

## 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

#### Paint and printing ink industry concerns

Transmitted by the International Paint and Printing Ink Council (IPPIC)

#### **Introduction**

Paints, printing inks and artists' colours bring colour to life, protect the many valuable goods on which they are applied, and are the vectors of information exchange and a means for personal expression and culture. They have been in existence since the origin of mankind, and leave a permanent trace in history.

The paint, printing ink and artists' colours industries manufacture and sell products both to consumers and end user industries. Millions of different mixture formulations are offered to meet diverse product specifications and to support customers pursuing a wide variety of applications.

A large part of the paint and printing ink production is destined to cross borders to serve a diverse customer base, and for many companies the trade is worldwide. Facilitating international trade is a key issue for the paint and printing ink industry, and one of the underlying reasons for a continued interest in establishing a strong, fully harmonised global system for classification and labelling of chemicals as well as for international transport regulations covering all modes.

To this end, IPPIC is seriously committed to ensuring a ***fully harmonized, uniformly implemented*** version of the UN's Globally Harmonized System (GHS). Achieving this goal of global uniformity provides chemical and formulated product manufacturers with a unique opportunity to have a single classification, labelling and safety data sheet (SDS) for selling products anywhere in the world. The establishment of a truly harmonized system provides advantages across all industry types, and for all companies regardless of size. Most important, however, is uniform and harmonized labels and SDS ensure the highest degree of safety and environmental protection.

But the effort to establish a truly uniform GHS has currently developed some drawbacks, namely:

- the *Building Block Approach* (par. 1.1.3.1.5) which allows competent authorities to determine which of the *building blocks* will be implemented in their system;

- the *classification systems for mixtures* (par. 1.3.3) leads to different results when applying the *bridging principle* or the *additivity formula*, particularly when using toxicological data from different sources.

### **The Building Block Approach**

As it is currently written, the Building Block Approach (which allows national governments complete flexibility in implementing all or parts of the GHS) will lead to different labelling requirements for consumers and workers, different Safety Data Sheet (SDS) content for workers, and consequently different levels of protection for these two important target audiences.

It is conceivable, and in fact reasonable in some cases to not include all the building block aspects of the GHS, particularly when some hazard categories are irrelevant for a given target audience with unique exposures (e.g. the Transport of Dangerous Goods).

But, when considering the broader needs of consumers, workers and environmental protection, hazard communication information on labels and SDS should definitely be the same around the world. IPPIC member association commitments to Product Stewardship under Coatings Care<sup>®</sup> and Responsible Care<sup>®</sup> are not supportive of different levels of hazard communication information as well.

### **The Classification Systems for Mixtures**

The paint, printing ink and artists' colours industries manufacture and sell millions of different mixture formulations to its diverse customer base. As it is impossible to have each of these formulations individually and completely tested for all GHS hazard classifications, IPPIC believes that the classification of mixtures under the GHS with respect to health and environment hazards (and subsequently communicated through labels and SDS) must flow from practical and well-defined procedures in the GHS for the *bridging principle* or the *additivity formula*.

Ill-defined efforts to engage in "self-classification" or for the use of "expert judgment" have the potential to lead to inconsistent mixtures classifications that will result in confusing and improper labelling. Furthermore, similar inconsistencies may develop when the *additivity formula* is applied using toxicological data for individual substances in the mixture that were established using different testing methods.

IPPIC believes it is therefore imperative to have a worldwide substances classification database.

### **Conclusion**

IPPIC supports for the basic principles harmonized classification and hazard communication (labelling and safety data sheets) under the GHS, and specifically:

- Calls on the competent authorities in all parts of the world to ensure a consistent implementation of the same set of Building Blocks and accept in commerce labels and SDS on products that are based on the full compliment of requirements in the GHS;
  - Challenges the UN-Sub Committee of Experts on the GHS to undertake actions during the biennium 2007-2008 for the setting of a worldwide database containing the classification of substances;
  - Welcomes the continuous development and improvement of the GHS with the objective of true global harmonization, and plans to increase its involvement with the UN Sub-Committee of Experts on the GHS.
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