

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Sub-Committee of Experts on the Globally Harmonized
System of Classification and Labelling of Chemicals
Transport of Dangerous Goods

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BUILDING BLOCK APPROACH: GUIDANCE AND IMPLEMENTATION

Comments on ST/S/AC.10/C.4/2005/6

Transmitted by the expert from South Africa

It is recognized that different target audiences/sectors require different communication of hazards depending on their needs.

The hazard classes and categories used in the transport sector are established in the UN *Recommendations on the Transport of Dangerous Goods*.

Our concern is that the hazard classes and categories applicable to the workplace and consumer sectors are at the discretion of the competent authority. As pointed out in the proposed new clause 1.1.3.1.5.7 on page 4 of the Canadian proposal, the result of this is that an exporter to different countries needs to comply with each importing country's GHS implementation.

This approach is unacceptable as it does not only hamper international trade but is in direct conflict with the principles of a globally harmonized system for chemicals.

It is proposed that the Subcommittee give urgent attention on mechanisms to have a harmonized approach in place over all sectors that do not rely on the discretion of a competent authority.
