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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 Globally  
Harmonized System of Classification  
and Labelling of Chemicals

Twelfth session  
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Item 3(c) of the provisional agenda

**HAZARD COMMUNICATION ISSUES**

Building block approach: guidance on its implementation

Transmitted by the expert from France

Following the discussions that have taken place at the eleventh session of the Sub-Committee, based on document UN/SCEGHS/11/INF.20, the expert from France has circulated a refined version of the document among experts from different countries. The comments received were in line with the views of the expert from France on the Building Block Approach and have been taken into account in the present document.

The Sub-Committee is requested to express its opinion on the interpretation presented hereafter, and to decide on whether these elements should be inserted in the GHS document and/or be considered for the elaboration of guidelines in the context of the implementation of the GHS.

STATUS OF DIFFERENT ELEMENTS CONTAINED IN THE GHS  
IN RELATION TO THE BUILDING BLOCK APPROACH

- (a) Hazard classes are building block : competent authorities have the possibility not to apply some hazard classes as described in the GHS.
- (b) Within a hazard class, each category is a building block: for a given hazard class, competent authorities have the possibility not to apply all categories. Nevertheless, in order to preserve consistency, some restrictions to this principle must be set, as follows:
- (i) The classification criteria such as the cut-off values or concentration limits for adopted hazard categories should not be altered. However, adjacent sub-categories (e.g. carcinogenicity Categories 1A and 1B) may be merged into one category. Nevertheless, adjacent hazard categories should not be merged, if it results in renumbering the remaining hazard categories. Furthermore, where sub-categories are merged, the names or numbers of the original GHS sub-categories should be retained (e.g. Carcinogenicity Category 1 or 1A/B) to facilitate hazard communication;
  - (ii) Where a competent authority adopts a hazard category, it should also adopt all the categories for higher hazard levels in that class. As a consequence, when a competent authority adopts a hazard class, it will always adopt at least the highest hazard category (Category 1), and, where more than one hazard category is adopted, these hazard categories will form an unbroken sequence.
- (c) Labelling elements may not be detached from the chosen hazard classes and categories and should not be considered as a building block as such.

However, the GHS has established specific rules concerning the design of labels used in transport; thus, where labels are required by the transport regulations, they shall conform to the specific rules for labelling during transport, as provided in the GHS text.

Furthermore, considering that the scope of GHS does not cover all the cases where information on carried goods is required, including the problems related to marking/labelling of different transport materials (containers, tanks, outer packagings, overpacks...), specific marking may be used in this sector.

- (d) The use of an SDS is a building block, but not the content of an SDS: competent authorities may choose to use an SDS or not, but when used, its contents should at least match those described in the GHS to comply with harmonization requirements regarding the communication of information on dangerous substances and mixtures. However, since, according to paragraph 1.5.1, the SDS has been specifically designed to meet the needs of the workplace sector, the use of an SDS in this sector shall not be optional and therefore it shall not be considered as a building block in this context.

If it is the decision of a competent authority to leave a building block aside when implementing GHS, this competent authority has the right either not to address this topic at all, or to deal with it in its own way.

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