

MS comments Template

QF003	Document: DCRS 80: 202x - Terminology and Definitions for Hazardous Substances and Products Containing Hazardous Substances
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1	2	(3)	4	5	(6)		(7)
MB ¹	Clause No./ Subclause No./ Annex / Figure / Table	Line Number	Type of comment ²	Comment (justification for change) by the MB	Proposed change by the MB	Consultants' Comments (Te or Ge comment)	RTC observations on each comment submitted
TT			Te	The definition of "chemical" refers to a "substance" but lacks alignment with the broader GHS context, where "chemical" encompasses substances and mixtures	To ensure consistency, modify the definition for clarity and alignment with existing GHS terminology.	What is the proposed change to the definition? We could change to Substances and mixtures	Accepted. Include substance and mixture in the definition for chemical.
TT	Foreword	8	Ed	Insert 'the'	Basel Convention on [the] Control of Transboundary Movements of Hazardous Wastes and their Disposal		Accepted.
TT	Foreword	11	Ed	Insert the full name of the Rotterdam Convention	Rotterdam Convention [on the prior informed consent procedure for certain hazardous chemicals and pesticides in international trade]		Accepted.
TT	1 Scope	4	Ed	Change 'three' to 'four'	Replace 'three' with 'four'.		Accepted.
TT	2 Normative references	2	Ed	Change 'constitutes' to 'constitute'.	Remove 's' from 'constitutes'		Accepted.
TT	2 Normative references	8	Ed	Should the full name of the Rotterdam Convention be inserted?	Change to 'Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade'		Full name to be used in Foreword and normative references.
TT	2. Normative references	5	Ed	Should "The" before Basel Convention for consistency as is done for the other MEAs.	Include "The" before reference to Basel Convention		Accepted.
TT	2. Normative references	7	Ed	Should "The" before Rotterdam Convention for consistency as is done for the other MEAs.	Include "The" before reference to Rotterdam Convention		Accepted.
TT	2. Normative references	11	Ed	The acronym for GHS can be included here as Globally Harmonised System of Classification and Labelling of Chemicals (GHS) as this is the full definition of GHS.	Suggest including the acronym GHS so as to show its full definition when referenced here.		Accepted.

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GY	1	-	Te	The Scope should be expanded to include Ozone Depleting Substances.	<p>...It also gives specific terms, abbreviations and definitions related to five multilateral environmental agreements (Basel, Minamata, Rotterdam and Stockholm Conventions and the Montreal Protocol).</p> <p>This standard is limited to terminology for hazardous substances related to the Multilateral Environmental Agreements (MEAs) embodied in the Basel, Minamata, Rotterdam and Stockholm Conventions, and the Montreal Protocol).</p>	<p>Hazardous substances includes ODSs and definition is provided. MP was not in TOR. If MP is included in scope, a new set of definitions will have to be included and validated! Committee to decide.</p> <p>MP is one of the oldest protocol and the standards for terminology are well established globally and should have been adopted locally long ago.</p>	<p>Accepted.</p> <p>Add note to the Scope to include the Montreal Protocol.</p>
TT	3	Title	Ed	Insert 'the 'or remove 'of'	<p>General Terminology, Abbreviations, and Definitions applicable to any or all of [the] MEAs</p> <p>General Terminology, Abbreviations, and Definitions applicable to any or all [e] MEAs</p>		<p>Accepted.</p> <p>General Terminology, Abbreviations, and Definitions applicable to any or all of the MEAs</p>
TT	3 General Terminology ...		Ge	Terms associated with treaties, organisations etc., (accession, adoption, Conference of the Parties, GESAMP etc.) are interspersed between the technical/ chemical terms.	Consider separating the technical/ chemical terms from the terms associated with treaties, organisations etc., (accession, adoption, Conference of the Parties, GESAMP etc.)	Alphabetical order is used.	Accepted the consultant's comment.

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GY	3,4,5	-	Ed	There is inconsistency in the use of capitalisation in the titles of the clauses. Clause 3 is capitalised, Clauses 4 and 5 is not.			Accepted. Changes to be made by editorial committee.
GY	3	-	Te	The term "hazardous substance" itself should be defined.		"any material which, because of an inherent property, can cause harm to health, safety or the environment either directly or indirectly" – developed based on EU Taxation and Customs Union definition.	Accepted proposed definition for 'hazardous substance'. Amend 3.53 Hazard to recognize 'safety'.
GY	3	-	Ed	There is inconsistency in the use of periods/full stops at the end sentences in definitions. The document should be consistent on if it is following the ISO directives of no period or not.			Accepted. Changes to be made by editorial committee.
TT	3.5 acceptable risk		Te	Consider revising this definition to improve clarity.	The definition should make reference to probability and impact.	The definition already speaks to both probability and impact (disease or injury)	MB's comment was not accepted. Accepted explanation provided by Consultants.
TT	3.10 adoption	4	Ed	Consider including by negotiating Parties' to make the definition more complete.	Add 'by negotiating Parties'		Not accepted.
GY	3.95	-	Ed	There is incorrect spelling, a missed capitalisation and an opportunity for the use of a comma in the Note 1 to entry for the clause.	The clause should be amended to "Note 1 to entry: For the purpose of this standard, Material Safety Data Sheet is used interchangeably with Safety Data Sheet (SDS)."		Accepted proposed change.
BB	3.109	32-35	ge/te/ed	The language used in the definition seems very complex and could be simplified to help more readers comprehend the definition		There is no change proposed	Definition was taken from UNECE. Accepted the original definition.

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BB	3.110	39-42	ge/te/ed	<p>The Note 1 to entry statement appears to have omitted some of the Ozone Depleting Substances (ODS) listed under the Montreal Protocol on Substances that deplete the ozone layer. The chemicals hydrobromofluorocarbons and bromochloromethane are missing from the list.</p> <p>The list of categories of ODS presented should mirror what is stated in the Montreal Protocol on Substances that Deplete the Ozone layer which is the treaty that addresses management of ODS.</p>		<p>Add "but not limited to" after the word "include".</p> <p>The list of ODSs is not exhaustive.</p>	<p>Accepted proposed change.</p> <p>Note 1 to entry: Ozone-depleting substances (ODS) include but are not limited to chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), halons, methyl bromide, carbon tetrachloride, and methyl chloroform. ODSs are generally very stable in the troposphere and only degrade under intense ultraviolet light in the stratosphere. When they break down, they release chlorine or bromine atoms, which then deplete ozone.</p>
TT	3.12 aerosol	5	Ed	<p>Some streamlining of the Note 1 to entry can be possible. E.g. from "in a liquid state or in a gaseous state", it can be streamlined to "in a liquid or gaseous state" especially as the definition is already very long-winded.</p>	<p>Suggest streamlining last section of Note 1 to entry to "in a liquid or gaseous state". Also suggest including a semi-colon before "and fitted with a release device..." to show some level of separation in the explanation as it can easily get convoluted.</p>		<p>Changes to be made by editorial committee.</p> <p>Compare to other regional standards.</p>
TT	3.12 aerosol	6	Ed	<p>'s' in aerosols in Note 2 to entry is unnecessary as particles is already plural</p>	<p>Suggest removing 's' at end, from word aerosols for grammatical accuracy.</p>		<p>Changes to be made by editorial committee.</p>

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TT	3.17 bioconcentration	1	Te	It is suggested that bioaccumulation is included under the Stockholm Convention. Given that it is already included under Minamata, would it need to be included in this general listing as well?	<p>Include bioaccumulation under Stockholm Convention.</p> <p>Given that it is already included under Minamata, consider including bioaccumulation in this general listing – “3 General Terminology, Abbreviations, and Definitions applicable to any or all of MEAs”</p>	Included in section 3. It could then be removed from section 5.	<p>Accepted.</p> <p>Add proposed definition to section 3: Bioaccumulation is defined as the accumulation of chemicals in the tissue of organisms through any route, including respiration, ingestion, or direct contact and is measured through a bioaccumulation factor (BAF).</p> <p>Retain definition in section 5.</p>
BB	3.22	25	ge	The Montreal Protocol on Substances that deplete the ozone layer addresses the phase out of ODS and the Phase down of Hydrofluorocarbons (HFCs). It is noted that ODS were specifically pulled out as a broader category and then specific ODS were detailed. Does use of the word “chemical” meant to infer that HFCs and all other substances can be interpreted to be covered?		<p>ODS is defined.</p> <p>Chemical means all chemical compounds including HFCs</p>	Accepted consultant’s explanation.
TT	3.25 Conference of parties (COP)	1	te	Currently three separate terms are being used “international agreement”, “convention” and “treaty”. Noting that in 3.28 addresses both convention and treaty, should mention also be made to the term “international agreement” as this is used in the definition for COP?	Suggest that “international agreement” be included in the definition for convention/treaty or to show its inter-relation if there are differences associated, for the purpose of this standard.	Seems explorative rather than conclusive. It is understood that Conventions and Treaties are international agreements. A definition of “international Agreement” can be provided.	<p>Accepted.</p> <p>Definition to be provided.</p>
TT	3.28 Convention	1	te	There is a distinction with Treaties, in that Conventions tend to be narrower in scope/ are based on a particular issue. Should the distinction be included?	Distinguish between treaty and convention.	No	<p>Proposed change:</p> <p>Amendment to 3.25 Convention of Parties to be made.</p> <p><u>No changes to be made</u></p>
TT	3.30	1	ed	Insert ‘to’	Substance that can cause harm [to] living tissue		Accepted.

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TT	3.30/3.31		te	Some substances can cause damage to materials other than living tissue and metals	Suggest to include other materials in the definition	No specific change suggested. Alternative definition and source needed	Proposed definition of Corrosive: Causing harm or damage to living tissue and/or other materials by chemical reaction. Include notes to entry to address corrosion to living tissue and corrosive to metals. Consultant to review further. Remove 3.31 Corrosive to metals
TT	3.32 criteria		te	This definition should be revised.	The definition should make reference to standards by which something is assessed.	Proposed change is not specific. However, what it suggested seems to refer to the process by which a criteria is established/assessed and would not affect the definition.	Accepted explanation by consultant. Note: Criteria can be established in standards or regulations.
TT	3.38 End of life:	2	te	Can consideration be given to inclusion of a consumer perspective i.e. from a product lifecycle perspective?	Include a "product lifecycle" perspective.	End of life is not determined by the consumer. End of life means that some service or parts may no longer be available. The consumer usually continue to use the product after end of life. However, the definition is not affected.	Definition to be reviewed by consultant.
TT	3.50	1	ed	Change Liquefie[s] to Liquefie[d]	Code of the Construction and Equipment of Ships Carrying Liquefie[d] Gases in Bulk		Accepted.
TT	3.51	1	ed	Remove 'of' at the end of the sentence	The Joint Group of Experts on the Scientific Aspects of Marine Environmental Protection [e]		Accepted.

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TT	3.57 hazard label	2	te	There may be some room for ambiguity with current language, specifically in the part "...or to the outside packaging". Unlike the criteria before which specifies the "immediate container of a hazardous chemical" this additional criteria does not. Suggest making a small amendment to say "...or to <i>its</i> outside packaging" for absolute clarity. Further to this, does the use of "or" between the criteria for the immediate container and the outer packaging, negate the need for labelling on the immediate container? Would there be instances where the outer packaging is detached from the hazardous substance, within its life? Should it then be "and"? Reference is made to the Note of clause 7.9.3 of DCRS 81, which speaks to the need for some label elements needing to be accessible throughout the life of the product.	Suggest amending language in definition to "...or to <i>its</i> outside packaging" for absolute clarity by end-users. Give added consideration to use of "or" between the criteria for the immediate container and the outer packaging and whether this language would negate the need for labelling on the immediate container.	The definition is quite clear. There is no substantive change suggested. The matter was discussed in an earlier RPT meeting and a position adopted. There is no need for change.	MB's comment was not accepted. Accepted consultant's explanation. No change required.
TT	3.57 hazard label		ge	The terminology is not consistent within the clause.	Replace "a hazardous chemical" with "the hazardous substance, object or product".	Accept	Accepted. Review to ensure consistency with DCRS 81.
TT	3.73 IOMC	1	ed	Programme for en' the	Replace 'Program on' with 'Programme for'		Accepted. Already corrected in updated version.
TT	3.79 label		ge	The terminology is not consistent with Clause 3.57 (hazard label).	Replace "product" with "hazardous substance, object or product"	Accept	Accepted.
TT	3.82 LD ₅₀		ge	The meaning of the acronym is not included.	Include the meaning of the acronym as done in Clause 3.81. LD- Lethal Dose	Include (50% Lethal Dose) in the term to be defined	Proposed change was not accepted. Retain as is.

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TT	3.82 LD ₅₀		te	The definition should be revised for clarity.	The definition should make reference to the fact that this measures the short-term poisoning potential (acute toxicity) of a material, and that dermal and oral administration methods are most common.	The fact that it measures the short term poisoning potential can be conveyed in a "note to entry".	Accepted proposal for note to entry to be included. Include median lethal dose in note to entry.
TT	3.83 L(E)C ₅₀		ge	The definition is not clear.	Further explanation/ clarification is needed.	Not sure what is not clear.	Not accepted.
TT	3.89	1	ed	The definition should not include the word being defined.	Remove the word mixture from the definition.	Accept . " a composition of two or more substances in which the separate components do not react chemically"	Remove 3.89.
TT	3.89 mixture		ed	A better definition for mixture already exists in Clause 3.94.	Remove Clause 3.89.	Accept . " a composition of two or more substances in which the separate components do not react chemically"	Accepted proposed change by consultants.
TT	3.90 maximum exposure limit		te	It is not clear whether this is this over the person's lifetime.	Check whether the definition is complete.	The definition is from the UK Control of Substances Hazardous to Health (COSHH) Regulation and is concerned with work place exposure. The committee may consider a Note to Entry to give - 1. Long-term exposure limit: maximum exposure permitted over an 8 hour period 2. Short-term exposure limit: maximum exposure permitted over a 15 minute period.	Accepted proposal by consultant. Consultants to further review and compare definitions.
TT	3.94	1	ed	Mixture was defined in 3.89			3.89 mixture to be removed.
TT	3.95		te	Remove MSDS from definition list as GHS utilizes SDS only.	To align with international norms and GHS	The definitions do not relate only to GHS. MSDS is still used. The note to entry clarifies that it is the same as SDS.	Proposal accepted. MSDS will be placed under SDS as a note to entry. Remove 3.95 MSDS.

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TT	3.122 ratification, acceptance, approval		ge	Consider providing a separate definition for ratification.	Consider providing a separate definition for ratification.		Not accepted.
TT	3.126 Reservation:	3	te	This also applies to the Basel Convention (Article 26), the Rotterdam Convention (Article 27) and the Minamata Convention (Article 32).	Include that no reservations or exceptions may be made to the Basel Convention, the Rotterdam Convention and the Minamata Convention.	Accept	Accepted. "no reservations or exceptions may be made to the Basel Convention, the Rotterdam Convention and the Minamata Convention" will be included as a note to entry.
TT		1	te	It is suggested that a definition for 'Secretariat' is included.	Include definition of 'Secretariat'	Not needed. Would not add value	MB's comment was not accepted. Consultants explanation accepted
TT	3.131 Rotterdam Convention	2	te	Given that the Rotterdam Convention was defined, should the Basel, Minamata and Stockholm Conventions be included as well, or is this mainly to reflect the long title of the Convention?	Remove Rotterdam Convention from the Definitions. Include the long name of all the Conventions in the Foreword.	Committee?	Proposal accepted. Definitions for the conventions to be removed and only be in the Foreword and Normative References.
TT			te	It is suggested that a definition for 'Secretariat' is included.	Include definition of 'Secretariat'	See above	Not accepted.
TT	3.139	2	ed	Add a space between the words 'from' and 'the'	Impurities deriving from the		Accepted.

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TT	4.1 Alternative use:	1	te	A definition should be included for the "Ban Amendment" given its relevance to the Basel Convention.	Include definition of "Ban Amendment"	Specific definition and source not provided	Proposed term: Ban Amendment Proposed definition: An amendment to the Basel convention that provides for the prohibition of exports of all hazardous wastes covered by the Convention that are intended for final disposal, reuse, recycling and recovery from countries listed in annex VII to the Convention (Parties and other States which are members of the OECD, EC, Liechtenstein) to all other countries. Proposed term and definition to be added to the standard.
TT	4	2	te	A definition should be included for "Competent Authority" given the relevance under the Basel Convention.	Include definition of "Competent Authority"	Specific definition and source not provided	Consultant to include under 3.99 National Competent Authority a note to entry to address competent authority under Basel Convention.
TT	4.3 Disposal	2	ed	Amend the sentence to read ...use or 'alternative uses'	Add 'alternative uses'		Editorial committee to review.

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TT	4.3 disposal & 4.4 final disposal			Observation: It would seem that 4.4 is a less elaborated version of the first half of 4.3. 'operation that does not lead to the possibility of resource recovery, recycling, reclamation, direct re-use or alternative uses and includes depositing in or on land, release into water ways, incineration, physico-chemical treatment, permanent storage and so on, as outlined in Annex IV A of the Basel Convention' contradicts 'or operation that may lead to resource recovery, recycling, reclamation, direct re-use, or alternative use and includes use as fuel, recycling, recovery of components, and so on, as outlined in Annex IV B of the Basel Convention.'			Basel convention to be reviewed by Consultant for confirmation.
TT	4.3 disposal				Suggestion: Operation that may lead to resource recovery, recycling, reclamation, direct re-use or alternative use and includes uses as fuel, recycling, recovery of components and so on, as outlined in Annex IV B of the Basel Convention		
TT	4.4 alternative use.	1	te	Is this meant to be part of the definition of disposal?	Include as part of the definition of disposal.	Alternative use is defined in 4.1. Not sure what is being requested.	<u>No change is required</u>

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TT	4.4 final disposal				Suggestion: Operation that does not lead to the possibility of resource recovery, recycling, reclamation, direct re-use or alternative uses and includes depositing in or on land, release into waterways, incineration, physico-chemical treatment, permanent storage and so on, as outlined in Annex IV A of the Basel Convention	The definition makes reference to 4.3 which includes this full statement.	
TT			te	Include definition for 'reclamation'		Specific definition and source not provided	Consultant to identify a suitable definition of 'reclamation' for inclusion.
TT	4.5 Final Disposal	8	te	Should this be consolidated with the definition of recovery?	Include as part of the definition of recovery.	No.	Agreed with consultant's recommendation.
GY	4.6		te	Should the definition consider at which quantities or concentration a substance becomes a hazardous waste? What document was used to inform what is the definition for hazardous waste?		It is as given in the Basel Convention Glossary.	No change required. Accepted consultant's response.
TT	4.7 Hazardous Waste:	6	te	Given the specificity to the Basel Convention, should the relevant Annexes also be referenced? i.e. "Wastes that belong to any category contained in Annex I to the Convention, unless they do not possess any of the characteristics contained in Annex III"	Insert reference to the relevant Annexes.	The convention makes reference to its annexes. It is as given in the Basel Convention Glossary.	MB's comment was not accepted. Accepted consultant's comment.

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TT	4.8 Non – Waste:	1	te	Consideration should be given to the inclusion of a definition for "notification document" given the relevance to the Basel Convention	Include definition of "notification document"	May not be necessary	Proposed new term: Notification document Proposed definition: Written notification/declaration by the generator or exporter from a State of export sent through the channel of the competent authority of the State of export, to the competent authority of the States concerned of any proposed transboundary movement of hazardous wastes or other wastes as specified in Annex V A and Article 6. Accepted proposal for inclusion of new term and definition.
BB	4.9	29	ed	Spacing between the word "sound" and "manner" needs to be reduced			Accepted. Editorial committee to review.
GY	4.9	-	ed	There seems to be a double spacing in Note 3 to entry, between the words "sound" and "manner". Additionally, the word recognised is spelt with a "z" in the Note 5 to entry. It should be in an "s" in keeping with British spelling, if same is being used in the drafting of regional standards.	Use British spelling consistently throughout the document.		Accepted. Editorial committee to review.
TT	4.9 recovery			Justification: The definition for "final disposal" does not allow for recovery.	Suggestion: Note 3 to entry should state "Recovery and disposal" not "final disposal"		Consultant to review further along with Disposal and Final disposal.

Commented [CP1]: Confirm if z or s is the appropriate spelling to be used for 'recognized' or 'recognised'.

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TT	4.9 Recovery:	1	te	It is suggested that a definition for "Prior informed consent procedure" is included, given the relevance to the Basel Convention. Note-as this also applies to the Rotterdam Convention, consideration can be given to inclusion in the main text, noting though that there are variations between the two Conventions.	Include definition of "Prior informed consent procedure"	The convention does not define the term. No specific definition and source provided.	Consultant to reword as a definition, definition needs to cross referenced with Rotterdam Convention. Unified definition to be placed in General section.

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BB	4.11	11-14	ge	<p>In the case of ODS and Hydrofluorocarbons (HFC) that are used as refrigerants in the Refrigeration and Air Conditioning (RAC) industry there is a process of handling certain types of refrigerant waste known as reclamation. The "Guide on Good Practices in Refrigeration and Air Conditioning Servicing" produced by the ODS and HFC Management Programme of the Ministry of Environment and National Beautification Green and Blue Economy defines Reclamation as:</p> <p>"The process of returning used refrigerant to new product specifications. Chemical analysis of the refrigerant is required to determine that appropriate product specifications are met."</p> <p>Reclamation of spent refrigerant is an issue of interest for the region and has been a topic of discussion between National Ozone Officers of the Caribbean. Is reclamation meant to be captured under the heading "Refurbishment"? if so, then the issue of reclamation is covered as needed in the definition.</p>		Cannot make comment	Consultant to identify a suitable definition of 'reclamation' for inclusion.

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TT	4.15 Transboundary Movement of Waste:	1	te	A definition for 'transit' or 'state of transit' should be included given the relevance to the Basel Convention.	Include definition of 'transit' or 'state of transit'	No specific definition and source provided.	New term: State of Transit Definition: means any State, other than the State of export or import, through which movement of hazardous wastes or other wastes is planned or takes place. Accepted new term and definition.
TT	5 Specific terminology ...Mercury		ge	Some terms in this section are already included in Section 3 e.g. Clause 5.2.1, 5.6.	Terms that are already included in Section 3 should be removed.	No.	Remove 5.6 Criteria. Retain 5.2.1 as is.
GY	5.1	-	ed	The colon (:) is to be removed after the term being defined. Same is to be removed from Clauses 5.2, 5.2.1 and 7.13.			Accepted. Editorial committee to review.
TT	5.9 Elemental mercury (also expressed as Hg0 or Hg(0)):	4	te	It is suggested that a definition for 'emissions' is included given the relevance to the Minamata Convention.	Include definition of 'emissions' Proposed definition: Emissions of mercury or mercury compounds to the atmosphere.	Committee? Not sure of the meaning of atmosphere	Accepted. Proposed definition: discharge of mercury or mercury compounds to the atmosphere. Consultant to provide a general definition for 'emissions' to be placed in section 3.

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TT	5.	3	te	It is suggested that a definition for 'emission limit value' is included given the relevance to the Minamata Convention.	Include definition of 'emission limit value' Emission limit value proposed definition: A limit on the concentration, mass or emission rate of mercury or mercury compounds often expressed as "total mercury", emitted from a point source.	Not associated with clause 5.10 Not given in Convention or other docs but is suitable. Committee?	Accepted proposed definition
TT	5.	2	te	Focal Point should be included as this is language used under the Minamata Convention	Include definition of 'Focal Point'	Not associated with clause 5.12 "An official or agency designated by a government to serve as the focus or channel of communication for a particular issue or agreement."	Consultant to include convention specific definitions for 'focal point' and 'contact point' in the appropriate sections.
TT	5.17 meals per season		te	Further clarification is needed here.	Does this refer to human consumption of fish? What period of time constitutes a season?		MB's comment was not accepted.
TT	5	1	te	It is suggested that a definition for 'releases' is included given the relevance to the Minamata Convention.	Include definition of 'releases' Proposed definition: Release of mercury or mercury compounds to land or water	Not associated with clause 5.31 Committee?	Accepted proposal for new term 'releases' to be included in the standard. Proposed definition: Discharge of mercury or mercury compounds to land or water. <u>Include in Section 7 a definition for 'release' which will capture all substances discharged into land and waterways. Consultants to provide final definition.</u>

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TT	6	1	te	It is suggested that Designated National Authority is included as a definition.	Include definition of 'Designated National Authority'	Not associated with clause 6.3 No specific definition and source included	MB's comment was accepted, new term and definition to be included. New term: Designated national authority Proposed definition: One or more national authorities designated by a Party authorized to act on its behalf in the performance of the administrative functions required by the Rotterdam Convention.
GY	6.3 Export import	-	ed	The presentation of the title should be clearer. Is it that the definition the same for both words? Should there be a forward slash (/) or an "or" being placed between the words?			MB's comment was accepted. Proposed change: export and import.
TT	6	2	te	It is suggested that a definition is included for "import response" given the relevance under the Rotterdam Convention.	Include definition of "import response" Proposed definition: Decisions provided by parties indicating whether or not they will consent to the import of the chemicals listed in annex III of the convention and subject to the prior informed consent procedure.	The definition seems OK but what is the source	Accept proposed definition for inclusion in section 6.

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TT	6	2	te	It is suggested that a definition is included for prior informed consent procedure.	Include definition of 'prior informed consent procedure'	Specific suggested definition is needed. Committee?	Accepted new term: Prior Informed Consent Procedure Proposed definition for PIC procedure: is a mechanism for formally obtaining and disseminating the decisions of importing Parties as to whether they wish to receive future shipments of those chemicals listed in Annex III of the Convention and for ensuring compliance with these decisions by exporting Parties.
TT	7 Specific terminology ...Pollutants			Some terms in this section are already included in Section 3 e.g. Clause 7.5.	Terms that are already included in Section 3 should be removed.	No.	Remove 7.5 criteria and 7.14 vapour as they are defined in section 3.
TT	7.	3	te	It is suggested that a definition for 'acceptable purpose' is included given the relevance to the Stockholm Convention.	Include definition of 'acceptable purpose'	No specific definition and source included	Accepted proposed new term: Acceptable Purpose Proposed definition to be reworded. New proposed definition: To enable Parties to the Convention to take measures to reduce or eliminate releases of POPs from intentional production and use, for which alternatives do not exist yet or are not readily available, the Convention allows Parties to register specific exemptions for a specific period of time, as well as to register for acceptable purposes.

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TT	7.1			Document should indicate how the label will be affixed on a container 1. Securely fixed to the package 2. Clearly printed 3. Designed so that the information can be easily read 4. Designed so that the symbols are easily noticeable		This is addressed in the standard on classification and labelling. It was also discussed extensively in a previous RPT meeting.	MB's comment not accepted. Accepted consultant's explanation.
TT	7.2 biomagnification (or ecological magnification)	1	te	Should a definition for bioaccumulation be included given that it is one of the criteria for characterizing a POP?	Include definition of 'bioaccumulation'	Definitions. 3.17 and 5.3	MB's comment was not accepted. Definition already included in section 3.
TT	7.5 Competent authority:	1	te	This terminology does not apply to the Stockholm Convention (only applicable to the Basel Convention). It is suggested that it is deleted.	Remove definition of 'competent authority'.	Noted. Perhaps place this only in general terminology	MB's comment was not accepted.
TT	7.7 national focal point		ge	This definition is applicable to all Conventions to which the State is party.	Consider replacing "the Stockholm Convention" with "a Convention" and moving the definition to Section 3.	OK.	To be reviewed by the consultant.
TT	Table A.1		te	The table in this format is misleading. There is no relationship between items in each row.	The three groups of POPs (original, added 2009, added 2009-2017) should be listed one after the other instead of side by side.	Not technical Disagree.	MB's comment was partially accepted. No change to format of the table. The table is to become Informative and dated. A link to the latest POPs listing to be included in the table as a note.

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TT	7.7 Criteria:	2	te	It is suggested that a definition for 'exemption' is included given the relevance to the Stockholm Convention.	Include definition of 'exemption'	No specific definition and source included	<p>MB's comment was accepted. New term and definition to be included in the standard.</p> <p>Proposed definition: An exclusion from the scope of a convention,</p> <p>Note to entry 1: Parties register specific exemptions for a specific period of time. Annexes A and B to the Convention describe specific exemptions, as well as acceptable purposes, that are available with respect to the relevant POPs</p> <p>Note to entry 2: All registrations of specific exemptions shall expire five years after the date of entry into force of this Convention with respect to a particular chemical, which may be extended for a period of up to five years pursuant to a decision by the Conference of the Parties.</p>
TT	7.11 Official Contact Point OCP	2	te	Should a definition for 'persistence' be included given that it is one of the criteria for characterizing a POP?	Include definition of 'persistence'	<p>The definition is inherent in the POP definition.</p> <p>No specific definition and source included</p>	<p>MB's comment accepted.</p> <p>Proposed term and definition: Persistence The capacity of a substance to remain chemically stable. To be placed in Section 3.</p>

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TT	7.12 Persistent Organic Pollutants: POPs Note 2 to entry:	2	te	It is suggested that a definition for the Persistent Organic Pollutants Review Committee is included	Include definition of 'Persistent Organic Pollutants Review Committee'	Perhaps. But No specific definition and source included	MB withdrew their comment.-
TT	7.14 Unintentionally produced POPs UPOPs	1	ed	It is suggested that the sentence is edited as follows: (UPOPs) are POPs 'and therefore have dangerous effects on the environment and human health. UPOPs' 'that' are emitted	Remove 'and therefore have dangerous effects on the environment and human health. UPOPs' Add 'that'	The suggested change does not add value.	MZB's comment was not accepted.-
TT	7.14 Unintentionally produced POPs UPOPs	3	ed	'They therefore have dangerous effects on the environment and human health. UPOPs'	Add ' They therefore have dangerous effects on the environment and human health. UPOPs'		MB's comment was not accepted.-
TT	ANNEX 1 List of Persistent Organic Pollutants (POPs) as published by the Stockholm Convention	Column 3 Added (2009 – 2017)	te	This list should be amended to include POPs listed up to the 2023 BRS COP.	Include POPs listed up to the 2023 BRS COP.	Any additional list of POPs should be included. The Insecticide "Methoxychlor" should be added to the table as a 2023 addition to the POPs list.	MB's comment was partially accepted. No change to format of the table. The table is to become Informative and dated. A link to the latest POPs listing to be included in the table as a note.

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TT	3.19 best available technique (BAT)			Justification: The present wording specifies that the BAT must be advanced (implying a new innovation), which is not necessarily the case	Suggestion: 3.19 most effective and advanced technique, the environmental impacts of which are limited or that method that displays the best efficacy for the lowest environmental impact		MB's comment was not accepted. Retained original definition.
TT	3.22 chemical			Justification: The definition given for "chemical" in clause 3.22 is as a noun but should also include a definition as an adjective, as the terms chemical action & chemical reaction are used multiple times in these definitions	Suggestion: 3.22.1 relating to the interactions of substances as studied in chemistry	Not necessary: Since chemical action or chemical reaction means action or reaction by a chemical. Does not add value	MB's comment was not accepted. Retained original definition.
TT	3.30 corrosive			Justification: The word corrosive here is meant to be the adjective, not the substance itself but describes the effect of the substance upon contact with living tissue	Suggestion: Either change the term to "corrosive substance" or change the definition to "the ability of a substance to cause physical damage to living tissue, such as the skin, mucosa or eye balls, by natural chemical reaction"	Agree. Change the term to "corrosive substance"	MB's comment partially accepted. Proposed definition of Corrosive: Causing harm or damage to living tissue and/or other materials by chemical reaction. Include notes to entry to address corrosion to living tissue and corrosive to metals. Consultant to review further. Remove 3.31 Corrosive to metals

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TT	3.89 mixture, 3.94			Justification: There doesn't seem to be any distinction between 3.89 & 3.94 and may be better combined into a single clause.	Suggestion: a substance or solution composed of two or more non-interactive components	Already addressed	3.89 mixture to be removed.
TT	3.128 risk			Justification: Risk should extend beyond individual persons to include animals, plants and both built and natural environments.	Suggestion: likelihood of a negative result or outcome as a result of exposure to a hazardous substance, that has the potential for harm to the health of persons, animals, plants and the environment, as attained under the conditions of use and exposure and must include the potential extent of the harm	Good value adding suggested change.	Accepted proposed definition.
TT	3.138 solid			Justification: Assuming that this standard is to deal with all manner of hazardous substances in whatever form they may be in, whether initially or subsequently, in the course of use. Harmful substances that can cause injury or sickness when inhaled, consumed or absorbed through the skin	Suggestion: substance or mixture which does not meet the definitions of a liquid, gas, plasma or any of the exotic forms	Highlighted part may not be appropriate as definition for exotic form would be needed and this may include solid.	Retained original definition.

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TT	3.146 toxic			Justification: The word "toxic" is in reference to the poisonous nature of a material, not the material itself.	Suggestion: The ability of a substance when inhaled, consumed or absorbed through the skin to cause injury, illness or death by poisoning or corrosive action to the organism.	Accept	Accepted proposed definition for toxic. New definition to be included: toxic substance Proposed definition: harmful chemical(s) or mixture(s) that can cause injury or sickness when inhaled, consumed or absorbed through the skin Note 1 to entry: Many toxic substances have previously caused illness, including birth defects and cancer. New term to added to section 3: toxicity Consultants to propose definition for 'toxicity'.
TT	1			Once chemical is classified as dangerous, it should be in table format inclusive of a symbol letter indicating the associated danger /risk and the accompanying safety measures.			Noted.
TT	3			a. Risk (risk phrase): simple information about the hazard of a chemical in normal use should be included.			Noted.
TT				b. S (safety phrase): advice on safety precautions appropriate to the risk of a particular chemical in use			Noted.

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