

## 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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Item 4(c) of the provisional agenda

### IMPLEMENTATION OF THE GHS

#### Miscellaneous

#### Challenges for the implementation of the GHS

#### Transmitted by the Expert from South Africa

#### **1. Introduction**

Since all countries committed to the global implementation of the GHS by 2008, both through the ECOSOC and the Johannesburg Plan of Implementation, South Africa has started to identify the activities that will be required to implement the system. As a result of initial investigations a number of challenges have been identified.

#### **2. Implementation challenges**

Activities on GHS in the Subcommittee are currently confined to further technical elaboration of the system and no detailed discussions on the implementation challenges are being undertaken.

While individual countries are developing national strategies to ensure national implementation by 2008, there is no clear global implementation strategy. It is recognized that primary responsibility for implementation of the GHS lies with national jurisdictions. However, facilitation of international trade demands that there is an agreed global approach to ensure that implementation at national level does not inadvertently constitute a technical barrier to trade.

Issues that need to be addressed include the following:

- a) It is common practice at national level to allow a transitional period for legislative changes that require significant changes to existing legislation. It is therefore logical that at an international level a transitional period should apply for the implementation of the GHS;
- b) Reviews undertaken in some jurisdictions have revealed that a significant number of substances will require reclassification to comply with the GHS classification system. This is not a trivial task, particularly for companies that have a large variety of products. The extent of the task needs to be taken into account at a global;
- c) The structure and format of the Purple Book present significant challenges as it is not in a format suitable for direct adoption as a national standard or for direct incorporation in national legislation. Therefore, the incorporation of the requirements in national legislation requires a significant amount of work, which results in a situation where it is impossible for

national requirements to remain aligned with international requirements when the system is revised every two years as is currently the intention after 2008;

- d) Countries that have already undertaken a gap analysis against the first version of the GHS now have to redo it to ensure compliance with the first revised edition by 2008.

### **3. Proposals**

It is proposed that consideration be given to the following approaches, with a view to making recommendations to ECOSOC.

#### **Proposal 1 – Transitional Period**

To adopt 1 January 2008 as the start of a transitional period, which should extend for a period of 5 or 10 years, during which GHS requirements will be recognized alongside existing systems.

#### **Proposal 2 – Sharing information**

That the OECD High Production Volume (HPV) Global Portal be promoted as a mechanism that can facilitate sharing of information.

#### **Proposal 3 – Structure of the GHS**

The format of the GHS reviewed with a view of separating requirements, discretionary elements and guidance into three different parts.

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