

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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PROGRAMME OF WORK FOR THE BIENNIUM 2005-2006

Comments on ST/SG/AC.10/C.4/2004/18 (CTIF)

Transmitted by the European Chemical Industry Council (CEFIC)

Background

In 2002 the ECOSOC Sub-Committee of Experts on the GHS agreed on the GHS symbols.

In 2004, CTIF proposed in paper ST/SG/AC.10/C.4/2004/18 to review the agreed GHS symbols (pictograms, placards) in order to 'better meet the needs of the target audiences' and to install a working group that should work on this review. In Annex 1 of their paper, CTIF laid out their view of how the GHS symbols could be further developed/amended.

Comments

The World Summit in Rio de Janeiro in 1992 stated in paragraph 19.27 of Agenda 21, Programme Area B the objectives of the GHS, and this is repeated in 1.1.2.3 of the GHS:

"A globally harmonized hazard classification and compatible labelling system, including material safety data sheets and **easily understandable symbols**, should be available, if feasible, by the year 2000."

The GHS pictograms which were agreed, comprise of the symbol plus other graphic elements such as a border, background pattern, shape or colour, and were developed to achieve the overall goal of the Rio Conference to strive for easily understandable symbols.

CTIF participated in the ILO working group, which developed the GHS symbols. The working group took into account and respected the differing needs of the addressed target audiences - consumers, workers and transport workers as well as emergency responders.

Finally, the ILO working group agreed on an approach concerning the GHS symbols, balancing the wishes of the different representatives versus comprehensibility.

CEFIC considers that the CTIF proposal will lead to a proliferation of variations of the existing pictograms that will add complexity to the system. This may be beneficial to specifically trained experts, such as CTIF members, but it will degrade the comprehensibility of the system for the vast majority of the users of the GHS, and consumers in particular. This is inconsistent with the goal to have **easily understandable symbols**, and is also inconsistent with the CTIF aim to 'better meet the needs of the target audiences'.