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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
Transport of Dangerous Goods

(Twenty-third session, 30 June-4 July 2003,
agenda item 7)

HARMONIZATION WITH THE GLOBALLY HARMONIZED SYSTEM OF
CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Issues to be addressed and organization of the work

Transmitted by the expert from the Netherlands

INTRODUCTION

The World Summit on Sustainable Development (WSSD) at its 2002 session in Johannesburg encouraged countries to implement the GHS as soon as possible with a view of having the system fully operational by 2008. Organizations such as the Sub-Committee of Experts on the Transport of Dangerous Goods were invited to amend their international instruments so as to give effect to the GHS through such instruments. This was the reason to include the implementation of the GHS into the Recommendations on the Transport of Dangerous Goods in the work programme of the Sub-Committee. It has however not yet been discussed how the work of implementing the GHS will be organized. The purpose of this submission is to start a discussion on the issues that need to be addressed and the organization of the necessary work.

ISSUES TO BE ADDRESSED

In view of the Netherlands at least the following issues need to be addressed in the following order :

1. Which parts of the GHS are relevant for transport and should therefore be incorporated in the Recommendations? For example:
 - Criteria for acute effects (single exposure)
 - Criteria for Chronic effects
 - Safety Data Sheet
 - Criteria for mixtures

2. How are the relevant parts to be incorporated? For example:

- Detailed analyses of existing TDG classes in comparison with GHS: insight in differences between GHS and TDG + adjustment TDG
- Insertion of new criteria or new (sub) classes in TDG
- Inclusion of criteria for mixtures: general part + class specific parts
- The criteria for environmentally hazardous substances: for which substances should the criteria be applicable and which label should be required

3. What are the necessary consequential amendments? For example:

- For new TDG (sub) classes: development of transport requirements, corresponding UN numbers (NOS positions), adjustment of precedence of hazard
- Adjustment of the required Data Sheet

ORGANIZATION OF THE WORK

Target completion date

The deadline for the implementation of the GHS is 2008. What does this mean for the time available to the Sub-Committee to implement the GHS? Does the Sub-Committee need one or two biennia to complete the task?

If the Sub-Committee completes the task in one biennium (2003-2004) the mode specific regulations (such as IMDG, ICAO-TI, ADR, RID, ADNR) can enter into force on 1-1-2007.

If the Sub-Committee completes the task in two biennia (2003-2006) the mode specific regulations can enter into force on 1-1-2009.

In order to agree upon a general timetable for the work-items under the process of implementing the GHS into the transport regulations, a decision on the target completion date by the Sub-Committee is required.

How will Sub-Committee deal with these issues?

The next question that needs to be answered is how the Sub-Committee wants to structure the work-items. Looking at the issues to be dealt with as identified above, it is obvious that some principle decisions need to be taken by the Sub-Committee based on discussions on proposals by members of the Sub-Committee. In addition, it could be discussed, whether the secretariat could play a role in preparing the relevant documents, on items such as the analyses of the differences between GHS and TDG. Furthermore, delegation of certain tasks to working-groups could enable the Sub-Committee to handle the workload of the whole implementation process.
