

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

Reports from Governments or organizations

Transmitted by the International Paint and Printing Ink Council, Inc. (IPPIC)¹

IPPIC would like to communicate to the Sub-Committee a formal position and plan of action its delegates took at its recent (March 3, 2005) meeting in Sao Paulo, Brazil on behalf of the global paint and printing ink industries:

IPPIC supports the goal of international harmonization of paint and printing ink product labelling through the Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

This position was taken recognizing that harmonization of labels, SDS and other hazard communication requirements will facilitate international commerce in paints, printing ink and allied chemical products. Conceivably, globally uniform safety data sheets and labels would make it easier for multi-national companies to ensure that hazard and risk advice is correctly communicated to handlers and end-users anywhere in the world, reduce costs for companies serving multinational markets, and lower the barriers of entry for national companies seeking to move products abroad.

IPPIC has had frequent discussions about the GHS over the past three years, and has established a formal relationship with the UNECE-TDG Sub-Committee of Experts on the GHS, stemming from its consultative status with the UN's Economic and Social Council (ECOSOC).

IPPIC is convinced that successful implementation of the GHS will require continued input from industry. Far from being a simple system, the GHS will require careful analysis, detailed technical interpretations, and thoughtful organization and presentation to industry to foster support and cooperation on implementation efforts. Advancing industry support, IPPIC believes will prepare the paint and printing ink industries for the inevitable move to the GHS, and provide opportunities for effective global advocacy on any lingering (interpretive) implementation issues.

¹ The International Paint and Printing Ink Council, Inc. (IPPIC) is an international non-profit organization comprised of representatives from paint and printing ink manufacturers associations from the EU, US, Canada, Mexico, Brazil, Japan, Australia, India and China. IPPIC has official NGO status before the United Nations Economic and Social Council and is working cooperatively with a number of UN agencies and affiliated organizations to support program development.

To facilitate the harmonization efforts and collect industry input, the IPPIC Secretariat has formed the IPPIC Globally Harmonized System (GHS) Committee. This committee is comprised of industry experts in product labelling and SDS preparation recruited from each IPPIC member association. The members of the IPPIC GHS Committee have recently met (Brussels, 7-8 July, 2005) to advance a series of key work products aimed at bolstering paint and printing ink industry support for the implementation of the GHS:

1. A **comparison of the GHS requirements** with current national or regional legislative/regulatory requirements for paint and printing ink labelling operating around the world.
2. A complete **assessment of industry actions necessary to prepare for GHS implementation**, to properly characterize requirements for certain categories of coatings and ink products, and to identify which aspects of the GHS need to be consistently interpreted (for mixtures) to facilitate harmonization.
3. A **comprehensive guidance document** for the paint and printing ink industry which advances understanding of the GHS requirements and fosters cooperative support for uniform global implementations

IPPIC appreciates the efforts made by the Sub-Committee to provide detailed information on its efforts to clarify and advance the GHS. To further assist the Sub-Committee IPPIC plans to share its work product directly, and would welcome the opportunity to work directly with individual countries in support of their own implementation efforts.

Should any questions arise regarding paint and printing ink industry and/or IPPIC efforts please contact:

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