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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

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BUILDING BLOCK APPROACH GUIDANCE AND IMPLEMENTATION

Comments on INF.12

Results of the BBA correspondance group

Transmitted by the expert from France

France does not support the conclusion of INF.12 not to continue the work on the BBA approach. The issue has shown a certain complexity but clarification on this subject is worth the effort.

The interpretation of the BBA being a key-issue for the implementation of GHS, France considers necessary to insert in the text of the GHS a clear definition for Building Blocks. In parallel, the BBA requires guidance for its application. For example, this guidance could be another annex in the GHS. France would like that the discussion on the BBA, first developed in the BBA group, be continued after the first progress report, which will be presented at the UNSEGHS meeting in July.

The interpretation of the BBA should enlighten countries and sectors about the implementation of the GHS harmonised criteria, and this interpretation should not take into account the other non-harmonised elements. Furthermore, it is important for the future users of GHS and the related regulations to be aware of what differences they still may encounter between states and sectors that declare having implemented the GHS.

After further national consultation we were able to refine our view and understanding of how BBA should be applied and provide comments that replace the earlier statements that have been sent to the BBA working group.

The following comments are provided not only as a coordinated French view but also as a comprehensive approach on how different parts of the GHS may be considered in the frame of the BBA, to help future work on the subject.

STATUS OF DIFFERENT ELEMENTS CONTAINED IN THE GHS IN RELATION TO THE BBA

- The hazard classes are BBs : each sector has the possibility not to apply some hazard classes as described in the GHS.
- Within a hazard class, each category is a BB: for a hazard class, each sector/state has the possibility not to apply all categories. Nevertheless, in order to preserve consistency, some restrictions to this possibility must be set, as follow:
 - o Cut-offs or concentration limits should not be altered, but several adjacent hazard categories may be merged in one global category only if they are subject to the same regulatory prescriptions (including GHS labelling prescriptions) in a specific sector/state. In this case the upper and lower limits of the merged category should not be altered.
 - o If a category corresponding to a certain danger level applies in a sector/state all categories corresponding to a higher danger level shall apply
- Labelling elements may not be detached from the chosen hazard classes and categories and should not be considered as a BB as such.

However, the GHS has set 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 set in the GHS text.

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

The use of an SDS is a BB, but not the content of an SDS: A sector may choose to use an SDS or not, but when used, its content should at least match that described in the GHS, in order to satisfy the need for harmonised information communication on dangerous substances and mixtures. However taking care of the fact that according to 1.5.1. the SDS has been specifically designed to meet the need of the working places the use of an SDS in this sector shall not be optional and therefore not be considered as a BB in this context.
