

18 November 2009

Kyla Scott  
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Dear Kyla Scott

### **Discussion Paper Updating HSNO Regulations to Current GHS Criteria**

ERMA New Zealand, in conjunction with the Ministry for the Environment, is calling for public submissions on proposals to amend the hazardous substances classification framework under the HSNO Act to reflect the current United Nations *Globally Harmonised System of Classification and Labelling of Chemicals (GHS)*.

The Hazardous Substances (Minimum Degrees of Hazard) Regulations 2001 and the Hazardous Substances (Classification) Regulations 2001 were developed from draft proposals for the GHS that were available in 2000. Since that time, the finalised GHS has been published by the United Nations and a 3<sup>rd</sup> revised edition was released in July 2009. Consequently, there are now several areas of difference between the classification framework of the HSNO regulations and that of the GHS.

The discussion paper identifies these differences and also compares the form of adoption of the GHS in New Zealand with that of overseas jurisdictions, particularly the European Union and Australia. Proposals and options are presented for updating the HSNO regulations and for enhancing alignment of these with the systems of some of New Zealand's major trading partners. Your feedback on these is important as it will enable ERMA New Zealand to report to the Minister for the Environment on the proposals to revise the regulations. Please take this opportunity to have your say.

Please note that this consultation relates only to the classification framework contained within the HSNO regulations and does not concern other parts of the regulatory framework, such as labeling requirements, or the application of that framework to classifications assigned to particular substances.

**The discussion paper is available for public comment from 18 November 2009 until 19 February 2010** and is on the ERMA New Zealand website: <http://www.ermanz.govt.nz/hs/abouts/ghscriteria.html>

Written feedback is preferred and we encourage you to make your submissions by writing your comments in the spaces provided in the document. This should then be forwarded by email to [samantha.smith@ermanz.govt.nz](mailto:samantha.smith@ermanz.govt.nz), or fax +64 4 9140433, or by mail to the address below, marking it for the attention of Samantha Smith.

For any queries on the content of this discussion document, please contact: Dr Peter Dawson, Principal Scientist, ERMA New Zealand, on +64 4 9162426 or email - [peter.dawson@ermanz.govt.nz](mailto:peter.dawson@ermanz.govt.nz).

Yours sincerely



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**Applications Administrator**