application and the information that was received via submissions and the hearing into the application, the Authority has identified a number of options regarding the proposed amendment. These are:

1. No amendment, the expiry date remains at 31 December 2010.
2. Amending the expiry date, for which a variety of options were identified:
  - a. Extending the expiry date to 31 December 2020, as proposed by the applicant.
  - b. Extending the expiry date to 1 June 2015, the EU transitional period expiry date.
  - c. Extending the expiry date to 31 December 2016, the Australian workplace chemicals transitional period expiry date.
  - d. The removal of an expiry date. The provision would be retained, but have no expiry date.

# Notification Requirements

## **Notification of the Authority's Assessment of the Matters required under section 96C(1)(a), (b), (c), (d) and (e) of the HSNO Act**

Section 96C(1)(h) of the HSNO Act states that:

*Before issuing or amending group standards under section 96(B), the Authority must,-*

- (h) in accordance with section 53, publically notify—*
  - (i) the proposal to issue or amend (as the case may be) group standards; **and***
  - (ii) its assessment of the matters required under subsection (1)(a), (b), (c), (d) and (e) in relation to the group standards as proposed to be issued or amended.*

The requirements of section 96C(1)(h)(i) were addressed by the public notification of the proposal on 16 April 2009. The notification of the proposal met all the requirements of sections 53 to 61 of the Act.

The requirements of section 96C(1)(h)(ii) are yet to be addressed. This consultation document and the consultation process that will follow will address these requirements.

Public notification of the assessment is achieved by:

1. by placing a public notice in the four main metropolitan newspapers; and
2. providing information on the ERMA New Zealand website, including the date for receipt of submissions by the Authority.

In accordance with section 54 of the HSNO Act, any person may make a written submission on the application, which includes the Authority's assessment of the amendment. Section 54(2) of the Act requires that a submission:

- (a) shall state the reasons for making the submission;*
- (b) may state any decision sought; and*
- (c) shall state whether the person making the submission wishes to be heard.*

# Assessment of the Matters required under section 96C(1)(a), (b), (c), (d) and (e) of the HSNO Act

## Matters to be considered by the Authority

Before a group standard can be issued or amended, the Authority must be satisfied that:

1. the group standard is a more efficient and effective way of managing the risks of all the substances in the group; and
2. all the substances or products in the group standard have a similar nature, are of a similar type, or have a similar circumstance of use, such that the risks of the substances or products can be effectively managed by one set of conditions.

The Authority's assessment of these matters is considered in the following sections:

### Efficiency and Effectiveness

Before amending the group standard, sections 96C(1)(a), (b) and (c) of the HSNO Act require the Authority to be satisfied that:

*amending the group standard is a more efficient and effective way of managing the risks of all the hazardous substances in the identified group*

### Efficiency

The Authority considers that amending the group standards (Appendix A) to extend the expiry date for the provision which allows the use of labels that comply with the relevant current labelling requirements of Australia, USA, Canada, the European Union or any other country as approved by the Authority is a more efficient way of managing the risks of hazardous substance in group standards, as many imported products have labels that already meet these requirements.

Allowing the provision to expire in 2010 would require labels to comply with either the HSNO regulations or the UN Globally Harmonised System of Classification and Labelling of Chemicals (GHS). In either case, this would require the relabeling of a considerable number of imported products. The Authority considers that given the delayed and varied implementation of the GHS by New Zealand's major trading partners and the state of change within the GHS itself, the amendment is more efficient than allowing the provision's expiry, as this avoids companies having to re-label their products before importation into New Zealand. The relabeling would need to occur at the end of 2010 and again at a later date when GHS implementation is complete in those countries and also when planned updates to the New Zealand legislation take effect.

ERMA New Zealand and the Ministry for the Environment are currently consulting on proposals to amend the HSNO hazardous substances classification framework to bring it up to date with the 2009 version of the GHS. This will be undertaken in a manner that is consistent with the way that overseas jurisdictions have, or are intending to, adopt the GHS. Any changes to the HSNO classification framework will lead on to changes in labelling requirements for classified products. It is hoped that revised classification regulations will be in place by the end of 2010 and that these will provide a transitional period, which could extend for up to 5 years, for revised classifications and consequential label changes to be applied to products.

The current expiry date of 31 December 2010, as provided for in the group standards, was selected based on the Authority's understanding at the time of when overseas jurisdictions were likely to have adopted the GHS. This has since proven to have been optimistic. The reasons why the selected overseas labeling requirements were considered, at the time, to be an acceptable alternative means of addressing the risks of the substances remain valid now. It would therefore seem a less 'effective and efficient means of managing the risks' to change from the status quo (acceptance of overseas labels) solely because the initial date has proven to be ill-founded.

### *TTRMA*

The Trans Tasman Mutual Recognition Arrangement (TTRMA) was established between Australia and New Zealand in order to remove regulatory barriers to trade. Chemicals are currently subject to a special exemption to the overarching provisions of the TTRMA and there are moves to convert this to a permanent exemption in terms of the TTRMA legislation. However, this is not intended to apply permanently to all areas of regulation of chemicals, rather it is being done primarily to avoid the onerous regulatory mechanisms that are required to rollover the special exemption on an annual basis.

While there might be difficulty in achieving mutual recognition of approvals of hazardous substances in the near future, due to legislative impediments in the respective Australian and New Zealand legislation, progress towards harmonisation of regulated standards in areas such as labelling is still expected to be made.

A key aspect of progressing the TTRMA for chemicals is the consistent implementation, in both countries, of the GHS, and this is linked to obtaining consistency in global implementation. Acceptance of each other countries standards is the aim of the TTRMA. Exceptions to this can usually only be accepted if a jurisdiction considers that the standards or regulatory requirements applying to a product are such that the sale of the product could give rise to a threat to public health, safety or the environment (if there was harmonisation). Given that this is not considered to be the case with products approved under group standards, harmonisation of labelling, for the progressive implementation of TTRMA should be sought. Harmonisation implicitly introduces efficiency.

### *Conclusion*

The Authority considers that amending the expiry date of the provision is more efficient than maintaining the current expiry date.

### **Effectiveness**

The Authority considers that the relevant current labelling requirements of Australia, USA, Canada and the European Union are generally as protective of human health and the environment as that required by the HSNO Regulations or the GHS and therefore the amendment is as effective in managing the risks of hazardous substance in group standards as allowing the provision to expire.

The Authority notes that some New Zealand based manufacturers believed that they were unable to use the alternative labelling provision relating to the use of labels that comply with the requirements of Australia, USA, Canada and the European Union. This was reflected in some of the submissions received on the application. This created the impression that local manufacturers

were being treated differently from overseas manufacturers (importers) The New Zealand manufacturers provided evidence that this put them at a commercial disadvantage when their products were compared with similar products that were imported.

As any manufacturer or importer, regardless of the country of origin, may use the alternative labelling provision, the Authority considers that an enhanced communication strategy will help to address any future misconceptions. Manufacturers and importers are also able to use the other alternative compliance provisions which allow for the use of the HSNO regulations.

### *Costs*

Labelling can be a significant cost to the manufacture, sale and supply of a product. Actions that reduce or avoid the need to re-label would avoid the costs to the manufacturer associated with the re-labelling process. They also avoid those costs being passed on to the consumer, which if happened would also have consequential impacts on the economy more generally.

Although ERMA New Zealand does not have trade figures for New Zealand to hand, to provide an estimate of costs some comparisons and analogies can be drawn from Australian trade data.

For Australia, imports come from the EU 27.8%, USA 23.4%, New Zealand 2.4% and Canada 1.3%.

If Australia had an equivalent regulatory provision to the one in the group standards (with New Zealand replacing Australia) it would therefore affect 55% of imports. This equates to approximately AUS\$5.7 billion of imports per annum.

It is a reasonable assumption that the relative volume of imports into New Zealand over locally manufactured products is at least as high as in Australia. Clearly, the % of imports from Australia would be greater than the 2.4% of Australian imports from New Zealand, however, it would be reasonable to assume that this would be substantially offset by decreases in the EU and USA percentages.

Taking the New Zealand economy to be around one fifth the size of the Australian economy it is we can estimate the equivalent value of New Zealand imports that would be affected as being of the order of NZ\$1.8 billion per annum.

Advice from the applicant was that imports would be affected in two ways if the overseas provision lapsed:

- Withdrawal of products from the market
- Increases in prices to the consumer of products that were retained on the market.

Australian data on imports as a percentage of domestic sales, in the sectors largely covered by ACCORD's membership, is as follows (2005-06 data):

Paint	21%
Pesticides	32%
Soap and other detergents	17%
Cosmetics and toiletry preparations, etc	69%

(Other) Chemical product manufacturing 38%

Comparable data for New Zealand is not currently held by ERMA New Zealand. Given the much lower manufacturing base in New Zealand, however, it would not be unreasonable to assume that the New Zealand proportions of imports would be substantially higher.

It is significant that whilst these estimates are based on trade information for Australia, and putting aside that the application to amend the group standards was made by an Australian industry association, the lapsing of the 'overseas provision' would affect not only those products from Australia, but also imports from the USA, EU, and Canada.

#### Costs of relabeling a product

It is difficult to get an accurate estimate of this. The fixed costs of printing labels can be considered to be essentially zero for labels printed in-house but there is a printing plate cost of \$200 to \$300 per label for external printing.

The above figures relate to the one-off costs, in Australia of label changes. Additional costs would be incurred if a company had to maintain two sets of labels, for the Australian market and the New Zealand market.

Information provided by one of the submitters at the hearing indicated that for their company the need to re-label would have a one-off cost of \$1+ million and an ongoing annual cost of \$2+ million for their product range. The submitter also suggested that this cost would result in the removal a number of low-return products from the New Zealand marketplace.

The Authority considers that the costs of relabeling are substantial, may be passed onto the New Zealand consumer and may result in the removal of imported products from the New Zealand marketplace, thereby reducing consumer choice. Therefore, amending the expiry date is more cost effective than allowing the provision to expire.

#### *Conclusion*

The Authority considers that amending the expiry date of the provision is no less effective than maintaining the current expiry date. More significantly amending the expiry date is more cost effective.

#### **Manufactured Articles, Waste Products and Manufacturing By-Products**

Before amending the group standard, section 96C(1)(d) of the HSNO Act requires the Authority to, in the case of any product to which section 96B(2)(d) applies, be satisfied that—

- (i) *The benefits associated with a reduction of environmental and health risks outweigh the economic costs associated with complying with the group standard; and*
- (ii) *The amending of the group standards is the most efficient and effective way of managing the risks of all the products in the identified group, having considered matters including alternative methods of managing those risks; and*
- (iii) *The group standard is only applied to the extent that is reasonable necessary to manage the risks of the products.*

Section 96B(2)(d) applies to a product (including, but not limited to, a manufactured article, a waste product, or a manufacturing by-product) that is, contains, incorporates or includes a hazardous substance. The group standards referred to in the application (Appendix A) do not provide an approval for manufactured articles, waste products or manufacturing by-products. Therefore, the Authority concludes that these matters do not apply to this application.

### **One Set of Conditions for Similar Nature, Type, or Circumstance of Use**

Before amending a group standard, section 96C(1)(e) requires that the Authority be satisfied that if the group standard applies to more than 1 hazardous substance or product, all the hazardous substances or products have a similar nature, or are of a similar type, or have similar circumstances of use, such that the risks of the group of hazardous substances or products can be effectively managed by 1 set of conditions.

The Authority considers that the proposed amendment would have no effect on the similar nature characteristic of substances that are currently covered by these group standards.

### **Amendment Options Considered by the Authority**

As previously noted, the Authority has identified a number of options regarding the proposed amendment. These are:

1. No amendment, the expiry date remains at 31 December 2010.
2. Amending the expiry date, for which a variety of options were identified:
  - a. Extending the expiry date to 31 December 2020, as proposed by the applicant.
  - b. Extending the expiry date to 1 June 2015, the EU transitional period expiry date.
  - c. Extending the expiry date to 31 December 2016, the Australian workplace chemicals transitional period expiry date.
  - d. The removal of an expiry date. The provision would be retained, but have no expiry date.

The above discussion on efficiency and effectiveness relates to a comparison of options 1 and 2 (i.e. whether to retain the expiry date of 31 December 2010 or to extend the expiry date), but does not discuss in detail the various options for amending the expiry date. The relative merits of the various options for extending the expiry date (including removing the expiry date) are discussed below:

Option a. is an arbitrarily selected date proposed by the applicant. To the Authority's knowledge it does not relate to any known or projected implementation timetable of an overseas jurisdiction.

Of options b. and c., the Authority considers option c to have greater merit because:

- Amendments to the HSNO classification regulations to update the GHS criteria are expected to be promulgated at the end of 2010, with a possible 5 year implementation period which would run through until the end of 2015.
- Australia is a closer economic partner than the EU and there are TTMRA considerations to be taken into account.

Whilst options a, b and c have merit, option d was considered by the Authority to offer the greatest flexibility and was therefore considered to be its most preferred option. The Authority noted that:

- If the provision was left in the group standards with no specified expiry date, it would either simply become redundant with time as those specified countries adopted the GHS or it would continue to provide an alternative for as long as the Authority was satisfied that the labelling requirements of those countries provided an equivalent level of safety to the HSNO/GHS requirements.
- The removal of a date would remove the requirement for another application for amendment should the implementation of GHS by New Zealand's major trading partners not occur before any expiry date that would otherwise be established.

### **Overall Conclusion**

The Authority considers that an amendment to the expiry date is both efficient and effective (including being cost effective). Such an amendment would have no effect on the similar nature characteristic of substances that are currently covered by these group standards.

# The Next Steps

## Following Consultation

Following consultation on the Authority's assessment of the matters to be considered before amending the group standards:

1. Each written submission will be reviewed (please note that previous submissions received relating to this application will be considered and new submissions should include information not previously provided);
2. A summary of submissions will be prepared and sent to all submitters, and placed on the ERMA New Zealand web site;
3. If required, a hearing will be held (a hearing will only be held if one is requested by a submitter and that submitter wishes to present information that was not previously heard at the hearing on 12 November 2009);
4. If approved by the Authority, notice of the amendment to the group standard will be published in the *New Zealand Gazette*.

# How To Have Your Say

Your feedback on the Authority's assessment of the matters to be considered before amending the group standards is important in ensuring that the risks involved are adequately managed under the Hazardous Substances and New Organisms (HSNO) Act 1996.

Please take this opportunity to have your say on this assessment.

You can provide comment by making a submission on your own behalf or as a member of an organisation.

The submissions received will be summarised and presented to the Authority in a Summary of Submissions document, together with the proposal to amend this Group Standard. If approved by the Authority, the amendment to the Group Standard will be published in the *New Zealand Gazette*.

You can make a submission by writing your comments on the submission form entitled 'Making a Submission' on the following page of this document. Submissions can be made by mail, fax or email and should be addressed to:

ERMA New Zealand  
PO Box 131  
Wellington  
Fax: 04 9140433  
Email: haydn.murdoch@ermanız.govt.nz  
Please mark all submissions to the attention of Haydn Murdoch

**All submissions must be received by 5 pm, Friday 12 February 2010.**

For any queries on the Authority's assessment contact;

Haydn Murdoch  
Advisor  
Hazardous Substances  
Phone: +64 4 918 4881  
Email: haydn.murdoch@ermanız.govt.nz

# Making a Submission

Name of person or organisation  
making submission (required):

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Postal address (required):

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Town (required):

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Country (required):

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Phone:

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Fax:

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Contact E-mail:

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Are you submitting this as (tick one box only in this section):

An individual (not on behalf of an organisation)

On behalf of a group or organisation

Other (please specify)

---

Please return your submission no later than **Friday 12 February 2010** by post to:

ERMA New Zealand  
PO Box 131  
Wellington  
New Zealand

Name of Consultation:

**Amendment to Group Standards – Extension to Alternative Labelling Provisions – Authority’s Assessment**

Reason for submission (required):

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What decision do you seek?

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Do you wish to speak in support of your submission at a public hearing? (required – choose only one):

Yes

No

All submissions will be acknowledged by ERMA New Zealand and a summary of submissions will be sent to all those who request a copy. The summary will include the names of all those who made a submission. In the case of those who withhold permission to release personal details, the name of the organisation will be given if supplied.

**Do you wish to receive a copy of the summary of submissions?**

Yes  No

Your submission may be requested under the Official Information Act 1982. If this happens, ERMA New Zealand may be required to release your submission to the person who requested it. If you are an individual, and we are required to release your submission, we will remove your personal details from the submission if you check the following box.

I **do not** give permission for my personal details to be released to  persons under the Official Information Act 1982.

**Note:**

In the case that a submitter **does not** tick the box, this does not mean that their personal information will necessarily be released in response to a request for information. Rather, objective consideration of all the facts and circumstances of that particular case will have to be undertaken (including Official Information Act and Privacy Act requirements) to determine whether a submission is to be released with their personal details included.

# Submission on Amendment to Group Standards – Extension of Alternative Labelling Provisions – Authority’s Assessment

Use additional paper if required.

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## **Appendix A – List of group standards affected by the amendment**

*Additives, Process Chemicals and Raw Materials (Combustible) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Corrosive) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Corrosive, Combustible) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Corrosive, Toxic [6.7]) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Corrosive, Toxic [6.7], Combustible) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Flammable) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Flammable, Corrosive ) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Flammable, Corrosive, Toxic [6.7]) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Flammable, Toxic [6.1 + 6.7]) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Flammable, Toxic [6.1 + 6.7], Corrosive) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Flammable, Toxic [6.1]) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Flammable, Toxic [6.1], Corrosive ) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Flammable, Toxic [6.7]) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Subsidiary Hazard) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Toxic [6.1 + 6.7]) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Toxic [6.1 + 6.7], Combustible) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Toxic [6.1 + 6.7], Corrosive) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Toxic [6.1 + 6.7], Corrosive, Combustible) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Toxic [6.1]) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Toxic [6.1], Combustible) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Toxic [6.1], Corrosive) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Toxic [6.1], Corrosive, Combustible) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Toxic [6.7]) Group Standard 2006*  
*Additives, Process Chemicals and Raw Materials (Toxic [6.7], Combustible) Group Standard 2006*  
*Aerosols (Corrosive) Group Standard 2006*  
*Aerosols (Flammable) Group Standard 2006*  
*Aerosols (Flammable, Corrosive) Group Standard 2006*  
*Aerosols (Flammable, Toxic [6.7]) Group Standard 2006*  
*Aerosols (Non-hazardous) Group Standard 2006*  
*Aerosols (Subsidiary Hazard) Group Standard 2006*  
*Aerosols (Toxic [6.7]) Group Standard 2006*  
*Animal Nutritional and Animal Care Products Group Standard 2006*  
*Class 4 Substances Group Standard 2006*  
*Class 4, Toxic [6.1] Substances Group Standard 2006*  
*Class 4, Toxic [6.7] Substances Group Standard 2006*  
*Organic Peroxides Group Standard 2006*  
*Organic Peroxides, Corrosive Group Standard 2006*  
*Organic Peroxides, Toxic [6.1], Corrosive Group Standard 2009*  
*Oxidising [5.1.1] Substances Group Standard 2006*  
*Oxidising [5.1.1], Corrosive Substances Group Standard 2006*  
*Oxidising [5.1.1], Toxic [6.1 + 6.7], Corrosive Substances Group Standard 2006*  
*Oxidising [5.1.1], Toxic [6.1] Substances Group Standard 2006*  
*Cleaning Products (Combustible) Group Standard 2006*  
*Cleaning Products (Corrosive) Group Standard 2006*  
*Cleaning Products (Corrosive, Combustible) Group Standard 2006*  
*Cleaning Products (Flammable) Group Standard 2006*  
*Cleaning Products (Flammable, Corrosive) Group Standard 2006*  
*Cleaning Products (Oxidising [5.1.1]) Group Standard 2006*  
*Cleaning Products (Oxidising [5.1.1], Corrosive) Group Standard 2006*  
*Cleaning Products (Subsidiary Hazard) Group Standard 2006*

*Cleaning Products (Toxic [6.7]) Group Standard 2006*  
*Industrial and Institutional Cleaning Products (Corrosive, Toxic [6.7]) Group Standard 2006*  
*Industrial and Institutional Cleaning Products (Flammable, Toxic [6.7]) Group Standard 2006*  
*Industrial and Institutional Cleaning Products (Toxic [6.1 + 6.7]) Group Standard 2006*  
*Industrial and Institutional Cleaning Products (Toxic [6.1]) Group Standard 2006*  
*Industrial and Institutional Cleaning Products (Toxic [6.1], Combustible) Group Standard 2006*  
*Industrial and Institutional Cleaning Products (Toxic [6.1], Corrosive) Group Standard 2006*  
*Industrial and Institutional Cleaning Products (Toxic [6.7], Combustible) Group Standard 2006*  
*Compressed Gas Mixtures (Flammable) Group Standard 2006*  
*Compressed Gas Mixtures (Non-hazardous) Group Standard 2006*  
*Compressed Gas Mixtures (Oxidising [5.1.2]) Group Standard 2006*  
*Compressed Gas Mixtures (Subsidiary Hazard) Group Standard 2006*  
*Compressed Gas Mixtures (Toxic [6.1]) Group Standard 2006*  
*Compressed Gas Mixtures (Toxic [6.1], Corrosive) Group Standard 2006*  
*Compressed Gas Mixtures (Toxic [6.1], Flammable) Group Standard 2006*  
*Compressed Gas Mixtures (Toxic [6.1], Flammable, Corrosive) Group Standard 2006*  
*Compressed Gas Mixtures (Toxic [6.1], Oxidising [5.1.2]) Group Standard 2006*  
*Compressed Gas Mixtures (Toxic [6.1], Oxidising [5.1.2], Corrosive) Group Standard 2006*  
*Construction Products (Corrosive [8.2C]) Group Standard 2006*  
*Construction Products (Corrosive [8.2C], Toxic [6.7A]) Group Standard 2006*  
*Construction Products (Subsidiary Hazard) Group Standard 2006*  
*Construction Products (Toxic [6.7A]) Group Standard 2006*  
*Corrosion Inhibitors (Combustible) Group Standard 2006*  
*Corrosion Inhibitors (Corrosive) Group Standard 2006*  
*Corrosion Inhibitors (Flammable) Group Standard 2006*  
*Corrosion Inhibitors (Subsidiary Hazard) Group Standard 2006*  
*Corrosion Inhibitors (Toxic [6.1]) Group Standard 2006*  
*Corrosion Inhibitors (Toxic [6.7]) Group Standard 2006*  
*Dental Products (Combustible) Group Standard 2006*  
*Dental Products (Corrosive) Group Standard 2006*  
*Dental Products (Flammable) Group Standard 2006*  
*Dental Products (Oxidising [5.1.1]) Group Standard 2006*  
*Dental Products (Subsidiary Hazard) Group Standard 2006*  
*Dental Products (Toxic [6.1], Corrosive) Group Standard 2006*  
*Dental Products (Toxic [6.7]) Group Standard 2006*  
*Embalming Products (Combustible) Group Standard 2006*  
*Embalming Products (Corrosive [8.2C]) Group Standard 2006*  
*Embalming Products (Flammable) Group Standard 2006*  
*Embalming Products (Flammable, Toxic [6.1], Corrosive) Group Standard 2006*  
*Embalming Products (Subsidiary Hazard) Group Standard 2006*  
*Embalming Products (Toxic [6.1], Corrosive) Group Standard 2006*  
*Embalming Products (Toxic [6.1], Corrosive, Combustible) Group Standard 2006*  
*Embalming Products (Toxic [6.7]) Group Standard 2006*  
*Fertilisers (Corrosive) Group Standard 2006*  
*Fertilisers (Oxidising [5.1.1]) Group Standard 2006*  
*Fertilisers (Subsidiary Hazard) Group Standard 2006*  
*Fertilisers (Toxic [6.1C]) Group Standard 2006*  
*Fire Fighting Chemicals Group Standard 2006*  
*Food Additives and Fragrance Materials (Combustible) Group Standard 2006*  
*Food Additives and Fragrance Materials (Corrosive) Group Standard 2006*  
*Food Additives and Fragrance Materials (Flammable) Group Standard 2006*  
*Food Additives and Fragrance Materials (Flammable, Toxic [6.1]) Group Standard 2006*

*Food Additives and Fragrance Materials (Subsidiary Hazard) Group Standard 2006*  
*Food Additives and Fragrance Materials (Toxic [6.1]) Group Standard 2006*  
*Food Additives and Fragrance Materials (Toxic [6.1], Combustible) Group Standard 2006*  
*Fuel Additives (Combustible) Group Standard 2006*  
*Fuel Additives (Corrosive) Group Standard 2006*  
*Fuel Additives (Flammable) Group Standard 2006*  
*Fuel Additives (Flammable, Toxic [6.7]) Group Standard 2006*  
*Fuel Additives (Subsidiary Hazard) Group Standard 2006*  
*Fuel Additives (Toxic [6.7]) Group Standard 2006*  
*Fuel Additives (Toxic [6.7], Combustible) Group Standard 2006*  
*Laboratory Chemicals and Reagent Kits (Class 4) Group Standard 2006*  
*Laboratory Chemicals and Reagent Kits (Oxidising [5.1.1]) Group Standard 2006*  
*Laboratory Chemicals and Reagent Kits Group Standard 2006*  
*Reagent Kits Group Standard 2006*  
*Leather and Textile Products (Combustible) Group Standard 2006*  
*Leather and Textile Products (Corrosive) Group Standard 2006*  
*Leather and Textile Products (Flammable) Group Standard 2006*  
*Leather and Textile Products (Subsidiary Hazard) Group Standard 2006*  
*Leather and Textile Products (Toxic [6.7]) Group Standard 2006*  
*Lubricants (Combustible) Group Standard 2006*  
*Lubricants (Flammable) Group Standard 2006*  
*Lubricants (Flammable, Toxic [6.7]) Group Standard 2006*  
*Lubricants (Low Hazard) Group Standard 2006*  
*Lubricants (Subsidiary Hazard) Group Standard 2006*  
*Lubricants (Toxic [6.7]) Group Standard 2006*  
*Lubricants (Toxic [6.7], Combustible) Group Standard 2006*  
*Metal Industry Products (Corrosive) Group Standard 2006*  
*Metal Industry Products (Corrosive, Toxic [6.7]) Group Standard 2006*  
*Metal Industry Products (Flammable) Group Standard 2006*  
*Metal Industry Products (Subsidiary Hazard) Group Standard 2006*  
*Metal Industry Products (Toxic [6.1 + 6.7]) Group Standard 2006*  
*Metal Industry Products (Toxic [6.1]) Group Standard 2006*  
*Metal Industry Products (Toxic [6.1], Corrosive) Group Standard 2006*  
*Metal Industry Products (Toxic [6.7]) Group Standard 2006*  
*N.O.S. (Combustible) Group Standard 2006*  
*N.O.S. (Corrosive) Group Standard 2006*  
*N.O.S. (Corrosive, Combustible) Group Standard 2006*  
*N.O.S. (Flammable) Group Standard 2006*  
*N.O.S. (Flammable, Corrosive) Group Standard 2006*  
*N.O.S. (Flammable, Toxic [6.1, 6.7]) Group Standard 2006*  
*N.O.S. (Flammable, Toxic [6.1, 6.7], Corrosive) Group Standard 2006*  
*N.O.S. (Subsidiary Hazard) Group Standard 2006*  
*N.O.S. (Toxic [6.1, 6.7]) Group Standard 2006*  
*N.O.S. (Toxic [6.1, 6.7], Combustible) Group Standard 2006*  
*N.O.S. (Toxic [6.1, 6.7], Corrosive) Group Standard 2006*  
*N.O.S. (Toxic [6.1, 6.7], Corrosive, Combustible) Group Standard 2006*  
*Photographic Chemicals (Combustible) Group Standard 2006*  
*Photographic Chemicals (Corrosive) Group Standard 2006*  
*Photographic Chemicals (Flammable) Group Standard 2006*  
*Photographic Chemicals (Subsidiary Hazard) Group Standard 2006*  
*Photographic Chemicals (Toxic [6.7]) Group Standard 2006*  
*Polymers (Combustible) Group Standard 2006*

*Polymers (Flammable) Group Standard 2006*  
*Polymers (Flammable, Corrosive) Group Standard 2006*  
*Polymers (Flammable, Toxic [6.7]) Group Standard 2006*  
*Polymers (Subsidiary Hazard) Group Standard 2006*  
*Polymers (Toxic [6.1]) Group Standard 2006*  
*Polymers (Toxic [6.7]) Group Standard 2006*  
*Refining Catalysts Group Standard 2006*  
*Solvents (Combustible) Group Standard 2006*  
*Solvents (Flammable) Group Standard 2006*  
*Solvents (Flammable, Toxic [6.7]) Group Standard 2006*  
*Solvents (Subsidiary Hazard) Group Standard 2006*  
*Solvents (Toxic [6.1]) Group Standard 2006*  
*Solvents (Toxic [6.7]) Group Standard 2006*  
*Solvents (Toxic [6.7], Combustible) Group Standard 2006*  
*Surface Coatings and Colourants (Combustible) Group Standard 2006*  
*Surface Coatings and Colourants (Corrosive) Group Standard 2006*  
*Surface Coatings and Colourants (Corrosive, Combustible) Group Standard 2006*  
*Surface Coatings and Colourants (Corrosive, Toxic [6.7]) Group Standard 2006*  
*Surface Coatings and Colourants (Corrosive, Toxic [6.7], Combustible) Group Standard 2006*  
*Surface Coatings and Colourants (Flammable) Group Standard 2006*  
*Surface Coatings and Colourants (Flammable, Corrosive) Group Standard 2006*  
*Surface Coatings and Colourants (Flammable, Corrosive, Toxic [6.7]) Group Standard 2006*  
*Surface Coatings and Colourants (Flammable, Toxic [6.1 + 6.7]) Group Standard 2006*  
*Surface Coatings and Colourants (Flammable, Toxic [6.1 + 6.7], Corrosive) Group Standard 2006*  
*Surface Coatings and Colourants (Flammable, Toxic [6.1]) Group Standard 2006*  
*Surface Coatings and Colourants (Flammable, Toxic [6.1], Corrosive) Group Standard 2006*  
*Surface Coatings and Colourants (Flammable, Toxic [6.7]) Group Standard 2006*  
*Surface Coatings and Colourants (Subsidiary Hazard) Group Standard 2006*  
*Surface Coatings and Colourants (Toxic [6.1 + 6.7]) Group Standard 2006*  
*Surface Coatings and Colourants (Toxic [6.1 + 6.7], Combustible) Group Standard 2006*  
*Surface Coatings and Colourants (Toxic [6.1 + 6.7], Corrosive) Group Standard 2006*  
*Surface Coatings and Colourants (Toxic [6.1 + 6.7], Corrosive, Combustible) Group Standard 2006*  
*Surface Coatings and Colourants (Toxic [6.1]) Group Standard 2006*  
*Surface Coatings and Colourants (Toxic [6.1], Combustible) Group Standard 2006*  
*Surface Coatings and Colourants (Toxic [6.1], Corrosive) Group Standard 2006*  
*Surface Coatings and Colourants (Toxic [6.1], Corrosive, Combustible) Group Standard 2006*  
*Surface Coatings and Colourants (Toxic [6.7]) Group Standard 2006*  
*Surface Coatings and Colourants (Toxic [6.7], Combustible) Group Standard 2006*  
*Water Treatment Chemicals (Corrosive) Group Standard 2006*  
*Water Treatment Chemicals (Flammable [3.1C]) Group Standard 2006*  
*Water Treatment Chemicals (Oxidising [5.1.1]) Group Standard 2006*  
*Water Treatment Chemicals (Subsidiary Hazard) Group Standard 2006*  
*Water Treatment Chemicals (Toxic [6.1]) Group Standard 2006*  
*Water Treatment Chemicals (Toxic [6.1], Corrosive) Group Standard 2006*  
*Water Treatment Chemicals (Toxic [6.7]) Group Standard 2006*

For the avoidance of doubt, the amendment does not apply to the following Group Standards as they do not include the labelling exemption:

*Cosmetic Products Group Standard 2006*  
*Denatured Ethanol Group Standard 2006*  
*Graphic Materials Group Standard 2009*