

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

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IMPLEMENTATION OF THE GHS (Other Implementation Issues)

Transmitted by the expert from Australia

Background

1. The implementation of the GHS is now the focus of many countries. While for many countries 2008 was identified as the date by which the GHS would be implemented, it is understood that this target date will not be met by all. While good progress towards the adoption of the GHS has been made in some chemical sectors, in others, further consultation and the need to address specific issues have delayed the adoption of the GHS.
2. To ensure that the goals and objectives of the GHS are met and that progress towards international adoption continues, it is vital that implementation of the GHS is encouraged and that any impediments to harmonised adoption are addressed. The input of government agencies, including the authorities responsible for oversight of chemical sectors impacted by the GHS, may be critical in that process.
3. To obtain the maximum benefits of GHS implementation, consistent adoption of GHS between countries should be encouraged to reduce the changes necessary to classification and labelling. The ongoing exchange of information, sharing of ideas and promulgation of solutions to implementation issues is encouraged.

Issues

4. As countries move to implement the GHS, attention is now being focused on the practical issues of implementation across the various chemical sectors.
5. Implementation issues may include:
 - Different implementation timetables between countries leading to potential need to managing transition periods Consistency in label changes would deliver maximum efficiencies globally, although competent authorities will need to make decisions on transition periods to meet their own regulatory requirements. Different versions of

labels are in the marketplace simultaneously now and transition into GHS may introduce in the interim, “new” label elements (e.g. new pictograms in the GHS). Consideration of managing potential confusion of consumers and workers may be needed.

- Possible implementation of GHS classification only but not labelling. Noting that this is a decision for the competent authority(ies), and that any “partial implementation” of the GHS will need to be considered against any potential loss of benefit of the GHS system *in toto*.
- GHS classification issues: includes the need to avoid duplication of effort, promote consistency and the need to consider the possible concept of sharing classification experiences. (For example, currently Australian workplace classification is often automatically adopted from the EU).
- Training, outreach and awareness raising. Competent authorities in different sectors and different countries will have different approaches to training. As UNITAR has well developed approaches to training in developing countries, it may be appropriate to recommend material be extended to developed countries.
- Trade facilitation arrangements during transition periods. As countries adopt different implementation schedules, some arrangement to minimise trade disruption may be necessary.

6. At its 12 Session in December 2006, the Sub-Committee of Experts on the Globally Harmonised System for the Classification and Labelling of Chemicals agreed to give some priority in the biennial work plan to addressing the implementation of the GHS. Australia is very supportive of this initiative and suggests that:

- (a) in the overall work plan, a degree of urgency is placed on addressing implementation issues in order that the GHS can be advanced as quickly as possible;
 - (b) government agencies with responsibility for managing chemical sectors impacted by the GHS be involved in identifying and resolving implementation issues;
 - (c) in addressing implementation issues, the need for a consistent and harmonised approach be recognised in order to maximise the health, safety and environmental benefits offered by the system balanced as well as the removal of unnecessary barriers to trade.
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