

ENVIRONMENTAL RISK MANAGEMENT AUTHORITY DECISION

20 April 2010

Purpose of the Application	To amend the expiry date of the alternative compliance provisions for labelling contained within group standards
Applicant	ACCORD Australasia Ltd
Date Application Notified	16 April 2009
Initial Consideration Date	8 December 2009
Final Consideration Date	12 April 2010
Considered by	A Committee of the Authority

1 Summary of decision

- 1.1 This decision relates to the group standards listed in **Appendix A**.
- 1.2 An amendment to the group standards is **approved** in accordance with the relevant provisions of the Hazardous Substances and New Organisms Act 1996 (the HSNO Act), the relevant HSNO Regulations and the HSNO (Methodology) Order 1998 (the Methodology).
- 1.3 The alternative provisions for labelling of substances covered by group standard approvals will remain, but the expiry date currently attached to these provisions will be removed. There will be no end date for this alternative labelling provision.

2 Legislative criteria for the application

- 2.1 This decision to amend the group standards was determined in accordance with section 96C, taking into account matters relevant to the purpose of the Act specified under Part 2 of the HSNO Act. Unless otherwise stated, references to section numbers in this decision refer to sections of the Act.
- 2.2 Consideration of the application followed the relevant provisions of the Methodology. Unless otherwise stated, references to clauses in this decision refer to clauses of the Methodology.

3 Application process

- 3.1 The application by ACCORD Australasia Ltd to amend the group standards listed in Appendix A was formally received on 20 January 2009.
- 3.2 In accordance with sections 53 and 96C(1)(h)(i), 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.
- 3.3 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 (sections 53(4) and 58(1)(c), and clauses 2(2)(e) and 5) and provided with an opportunity to comment or make a public submission on the application.
- 3.4 Submissions closed on 5 June 2009.
- 3.5 Twenty-four submissions were received. Six parties initially requested to be heard.
- 3.6 A Committee of the Authority was established to hear and consider the application. The Committee comprised of the following members of the Authority: Ms Helen Atkins (Chair), Dr Max Sucking and Dr Deborah Read.
- 3.7 The Agency prepared a consideration paper¹ to aid the Committee in its decision making process. The consideration paper was provided to all submitters and other parties who requested a copy on 21 October 2009. It was also available on the ERMA web site from this date.
- 3.8 A hearing was held on 12 November 2009. Four parties and the applicant presented oral submissions to the Committee. Two parties who had initially requested to be heard withdrew their requests prior to the hearing. The Agency presented its consideration paper.
- 3.9 An initial consideration was held on 8 December 2009.
- 3.10 The information available to the Committee comprised:
 - the consideration paper;
 - an audio recording and the electronic presentations from the hearing; and
 - an issues paper identifying some of the key issues raised at the hearing.
- 3.11 As part of the consideration, the Committee undertook, on behalf of the Authority, an assessment of the efficiency and effectiveness of the proposed amendment and determined whether the amendment would impact on the ability of the group standards to be managed by one set of conditions (section 96C(1)(a), (b), (c), (d) and (e)).

¹ ERMA New Zealand Consideration Paper – HGA09001 Application to Amend Group Standards – Extension of Alternative Labelling Provisions dated October 2009

- 3.12 The Agency prepared a consultation paper² based on this assessment.
- 3.13 The Authority's assessment was publically notified, in accordance with sections 53 and 96C(1)(h)(ii), on ERMA New Zealand's website on 18 January 2010 and in the four main metropolitan newspapers on 23 January 2010.
- 3.14 Various government departments, Crown entities and interested parties, which in the opinion of the Authority would be likely to have an interest in the Authority's assessment, were notified of the release of the assessment and provided with an opportunity to comment or make a public submission on the assessment.
- 3.15 Submissions closed on 12 February 2010.
- 3.16 Thirty submissions were received. Eleven parties requested to be heard, but only if a hearing was deemed necessary. The Committee determined, since all the submissions supported the Authority's assessment, that no hearing was necessary.
- 3.17 A final consideration was held on 12 April 2010.
- 3.18 The information available to the Committee at the final consideration comprised:
- the information provided at the initial consideration;
 - the consultation document on the Authority's assessment; and
 - a summary of submissions received relating to the Authority's assessment.

4 Consideration

Purpose of the application

- 4.1 The purpose of the application is to amend the expiry date of the alternative compliance provisions for labelling contained within group standards.

The considerations

- 4.2 At the consideration meetings of 9 December 2009 and 12 April 2010, the Committee, in accordance with clause 24:
- identified the amendments to the group standards to be considered by the Authority;
 - considered the matters that the Authority needs to be satisfied with under Part 6A of the Act to amend these group standards;
 - confirmed that the Authority's internal quality assurance process has been undertaken; and
 - reached a decision on the proposed amendments to the group standards.

Proposed amendment

- 4.3 One of the alternative compliance provisions for labelling in group standards allows exemption from the HSNO labelling requirements of the group standard if a substance complies with:

² Consultation Paper – Amendment to Group Standards: Extension of Alternative Labelling Provisions – Environmental Risk Management Authority – Assessment of Matters to be Considered dated January 2010.

- (a) 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
- (b) the group standard requirement to provide the product name, 24 hour emergency number, information on New Zealand importer, supplier or manufacturer and directions for use.

4.4 This alternative compliance provision expires on 31 December 2010.

4.5 The amendment, as proposed by the applicant, was to substitute the current expiry date with 31 December 2020.

4.6 As a result of its review of the application and the information that was received via submissions on the application (submission period 16 April 2009 to 5 June 2009) and the hearing into the application (12 November 2009), the Committee identified a number of options regarding the proposed amendment. These were:

- 1) No amendment, the expiry date remains at 31 December 2010. In essence the application would be declined.
- 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, which is a key GHS implementation date for the EU.
 - c. Extending the expiry date to 31 December 2016, the proposed Australian workplace chemicals transitional period expiry date.
 - d. The removal of an expiry date. The alternative labelling provision would be retained, but it would have no expiry date.

Requirements of Part 6A of the Act

Public notification

4.7 Before amending a group standard, section 96C(1)(h) requires the Authority to publicly notify–

- (i) the proposal to amend the group standard; and
- (ii) its assessment of the matters required under subsections (1)(a), (b), (c), (d) and (e) in relation to the group standard as proposed to be amended³.

4.8 In accordance with sections 53 and 96C(1)(h)(i) a public notice was placed in the main metropolitan newspapers on 22 April 2009, indicating the release for consultation of a proposal to amend the group standards.

³ These are the matters that relate to efficiency and effectiveness of the proposed amendment.

- 4.9 Release of this proposal was also notified on the ERMA New Zealand website on 16 April 2009. The consultation document was available from the consultation page of the website from that date.
- 4.10 Thirty working days were allowed for the receipt of submissions. The submission period ran from 16 April 2009 to 5 June 2009.
- 4.11 The consultation document included a submission form and explained the process for making a submission.
- 4.12 In accordance with section 96C(1)(h)(ii), a public notice was placed in the main metropolitan newspapers (New Zealand Herald, Dominion Post, Christchurch Press and the Otago Daily Times) on 23 January 2010 indicating the release for consultation of the Authority's assessment of matters relating to the proposed amendment to the group standards.
- 4.13 Release of this proposal was also notified on the ERMA New Zealand website on 18 January 2010. The consultation document was available from the consultation page of the website from that date.
- 4.14 Twenty working days were allowed for the receipt of submissions. The submission period ran from 18 January 2010 to 12 February 2010.
- 4.15 The consultation document included a submission form and explained the process for making a submission.

More efficient and effective

- 4.16 Before amending a group standard, sections 96C(1)(a), (b) and (c) 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

- 4.17 The Committee considers that amending the group standards 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.
- 4.18 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 Committee 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. Relabeling would need to occur at the end of 2010 (when the provision expires) and potentially 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.

- 4.19 The current expiry date of 31 December 2010, as provided for in the group standards, was set based on the Authority's understanding at the time of when overseas jurisdictions were likely to have adopted the GHS. The timing for this has since proven to have been optimistic. Nonetheless, the reasons why the selected overseas labelling requirements were considered in 2006 to be an acceptable alternative means of addressing the risks of the substances, remain equally valid now.
- 4.20 The Committee notes that 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 TTMRA. Although this is currently being converted to a Permanent Exemption, it is not intended that this apply permanently to all areas of regulation of chemicals. A key aspect of progressing the TTMRA 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 TTMRA. Harmonisation of labelling, for the progressive implementation of TTRMA, therefore should be sought. Harmonisation implicitly introduces efficiency.

Conclusion

- 4.21 The Committee considers that amending the expiry date of the alternative labelling provision is more efficient than maintaining the current expiry date.

Effectiveness

- 4.22 The Committee 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 those required by the HSNO Regulations or the GHS and, therefore, the amendment is as effective in managing the risks of hazardous substances in group standards as maintaining the current expiry date.
- 4.23 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 or the removal of products from the market, which if it happened would also have consequential impacts on the economy more generally. The Committee considers, therefore, that amending the expiry date is more cost effective than maintaining the current expiry date.

Conclusion

- 4.24 The Committee considers that amending the expiry date of the alternative labelling provision is no less effective than maintaining the current expiry date. Further, the Committee considers that amending the expiry date is more cost effective.

One set of conditions for similar nature, type, or circumstance of use

- 4.25 Before amending a group standard, section 96C(1)(e) requires that the Authority be satisfied that if the group standard applies to more than one 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 one set of conditions.
- 4.26 The proposed amendment would have no effect on the similar nature characteristics of substances that are currently covered by the group standards listed in Appendix A.

International practices and standards

- 4.27 Before issuing or amending a group standard, section 96C(1)(f) requires that the Authority consider the best international practices and standards for the safe management of hazardous substances and products.
- 4.28 The Committee notes that the labelling requirements of Australia, USA, Canada and the European Union are designed in accordance with best international practice and standards. They are designed to be protective of human health and the environment.
- 4.29 Therefore, the Committee considers that the continued acceptance of labels which meet the relevant current labelling requirements of Australia, USA, Canada and the European Union is consistent with the best international practices and standards for the safe management of hazardous substances and products.

Controls under sections 77, 77A and 77B

- 4.30 Before issuing or amending a group standard, section 96C(1)(g) requires that the Authority consider the types of controls appropriate for the group in accordance with sections 77, 77A and 77B.
- 4.31 With the exception of the proposed change to the labelling controls, the proposed amendment will have no effect on the existing controls that apply to the group standards listed in Appendix A. The Committee, therefore, does not consider other variations of controls under sections 77, 77A and 77B are necessary.

Discussion of amendment options

- 4.32 Consideration of the above matters relate to a comparison of whether to retain the expiry date of 31 December 2010 or to amend the expiry date. It does not discuss in detail the various options identified by the Committee for amending the expiry date (see paragraph 4.6). Based on the above, the Committee considers there is a case for amending the expiry date. The relative merits of the various options for an amended expiry date (including removing the expiry date) are considered in the following paragraphs.

- 4.33 Option a. (extension to 2020). 2020 is a somewhat arbitrary date proposed by the applicant. To the Committee's knowledge it does not relate to any known or projected timetable of an overseas jurisdiction for implementation of GHS. Alignment with an overseas implementation date would remove any need to relabel and is therefore a more favoured approach.
- 4.34 Of options b. (extension to 1 June 2015) and option c. (extension to 31 December 2016), the Committee considers option c to have greater merit because:
- Amendments to the HSNO classification regulations to update them to the current 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.
 - However, there is some uncertainty around the effect of the Australia date, as it is only proposed at present to apply to workplace hazardous substances.
- 4.35 Option d (removal of the expiry date). The Committee notes 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 a future 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.
- 4.36 The Committee considers that whilst options a, b and c have merit, option d was considered by the Committee to offer the greatest flexibility and was, therefore, considered to be its most preferred option.

5 Recommendation

- 5.1 The Committee notes that the rationale used to support their decisions are based on two key elements:
- 5.1.1 Uncertainty and delays in the timing for the international adoption of GHS labelling, especially those of our major trading partners; and
- 5.1.2 Labels which meet the current labelling requirements of Australia, Canada, the US and the EU are considered as protective to human health and the environment as those required under the existing HSNO framework.

- 5.2 The Committee wishes to ensure that this rationale remains valid over the foreseeable future. Therefore, the Committee recommends the following:
- 5.2.1 That the Agency undertake a review of the international implementation of GHS labelling and a comparison between the labelling standards of Australia, Canada, the US and the EU, and those required by GHS, no later than 1 July 2016.
 - 5.2.2 The Agency is to report back to the Authority the findings of the review and the matters in regards of the rationale set out in paragraphs 5.1.1 and 5.1.2.

6 Decision

- 6.1 The Committee has considered the application to amend the group standards, identified in **Appendix A**, made under section 96B(4) of the Act.
- 6.2 The Committee is satisfied that requirements of Section 96C of the Act have been met.
- 6.3 The Committee approves the application to the extent that the alternative labelling provision is retained, but rather than accept the revised date proposed by the applicant, the Committee has decided to remove the expiry date altogether. The Committee approves the publication of this amendment in the New Zealand Gazette.

Ms Helen Atkins

Date: 20 April 2010

Chair

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