Proposed risk assessment methodology for hazardous substances

Submission Reference no: 1

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[redacted]

Submitter Type: Not specified
Source: Web Form

Overall Notes:

Clause
4. Are the technical aspects correct? (please reference page numbers as appropriate)
Position
No
Notes
The identification of hazardous material may not be sufficiently comprehensive and doesn't address indirect hazards: a) Size issues - the impact of particle size (e.g. micro-beads are non-toxic but the consequences ot their use are still harmful to the environment) and shape (e.g. apparently the rod-shape of asbestos particles causes asbestosis), b) Hazard life-time (half-life?) - non-degradable material accumulates in the environment (plastic in the ocean) and bio-degradation of material produces green-house gas emissions. c) Disposal requirements - specific disposal performance requirements (e.g. incomplete incineration of some material results in dioxin emissions)

Clause
11. When used in conjunction with the external guidelines for each model, is any further clarification required to be able to perform a risk assessment? (please reference page numbers as appropriate)
Position
Yes
Notes
Please clarify that the hazard class definitions based on flammability are not specifically relevant for the classification of hazardous area zones (EEHA).

Clause
I would like my personal information (other than my name) to be withheld from any publicly available response documents.
Position
Yes
Notes