



*“Working Together to Make Trade Work”*

**NAEGA MAP Trip Report – UN GHS Subcommittee Meeting –  
Geneva, Switzerland**

**Name of Traveler:** Jess McCluer, NAEGA Volunteer

**Dates of Travel:** December 6-9, 2016

**Purpose of Travel**

Consistent with advancing its NAEGA UES objectives related to engagement with international regulatory bodies on the regulation of combustible dust, NAEGA Volunteer Jess McCluer traveled to Geneva, Switzerland on December 6-9, 2016. In Geneva, Mr. McCluer participated in a meeting of the United Nations Globally Harmonized System (GHS) subcommittee and Dust Explosion Hazards Correspondence Group (CG). In Geneva, Mr. McCluer monitored developments in the Correspondence Group and at the Subcommittee, reported on the effects that amendments to the GHS could have on the global bulk grain trade and provided recommendations for action. This report and future related actions will be used to inform NAEGA’s UES accomplishment in 2017.

*Background*

Mr. McCluer is a very experienced subject matter expert and was made available for this travel assignment by his employer and NAEGA partner association the National Grain and Feed Association. Mr. McCluer also cooperates and coordinates his work with the International Grain Trade Coalition (IGTC).

Over the past few years NAEGA, working under credentials from the International Dry Bulk Terminals Group (IBTA), has been engaging with the UN GHS Subcommittee on the classification of grain as an explosive material. Parties at the GHS have proposed classifying grain as combustible under a proposed chapter to the GHS. Through NAEGA efforts and coordination with likeminded countries, the GHS is now moving forward with a non-binding guidance annex to that focuses on mitigating combustible dust hazards.

**Summary of Findings**

Activities in Geneva began on Thursday, December 8 with a meeting of the CG. Also attending the meeting was IGTC colleague June Arnold of the Grain and Feed Trade Association (GAFTA). NAEGA and the IBTA have been working closely with GAFTA on combustible dust issues within the Correspondence Group. Julio Ruffa (Nidera in Argentina and technical expert for the Argentinian delegation) attempted to join the meeting via conference call but was unable to due to technical difficulties.

Participants reviewed the respective hazard communication labeling summaries that the U.S. and Canada provided to the CG. The summaries were intended as thought starters for how a reference to labeling could be included in the annex. During the discussion, Mr. McCluer reminded the group on how the differences in the requirements may be disruptive for the grain movement and on how grain and feed products are currently labeled as opposed to unique labeling requirements and exemptions in both the U.S. and Canada for food products. In the U.S., whole grain is classified as a hazardous chemical, and since the CG is in the process of developing a non-binding annex, it



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should not focus on the classification of products. Mr. McCluer recommended language used in the U.S. Safety Data Sheets for whole grain that could be included in the annex to differentiate between dust and whole substances.

Following the labeling discussion, the group then went through and reviewed the informal paper, line by line. Overall, the changes were fairly minor. Most of the changes included wordsmithing and modifications to highlight that the language, flowcharts and descriptions are intended as guidance. Further, the CG Chairman asked for Mr. McCluer’s input on several topics to make sure that the grain industry was satisfied with the CG’s suggestions. Further, the CG Chairman also suggested that the group consider feedback from Argentina before making any final changes.

The CG still has much of the document to review before a formal paper can be submitted. Since the deadline for submitting a formal paper for review at the July 10-12, 2017 GHS sub-committee meeting is April 7, the CG Chairman will forward proposed dates to schedule conference calls to continue the reviewing process. Most likely, the next call will be in late January/early February. It is anticipated that the informal paper will be introduced at the subcommittee’s July meeting and the formal paper at the December 2017 meeting.

During the UN GHS sub-committee meeting, which took place throughout the meeting of the Correspondence Group from December 7-9, the Chairman of the UN GHS Sub-committee, Maureen Ruskin of the U.S. delegation, was nominated by Canada to continue as Chairman in the 2017-2018 biennium. The U.S. then nominated Robin Foster, U.K. delegation to continue as co-chair. Both motions were seconded and formally approved by the GHS sub-committee with no opposition.

Overall, both the GHS subcommittee and CG meeting were productive and our continued participation has played a key role in making sure that the non-binding annex will be as broad as possible and not pose an undue burden on the grain handling industry once included in the GHS.

**Recommendations**

NAEGA should continue to participate in the GHS subcommittee and the Dust Explosion Hazards Correspondence Group. NAEGA, along with other IGTC members including GAFTA, should continue to work with Argentina to make sure the language in the non-binding annex is not burdensome for the grain handling industry.

**ATTACHMENTS**

- Agenda – Thirty-second Session of the UN GHS Sub-committee of Experts on the Transportation of Dangerous Goods
- List of participants of the Correspondence Group
- Final Report – GHS 30