



PRO-3.4-0000-0-01 Hazardous Chemicals Procedure (Excluding Refineries)

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To review changes, refer to the 'Version Summary' at the end of this document.

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1. Purpose

To describe how the ANZ MS&L business will protect the health, safety, security and environment of BP employees and contractors when working with Hazardous Chemicals at a BP facility, in line with OMS Element 3.4.

In addition, this Procedure aims to describe the processes that must be followed in order to adhere with legislative requirements relating to the safe storage and handling of Hazardous Chemicals in the workplace. This Procedure covers chemicals previously known (or still referred to in some legislation) as Hazardous Substances and Dangerous Goods.

This procedure specifically details the requirements of the following document:

Group Guide: Managing Industrial Hygiene <u>GG 3.4-0011</u>

2. Scope

The requirement specified in this procedure applies equally to BP employees, contractors and visitors engaged in the ANZ MS&L business. Principle Contractors are required to manage health risks associated with the use of hazardous chemicals when working for BP in accordance with local regulatory requirements and BP contractual terms.

Specific sites, areas and activities may have more detailed OMS requirements and where these exist the requirements will be specified in local procedures, safe work instructions, manuals, handbooks or specific standards.

Chemicals exempted from this procedure include:

- Hazardous chemicals in batteries when incorporated in plant;
- Substances that are consumer products to be used in quantities, and ways, consistent with household use;
- Fuel, oils or coolants in a container fitted to a vehicle, vessel, aircraft, mobile plant, other device, if the fuel, oil or coolant is intended for use in the operation of the device;
- Fuel in a fuel container of a domestic or portable fuel burning appliance, if the quantity of fuel does not exceed 25 kilograms or 25 litres;
- Hazardous chemicals in portable firefighting or medical equipment for use at the workplace;
- Hazardous chemicals that form part of the integrated refrigeration system of refrigerated freight containers;
- Potable liquids that are consumer products at retail facilities;
- Food and beverages within the meaning of the Food Standards Australia New Zealand Food

- Standards Code that are in a package and form intended for human consumption;
- Tobacco or products made of tobacco;
- Therapeutic goods within the meaning of the Therapeutic Goods Act 1989 at the point of intentional intake by, or administration to, humans.
- Personal products (shampoo, soap, sun screen, insect repellent, etc.), medications;
- Radioactive chemicals.

3. Terms, Definitions and Abbreviations

ANZ MS&L	Australia and New Zealand (ANZ) Marketing, Supply & Logistics
	(MS&L) businesses.
	A risk reduction measure that prevents a cause developing into a
Barrier	risk event or mitigates the consequences (impacts) of a risk event once it has occurred.
	Barriers are fully functional and independent of each other.
Chemicals register	A documented list of workplace chemicals used on the facility (must include hazardous
enernouis register	chemicals as a minimum).
	A category system for classifying Hazardous Chemicals based on
	the nature of a physical, health or environmental hazard under the GHS.
	For example:
	Class 1 – Explosive;
	Class 2 – Gases;
	Class 3 – Flammable Liquid;
Class	Class 4 – Flammable solid;
	Class 5 – Oxidising Agent;
	Class 6 – Toxic;
	Class 7 – Radioactive;
	Class 8 – Corrosive; and
	Class 9 – Miscellaneous (eco-toxic)
	Someone who because of relevant qualifications and experience
Competent person	would be recognised by government authorities or professional bodies as competent
	to carry out particular work
Facility	A Bulk Fuel Terminal, Depot or Retail Site.

Table 1: Terms, Definitions and Abbreviations

Government Notice	 Any Notice received from Workplace Health and Safety regulatory authorities and correspondence which we submit to the authorities. These include: Warning letters detailing an alleged breach; Fines for breach of regulation / legislation; Breaches in Hazardous Chemicals storage and handling licenses; Penalty notices; Improvement notices; Prohibition notices; Licence changes / amendments; or Notification of storage and handling of Scheduled Hazardous Chemicals and Manifests (Schedule 11 and 15). These items are mandatory
	reportable on a quarterly basis via the Orange Book and therefore shall be entered into IRIS when received.
GHS	Globally Harmonised System of Classification and Labelling of Chemicals
Hazardous Chemical	A substance, mixture or article that satisfies the criteria for a hazard class in the GHS but does not include a substance, mixture or article that satisfies the criteria solely for one of the following hazard classes:
HSSE	The Health Safety Security & Environment team that report to the HSSE Manager for Sales and Marketing ANZ, including any technical expertise that the HSSE team may engage.
Impact	The harm to people, the environment, BP's reputation, assets or business impact if a risk event should occur.
Legal and Regulatory Requirements	Obligations established by applicable legislation, regulation, administrative order or notice, permit, consent decree or any other similar instrument, and any legally binding commitment entered into by BP, where failure to comply by BP is unlawful and enforceable by a court of law in the relevant jurisdiction.

Major Hazard Facility (MHF)	In Australia, a facility at which certain chemicals (as defined by local legislation) are present or likely to be present in a quantity that exceeds their threshold quantity; or that is determined by the Regulator to be a MHF. New Zealand has introduced a two tier MHF legislation in 2016. (Health and Safety at Work (Major Hazard Facilities) Regulations 2016)
Manifest	Summary information on site relating to specific hazardous chemicals that are used, stored or handled in quantities that exceed prescribed limits in the local legislation.
PPE	Personal Protective Equipment
SDS	Safety Data Sheet (previously known as a Material Safety Data Sheet (MSDS)).
WHS Regulations	The Work Health and Safety Regulations- used in this document to provide examples of legislation that is applicable in Australia. Note- as all jurisdictions have not adopted the WHS local regulation must be consulted

4. Roles and Responsibilities

The roles and responsibilities associated with this procedure are listed in the following table.

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		Implementing this Procedure within their business area by delegating specific responsibilities to personnel within the business (e.g. HSSE Team, Facility		
	Managers, etc.) including:			
	•	Ensuring that responsibilities are defined and documented. This includes		
		describing how Hazardous Chemicals are stored, handled and disposed of		
		within their business.		
	•	Ensuring local requirements relating to the development and maintenance		
		of a Chemicals Register and / or Manifest are met for facilities under their		
Business Manager		area of responsibility.		
	•	Ensuring Facility Risk Registers contain up to date risks for the stored and		
		handled Hazardous Chemicals at the facility.		
	•	Approving barriers and ensuring appropriate resources are allocated to		
		implement any required barriers.		
	•	Ensuring that facilities that store Hazardous Chemicals have submitted the		
		necessary Government Notices to the Regulator / licensed in accordance		
		with local regulations.		
	•	Provide technical HSE advice to both the Facility Manager and Business		
		Manager to manage health, safety and environmental risks and meet		
		legislative requirements related to hazardous chemicals,		
HSSE	•	Determine when and how health monitoring is to be conducted and		
пээс 		maintain results and reasons for initiating in accordance with BP		
	•	Notify the worker of the results of any related health exposure information		
		(e.g. exposure monitoring results).		
	•	Inform the regulator when required relating to health exposures.		

Table 2: Roles and Responsibilities

	•	Ensure that all persons who handle Hazardous Chemicals at a facility have
		access to the relevant current SDS, risk assessments and Facility Risk
		Register. (Note: In NZ a SDS must be available within ten minutes of
		request).
	•	Ensure that all Hazardous Chemicals used routinely on the facility are
		included on the facility Chemicals Register and/ or Manifest of Hazardous
		Chemicals.
Facility Manager and/or	•	Ensure the introduction of new Hazardous Chemicals to BP facilities are risk
Person in charge of		assessed and approved prior to entry on the Facility.
contract work (excluding	•	Ensure that persons handling Hazardous Chemicals are trained to
where contractors are		understand and follow the requirements of the SDS and risk assessments
engaged by a non-BP		before handling the chemical.
Principle Contractor)	•	Ensure all Hazardous Chemicals stored are labelled clearly and accurately
		in accordance with the procedure.
	•	Ensure any risks arising from the storage and handling of hazardous
		substances are controlled as far as is reasonably practicable.
	•	Ensure the effectiveness of controls are regularly reviewed and updated
	•	Dispose of Hazardous Chemicals in accordance with the procedure
	•	Ensures an Emergency Management Plan is in place and is effective
Es silita Demonsad	•	Follow the directions of this Procedure, the Facility Manager, SDS and risk
Facility Personnel		assessments for chemicals they use.
	•	Authorise the issue of this procedure;
HSSE Manager	•	Authorise deviations to this procedure.
	•	Content owner of this procedure;
OMS Manager	•	Ensure the contents of this procedure are current;
	•	Communicate any changes or additions to this procedure.

5. Methodology

5.1. General

The management of Hazardous Chemicals aligns with the risk management approach outlined in PRO-3.1-0001-0-01 HSSE Risk Management Procedure – with assessed risks included in the Facility Risk Registers.

All employees that potentially handle hazardous chemicals on BP premises will be provided adequate instruction and training, while those that visit sites where they are stored will be provided with an induction and supervision to ensure their safety. Third parties involved in the delivery or other handling of dangerous goods are to adhere to relevant contractor management requirements.

Certain hazardous chemicals are prohibited or restricted while some chemicals require approval from the regulator prior to being used, stored or handled. Schedule 10 of the WHS Regulations provides a list of such chemicals- however local legislation should be consulted.

No person at the workplace should be exposed to chemicals in an airborne concentration that exceeds its exposure standard as listed in the Exposure Standards.

5.2. Hazard Identification

All Hazardous Chemicals that are stored, handled, used or generated at BP workplaces shall be identified to enable associated risks to be effectively managed. The identity of chemicals in the workplace can usually be found by reading the SDS and label of each product.

The identification of hazardous substances should consider chemicals generated at site (such as byproducts or waste), chemicals found within plant (such as piping systems) and chemicals introduced to site (such as in project or maintenance work).

5.2.1. Chemical Register/Inventory

All hazardous chemicals used on BP premises should be identified and listed on the workplace chemical register, or a chemical register established for works conducted on site. Exceptions are:

- 1. those that are in transit for less than 5 days, and
- Substances that are consumer products to be used in quantities, and ways, consistent with household use. Also includes hazardous chemicals used in the office (i.e. toner, whiteboard cleaners).

The chemical register must be readily accessible to anyone likely to be affected by the hazardous chemical at the workplace including employees, contractors and visitors.

5.2.2. Safety Data Sheets and Product Labels

Any hazardous chemical on site must have an SDS that is less than 5 years old, as per its date issued. The SDS must be readily accessible to any person likely to be exposed to the hazardous chemical and be kept in a known and identifiable location.

All hazardous chemicals, the containers of hazardous chemicals or hazardous chemicals in pipe work on site must be labelled in English, be legible and contain risk and safety phrases. Substances transferred into a second container where the contents are not used immediately must also be labelled.

Substances of uncertain identity must be disposed of from site in accordance with relevant waste management requirements.

5.2.3. Hazardous Chemical Manifest and Placard

The principle purpose of the manifest and placards is to provide the emergency services organizations with information on the quantity, classification and location of hazardous chemicals at the workplace.

5.2.3.1. Manifests:

Hazardous Chemicals handled or stored on site in quantities that exceed the manifest threshold amounts outlined in local legal and regulatory requirements (i.e. Schedule 11 of the WHS Regulations table 11.1) shall be recorded in a Hazardous Chemical Manifest. The manifest must adhere to any local legislative requirements (such as the requirements of Schedule 12 of the WHS Regulations). As a minimum the manifest should contain the following information:

- Product name; Proper shipping name; UN number; Supplier Name;
- Emergency contact details for at least 2 people in the event of an emergency at site
- Container size & type and number of containers;
- Maximum quantity of the Schedule 11 hazardous chemical held on site; and,
- Site plan, showing location of containers.

5.2.3.2. Placards:

Where Hazardous Chemicals are handled or stored on site in quantities that exceed the Placard threshold amounts in local legal and regulatory requirements (i.e. Schedule 11 of the WHS Regulations) the workplace shall prominently display placards. The Placards must adhere to local requirements (i.e. as defined in Schedule 13 of the WHS regulations).

Note:

- Outer warning placards are not required for retail fuel outlets
- Where placards are required, they shall display the relevant dangerous good label (or diamond), not the corresponding GHS pictogram.

5.3. Risk Assessment

A separate risk assessment is not required for hazardous chemicals used on site where the hazards and associated risks are well known and have well established and accepted control measures.

However, where such hazards and risks are not understood it is recommended that a risk assessment is conducted by a competent person in consultation with relevant members of the workforce. The SDS and product labels provide the technical information required for the risk assessment.

Where the workplace, tasks and hazardous chemicals are identical in characteristics, properties, potential hazards and risks, the same basic risk assessment can be applied across multiple similar work activities and sites.

5.3.1. Consideration in Risk Assessments

Risks associated with hazardous chemicals can be divided into 2 categories:

- 1. Health risks to those exposed- These can be short or long term risks associated with the toxicological properties of the chemical.
- 2. Safety risks to persons or property due to the physiochemical hazards.

5.3.1.1. Considerations when assessing health risk

- The routes of entry by which the chemical can impact health,
- The physical form (dust/ solid etc) and concentration,
- The chemical and physical properties of the substance,
- Determining who could be exposed, and when this could occur,
- How often is exposure likely to occur and for how long?
- What is the estimated exposure to the hazardous chemical?

Where there is a potential for people at the workplace to be exposed to a substance or mixture in an airborne concentration that exceeds its exposure standard, a competent person should be engaged to conduct air monitoring. If the results of this monitoring show concentrations approaching or exceeding the exposure standard additional controls will be required to address this risk.

5.3.1.2. Considerations when assessing physiochemical risks

- Potential for fire and explosion (combination of flammable or combustible substance with oxygen source and ignition source)
- Offsite risks (activities, systems of work, structures and equipment not directly involved in the handling or storage of hazardous chemicals may create risks)
- Risks from Corrosive substances
- Compressed gases (risks of fire, explosion, toxicity, asphyxiation, oxidation or uncontrolled release of pressure).

- Asphyxiation hazards (lack of oxygen arising from consumption of oxygen in the air, accumulation of gases that displace oxygen or inhalation of chemicals that affect the body's ability to use oxygen)
- Compressed Air (sudden release can cause risks to hearing and cardiovascular issues if the skin is penetrated)

5.4. Risk Controls

5.4.1. General Approach to Controls

Risks must be reduced as far as is reasonably practicable, and at least to a level below the National Exposure Standard. A competent person should be engaged to determine appropriate controls. Controlling the risks associated with Hazardous Chemicals shall follow the hierarchy of controls:

- Elimination of the hazard and associated risk is always the first aim (i.e. purchasing practices)
- **Substitution** (of a hazardous chemical with a chemical that presents a lower risk), **isolation** (of the chemical from workers or segregation of one chemical from another)
- Implementing engineering controls (such as those to minimize the generation of chemicals, suppress or contain chemicals or limit the area of contamination in the event of spills and leaks) are next to minimize the risk if elimination is not possible
- Administrative controls (such as work instructions, signage, restricted area policies and cleaning facilities) must be implemented as far as reasonably practicable if a risk remains. These controls should always be supported by training and supervision to ensure they are effectively implemented
- Suitable **Personal Protective Equipment** (PPE) must be used to minimize any remaining risk. All PPE must be fit for purpose and maintained in clean, hygienic working order.

5.4.2. Specific Control Measures

- Take steps to prevent ignition sources into a hazardous area where there is a possibility of it causing a **fire or explosion**. This can be achieved by:
 - · Separating and segregating incompatible materials
 - Reducing quantities of flammable and combustible materials.
 - · Eliminating ignition sources (such as from hot work, electrical safety controls)
 - Reducing vapor emissions
- Take steps to ensure that hazardous chemicals do not become unstable, decompose or change to create a new hazard (i.e. follow SDS instructions on proportions of ingredients such as solvents, use of stabilizing agents, storage temperatures, exposure to moisture etc).

- Ensure that structures or plant used for the storage or handling of hazardous chemicals are protected from damage. This can be achieved by locating them away from trafficable areas, preventing vehicle access or installing crash protection measures (such as bollards).
- Ensure that there is a **spill containment system** in place wherever there is the risk of a leak or spill of a hazardous chemical. The spill containment system must:
 - describe how to clean up and dispose of the spill or leak safely (i.e. not use incompatible chemicals).
 - · Be large enough to ensure that spills can be held safely until cleaned up
 - Where bunding is required, adhere to the relevant Australian Standard specific to the type of hazardous chemical (i.e. AS1940: The storage and handling of flammable and combustible liquids) and in consultation with the emergency services authority
- Take steps to mitigate the risks associated with transferring hazardous chemicals from one storage container to another. The risk is often elevated in these scenarios as the chemical will often be unconfined and can be controlled using many of the measures above. Additional control considerations are:
 - · Steps to avoid overflow or spillage
 - Providing emergency shut-offs to contain any loss of containment
 - Reducing static electricity and vapor generation
 - Installing flow and pressure regulators
 - · Implementing systems for detecting losses from pipe works and fittings
- Ensure that risks associated with compressed gases are controlled. This includes steps to
 maintain the integrity and safety of the cylinders in how they are stored and transported.
 Information relating to controlling risks from compressed and liquefied gasses can be found in
 Australian Standards including: AS/NZS 1596: The storage and handling of LP Gas and AS 4332
 The storage and handling of gasses in cylinders.
- Take steps to minimize the **risk of asphyxiation** by:
 - Avoiding work carried out in oxygen-depleted (<19%) atmospheres- i.e. by testing the atmosphere using a gas monitor
 - · Keeping the work area well ventilated
 - Purging
 - · Using an air supplied respirator- particularly in confined spaces
 - Checking the integrity of cylinders, fittings, hoses and connections that may leak gases.

5.4.3. Requirements to Notify the Regulator

Each jurisdiction has notification/ licensing requirements relating to the storage of manifest quantities of hazardous chemicals/ dangerous goods (i.e. refer to WHS regulations Schedule 11). Typically, this is required within 14 days of any change or every 5 years. The information generally required by the regulator is:

- The name of the occupier
- The address of the premises where the respective chemicals are stored
- Contact details of the occupier
- Nature of the principal activities involving the hazardous chemical/ dangerous good.
- Class and maximum quantities of hazardous chemical/ dangerous good stored
- Descriptions, details and maximum quantity of C1 combustible liquids stored
- Product name and maximum quantity of goods too dangerous to be transported.

The Facility Manager shall be responsible for ensuring the facility is appropriately licensed, registered and / or notification is provided to the local Regulatory Authority as required by the state legislation.

5.4.4. Disposal

Hazardous Chemicals must be disposed in accordance with relevant safety and environmental legislative requirements. For disposal requirements, refer to the SDS or local applicable hazardous waste management procedures.

5.4.5. Maintenance and Construction Work or other Similar Activities

Risks associated with hazardous chemicals during maintenance and construction work, and other similar activities, is controlled in accordance with Control of Work requirements as defined within PRO-4.5-0001-0-01 Control of Work.

5.5. Monitoring and Review

5.5.1. Health Monitoring

Health Monitoring will be provided to workers whose health is placed at significant risk due to exposure to:

- hazardous chemicals referred to in Schedule 14, table 14.1 of the WHS regulations
- hazardous chemicals not in Schedule 14 where it is uncertain if the biological exposure standard has been exceeded; and

there is a valid technique to detect the effect of the worker's health; or there is a valid way of determining biological exposure to the hazardous chemical.

The type of Health Monitoring shall be determined by a competent person in consideration of Schedule 14 of the WHS Regulations.

Health monitoring is an approach to determine if the control measures put in place are effective at keeping exposures from harming the health of workers. If the results of health monitoring indicate that the worker is experiencing signs of exposure to a hazardous chemical, then approaches to minimize the worker's risk of exposure shall be reviewed.

BP conducts its health monitoring through its preferred medical providers, and will:

- inform workers about health monitoring requirements
- Provide a copy of the health monitoring report to the worker as soon as practicable.
- Provide a copy of the report to the regulator if the report contains test results that indicate the worker may have contracted a disease, injury or illness or recommends remedial measures as a result of the work that triggered the health monitoring.
- Maintain any reports as a confidential medical record as per WIN 3.4-0004-0-02 Management of Medical Records.

5.5.2. Reviewing Control Measures

Controls associated with Hazardous Chemical risks will be reviewed when the Facility Risk Register is reviewed annually (ref: PRO-3.1-0001-0-01 HSSE Risk Management Procedure) and / or when indicated, such as:

- The risk assessments/ controls are identified as inadequate following an investigation (such as post incident/ safety observation/ inspection/ health monitoring findings) or
- Atmospheric monitoring indicates that the airborne concentration of a hazardous chemical exceeds the exposure standard.

5.6. Emergency Management

The occupier of a facility that stores and handles Hazardous Chemicals must establish an emergency management plan for that facility.

Where the quantity of hazardous chemicals on site exceeds the manifest quantities the emergency plan must be provided to the emergency services organization and make revisions based on recommendations from this organization about its effectiveness. The purpose of the emergency plan is to plan for, and thus minimize the effects of any dangerous occurrence or near miss at the workplace resulting from handling of hazardous chemicals.

For any site that uses hazardous chemicals emergency equipment should be provided, maintained and readily available to respond to an emergency, contain and clean up spills and assist workers in conducting emergency procedures safely.

Fire protection and firefighting equipment and systems are designed in consideration of the hazardous chemicals and associated risks on site, and this is properly installed, tested and maintained.

6. Verification

A verification program shall be implemented to ensure compliance with the requirements of this procedure. Findings of the verification program will in turn be used to drive risk reduction and performance improvement.

Verification activities will involve meeting with Stakeholders annually in Retail, Asset management and Midstream to ensure:

- 1. that requirements of this procedure are captured in local procedures/ tools:
 - a) Retail Hazardous chemical and Dangerous Goods Procedure
 - b) Control of Work Procedures and supporting verification tools/ processes
 - c) Contractor management procedures and supporting verification approaches
- 2. That requirements of this procedure are captured in local level verification approaches (self-verification checks/ audits)

Refer to <u>PRO-8.2-0001-0-01 MS&L Self Verification Procedure</u> for further details to developing self-verification protocols.

7. Associated Documents

The following associated documents:

- Have been referenced in this procedure.
- Should be considered in understanding and applying the instructions provided in this procedure.

Document Name	Document No	Document Location
HSSE Risk Management Procedure	PRO-3.1-0001-0-01	Controlled Document Register
Group Guide- Managing Industrial Hygiene	<u>GG 3.4-0011</u>	OMS Library
MS&L Management of Change Procedure	PRO-4.2-0001-0-01	Controlled Document Register
Control of Work Procedure	PRO-4.5-0001-0-01	Controlled Document Register
MS&L Self Verification Procedure	PRO-8.2-0001-0-01	Controlled Document Register
Management of Medical Records	WIN-3.4-0004-0-02	Controlled Document Register
The storage and handling of flammable and combustible liquids)	AS 1940:2017	SAI Global website
The storage and handling of LP Gas	AS/NZS 1596:2014	SAI Global website
The storage and handling of gasses in cylinders.	AS 4332-2004 (R2016)	SAI Global website

8. External References

This procedure was prepared with reference to relevant legislation/regulations including but not limited to, relevant Acts, Regulations, Australian Standards and industry codes and practices.

Details of current legislation/regulations can be provided by the HSSE Team on request.

9. Version Summary

The table below provides a summary of version history of this procedure.

Table 4: Document Version Summary

Version	Prepared by	Description of Change	Date	MoC
1	Cynthia Gurry	Document created	10 May 10	
2	Andrew Bennett	Modify document to describe current practices	29 Dec 11	
3	Andrew Bennett	COSHHnet now used to risk assess hazardous substances. New health surveillance requirements. New training requirements.	09 Jul 12	
4	Cheryl Fehlberg	Document Archived - as per email request	25 Sep 12	
5	Cheryl Fehlberg	Document Archived incorrectly reversed	26 Sep 12	

Version	Prepared by	Description of Change	Date	MoC
6	Andrew Bennett	Added flowchart in Appendix 1. Inserted standard paragraph into	25 Oct 12	
7	Keith Harrison, Andrew Bennett	Addition of NZ specific requirements to meet S&OR Audit actions and compliance with HSNO legislation.	13 Jun 13	
8	Jess Mathers	Procedure moved to new template and document number changed to reflect OMS. Previously known as PR-PD-036.	16 Jun 14	
9	Joan Coyle	Title changed to clarify purpose, roles & responsibilities amended to reflect current organisational structure, changed reference from workplace substance register to chemical register throughout document, moved all risk phrases/hazard statements to Annexes A and B.	08 May 18	11434
10	David Venour	Combination of procedures PRO-3.1-0000-0-02 and PRO 3.4- 0000-0-01 to simplify/ reduce duplication. Title change to reflect combined procedure. Update to reflect Global Harmonised System for classification of chemicals, and changes in supporting legislation (including dangerous goods storage and handling)	18 Apr 19	11542

End of Document