REQUESTS FOR CONSULTATIVE STATUS  
(NON-GOVERNMENTAL ORGANIZATIONS (NGOs))

Request by the Soap and Detergent Association (SDA)  
(United States of America)

Note by the secretariat


2. The secretariat has received from SDA the attached letter requesting consultative status with the Sub-Committee, which the Sub-Committee may wish to consider.

3. SDA is a national association (United States of America).

4. The following international NGOs likely to represent this sector of the industry have been invited to participate in the work of the Sub-Committee:

   - International Council of Chemical Associations (ICCA) (ECOSOC consultative status, category II);

   - International Association of the Soap, Detergent and Maintenance Products Industry (ECOSOC consultative status, roster);

   - European Chemical Industry Council (CEFIC) (ECOSOC consultative status, roster).

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December 14, 2000

Francesca Bernardini, Secretariat
UN/ECOSOC Committee of Experts on the Transport of Dangerous Goods
UN/ECE
Transport Division
Room 414
Palais des Nations
1211 Geneva 10, Switzerland

Dear Ms. Bernardini,

I am writing to express the interest of The Soap and Detergent Association (SDA) in participating in deliberations of the reconfigured Committee of Experts on the Transportation of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals (CETDG/(GHS) and the Sub-committee on the Globally Harmonized System (SC/GHS) as a Non-Governmental Organization (NGO) starting in July 2001. A brief description of SDA is presented in the annex to this letter.

A Globally Harmonized System (GHS) for the classification and labeling of human health and environmental hazards of chemicals is an initiative in Programme Area B adopted under Chapter 19 of the Agenda 21, Program on Environmentally Sound Management of Toxic Chemicals at the 1992 United Nations Conference on Environment and Development (UNCED). The objective of this program is the harmonization of hazard communication for chemicals, including chemical mixtures, during use and handling in transport, workplace and consumer situations. The goal is to enhance human and environmental protection.

SDA has participated in all aspects of this program since 1996. In addition to providing industry leadership in a number of areas of discussion, SDA has made unique contributions related to the classification and labeling of consumer products. There are three general audiences for the (GHS: transport situations, workplace and consumer use. Related to consumer products, SDA has brought knowledge to the development process that no other participating NGO has been able to provide. This information has focused on the needs of consumers when it comes to hazard communication. This has resulted in development of a well-balanced GHS that meets the needs of all target audiences.

Throughout the process of developing the GHS, SDA has promoted the exchange of information and the development of consensus positions among industry organizations around the globe. SDA has used its leadership positions to bring information on this UN program to the attention of other stakeholders and to coordinate their input to the programs.

SDA seeks to extend its current leadership in providing support for development of the GHS and continue its unique contributions to the process by participating in the implementation and maintenance of the GHS as an NGO in the new Subcommittee on GHS and the Committee of Experts on the Transportation of Dangerous Goods and on the Globally Harmonized System of
Classification and Labelling of Chemicals. SDA would actively participate as an NGO in meetings and work programs of the new Committee and Subcommittee.

The following summarizes SDA's involvement to date in the activities of the various groups developing the GHS.

SDA has represents the International Organization of Employers (IOE) in the UN Coordinating Group on Harmonization of Chemical Classification Systems (CG/HCCS) under the Inter-organizational Programme for the Sound Management of Chemicals (IOMC). The IOMC CG/HCCS is responsible for coordinating the development of the various components of the GHS and establishing a program for implementing and maintaining it. SDA also plays a critical role in programs of both the Organization for Economic Cooperation and Development (OECD) and the International Labor Organization (ILO) to develop components of the GHS.

SDA represents the Business and Industry Advisory Committee (BIAC) in relevant deliberations of the OECD, which has been charged by the IOMC to develop hazard classification criteria for chemicals. These include meetings of the OECD Task Force on Harmonizing Classification and Labeling and the corresponding BIAC task force managing input to the OECD program. SDA contributes as the Vice Chair of the BIAC task force and provides technical expertise on the classification of consumer products to OECD expert groups supporting the effort.

SDA participates in meetings of the ILO Hazard Communication Working Group since its inception. This Working Group is developing, the hazard communication system for the GHS. SDA has also participated in an IOE working group providing employer and manufacturer support to the development of the GHS.

SDA also chairs the US Coordinating Committee on International Harmonization, which is a coalition of US industry associations providing supporting information to the international negotiations on the GHS via IOE and BIAC.

For your information, SDA submitted an application earlier this year for NGO consultative status with the Economic and Social Council (ECOSOC) of the United Nations to the Non-Governmental Organizations Section of the UN Department of Economic and Social Affairs for the purpose of participating in the GHS and other chemical management programs of ECOSOC.

We thank you in advance for your attention to our request. Please let me know if you need additional information or have any questions.

Sincerely,
Richard Sedlak
Vice President, Technical & International Affairs
ANNEX

The Soap and Detergent Association

The Soap and Detergent Association (SDA) is a US national organization with approximately 120 organization members. Membership in SDA is open to all organizations that have their principal place of business either in the United States or in the contiguous countries of Canada and Mexico and that manufacture cleaning products for use in household, institutional, commercial and industrial settings, as well as manufacturers of the ingredients and finished packaging for these products.

SDA serves both its member companies and the public by developing and sharing scientifically sound information about the industry's products with key stakeholders, such as the technical community, government bodies, child care and health professionals, educators, media and consumers. This includes information related to the human and environmental safety of cleaning products and their ingredients; the safe and effective use and disposal of cleaning products and their packaging; and the contributions of cleaning products to personal and public health. As part of fulfilling this mission, SDA develops and coordinates the US cleaning products industry's support for UN initiatives, currently focusing on initiatives to harmonize criteria and standards for classification and labeling of chemicals, compilation and interpretation of human and environmental safety data for high production chemicals, and chemical risk assessment. SDA has been a leader in extending its knowledge on cleaning and consumer products to these UN initiatives. SDA is also among the leaders in developing and coordinating global industry responses on international human and environmental safety and chemical management initiatives by working to build consensus among industries around the world.

The work of the organization is carried out in many ways: conduct of both in-house and external in-depth research relevant to understanding the human and environmental hazard and exposure, and resulting risk for cleaning product chemicals; communication of related information to the scientific community, government bodies, educators, communicators and consumers through education programs, publications, presentations at workshops and conferences, and the SDA web-site.