

Statement regarding the implementation of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS)) (*)

INTRODUCTION.

GHS is a classification and labelling system of chemical products developed by the United Nations as a non-binding recommendation, which is still undergoing adjustments and updates every two years ("purple book").

This classification and labelling system is **based on the** intrinsic physical **hazard** for the health or the environment of a certain substance and/or mixture it contains and **not on the risk related to the use** (Risk = Exposure x Hazard) of the product as a whole.

GHS recommends the use of a Safety Data Sheet (SDS) as a means to communicate the hazard to the workers who handle hazardous substances or mixtures. Besides, it is also recommended to add to the usual labelling the following elements: caution pictograms (see images of some of them), warning word, danger indication and safety advises.



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Objective of this statement:

Take a position in relation to the scope of the GHS implementation in Latin America, both within the work and the transportation environment and on the labels of household cleaning products to ensure safety standards in the handle of such products.

General Principles

We support:

- The safeguard of human health and the environment while reducing the regulatory burden on the industry and authorities.
- A scientific, practical, coherent and transparent application of the GHS labelling which helps to move forward towards the safe use of chemicals in the labour and transportation environment.

Harmonized communication systems for hazardous products generate the following benefits:

- Improvement of human health and environment protection within occupational environment, until reaching the final consumer.
- Reduction of the need to test chemicals as they provide a recognized aligned framework for those countries without classification and labelling system and promote the mutual recognition of data, valid for classification.
- Reduction of the barriers to international trade.

Progressing Globally

We believe the benefits for any country adopting the GHS will only become concrete with a high level of coordination and harmonization of the sectors involved in the different countries and regions. There is benefit pour country implementing GHS to seek coordinated approach

We support the global implementation of GHS for occupational process, and in particular for LatAm Countires



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Objectives of the Implementation

As the implementation makes progress, we also pursue the following objectives, which are in line with the above principles:

- The consumers and users of our products and materials will have a safer handling of such products through communication of best practice through either use recommendations or labelling system based on the risk. This will ensure a suitable understanding and use of said products.
- The labelling requirements must recognize the needs of the final user who the label is addressed to, providing no more and no less than the necessary information for a safe use.

Concerning the process of changes in the development of the existing communication frameworks, we support the following:

- The scope of implement GHS defined by the authorities, need to be into account the interested of industry associations which must be involved for the definition of the implementation processes, and before undertaking the start up or taking timetable decisions.
- No doubt, the changes in all the labels of shipment and products mean a great burden of resources for the industry as well as for the authorities.
- The impacts to the business should be considered before undertaking its implementation, so as to ensure a suitable understanding of the costs this will mean for the industry and for consumers. In this way, we will be convinced that these costs are justified to improve the safety of the products.

Basic Principles for the Classification and Labelling described in the GHS document

We support the following basic principles when implementing the GHS:

- ***Adoption of Annex 5 – Option of consumer product labelling based on likelihood of injury***

GHS document says “competent authorities can authorize the labelling systems for the consumer providing the information based on the possibility of causing damage (labelling based on risk).”



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- ***Focus on providing the information which meets the needs of a suitable information in order to ensure the users' understanding.***

GHS takes into account the needs of information of the different audiences it is addressed to. It is well known that the overly detailed, difficult to read labels containing redundant warnings, unknown to the consumers, reduce the possibility for them to understand such labels (ILO/HC6/00.13 21.09.2000).

- ***Application of the “Approach of the Building Block”***

Taking into account that the different audiences have distinct safety information requirements, GHS is flexible enough to meet the specific needs of the user through the Approach of the building block. We recommend to implement the threshold (cut-off) level stated in the implementation of GHS in the EU (EU-CLP), as well as categories (and sub categories) in this economic region.

- ***Maximum use of the existing data***

One of the core objectives of the GHS is “to reduce the need of test and evaluation of chemical products and mixtures”, no additional test is necessary for the chemical substances or mixtures as it is “based on the data available at present”, when data are available from robust scientific approaches, (e.g.: Bridge data about the experimentation on human beings, *in vitro*, SAR/QSAR, *in silico* approaches), such information may be used for the classification. This means that valid data, not limited to OECD technical guidance can be used, as long as there are valid for the endpoint assessed.

- ***Precedence of human experience over other information***

GHS document says “Generally the data about good quality and reliability for human beings will have precedence over other data. This is a key concept, especially when determining the suitable labelling for consumption products. However, GHS mention human studies cannot be performed, for classification and labelling purpose. This means that such studies should be discouraged. Epidemiological data, existing information, as well as any human exposure data can be used as weight of evidence.

- ***Use of the Approach of the Burden of the Evidence in the Decision of the Classification***

It is important to consider the burden and credibility of the evidence taking into account the reliability and coherence of the data of the whole available information. GHS document says, “For some types of risk, the classification results directly when data meet the criteria. For others, the classification of a substance or mixture is made on the basis of the total burden of the evidence. This means that all the available information about the determination of the toxicity is considered as a whole, including the results of the valid tests *in vitro*, the relevant data on animals and the experience on human beings such as epidemiologic and clinic studies and reports of well documented cases and observations.”



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- ***Protection of the Business Confidential Information***

GHS document says, "Competent authority must protect the confidentiality of the information in line with the applicable law and the practices in force".

Conclusion and Positioning of ALIADA

About the Scope of GHS in the Work Places and Transports:

As industry, we consider that the implementation of a communication on the labelling based on the hazard (GHS) addressed to the workers of the industrial, labour and transport sector is suitable in view of that such workers have a higher level of exposure to the hazard due to the frequent and direct handling of large amounts of chemicals.

In this sense, while implementing GHS in the labour and transport environment implies important changes, there is no doubt it will mean a significant progress in the safety of all the involved workers.

The implementation of GHS in the labour and transport environment must ensure:

1. Training and awareness of the GHS to ensure that workers have a correct interpretation of the pictograms and Safety Data Sheets.
2. Suitable equipment and clothes to guarantee the protection of the workers.
3. Implementation of operational controls to minimize the exposure of the workers to dangerous chemical substances.

About the Scope of the GHS for Household cleaning Consumer Products :

GHS labelling for household cleaning consumer products requires that the product has an unnecessary and incomprehensible information which will not turn into an improvement in the ways of use and storage for consumers.

Below we outline some implications of the implementation of the GHS in the labelling of household cleaning consumer products:

1. Confusion for consumers as they are not able to distinguish between the really hazardous products and those which are not, increasing the risk of exposure due to misuse.
2. Unsuitable label for consumers to read due to the addition of specific unnecessary safety phrases.
3. Possible confusion at the toxicological attention centres regarding decision / action taking due to the labelling which is not related to the real hazard of the domestic cleaning product involved.
4. We recommend to strengthen the collaboration with local and regional poison control centre, by agreeing to share relevant information (e.g. SDS), facilitating an adequate management and assessment (based on risk) in case on unintended use.



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FINAL CONCLUSION:

The Household Cleaning Products Sector supports the implementation of GHS for occupational safety. Such implementation, in other regions showed an improvement for the benefit of workers. In addition, this will enhance the communication within the value chain with harmonized approach.

On the other hand, we consider that for household cleaning consumer products, a labelling based on risks is the most suitable. A labelling based on the hazards, as GHS, does not distinguish between highly hazardous products and these which can be safely used.

ALIADA and his members are ready to work together with the regulatory bodies in charge of GHS implementation Latin America countries for the purpose of creating the conditions to ensure we continue delivering the suitable safety standards to the consumers according to their needs.

Activities Carried Out by ALIADA

- **April 10/ 2012, Brasilia (Brazil):** Participation of ALIADA in the Seminar organized by ANVISA (Agencia Nacional de Vigilancia Sanitaria) regarding the application of GHS for household cleaning products. The status of the implementation of the GHS was presented in Latin America countries and ALIADA position (further information visit <http://www.aliada.org/aliada/home/39-participacion-aliada-en-seminario-brasilia-sobre-aplicacion-del-ghs-a-productos-de-limpieza-y-aseo-domestico>).
- **July 10 and 11, 2012, Buenos Aires (Argentina):** Participation of ALIADA in the discussion panel about GHS, status and world perspectives of its application (for further information visit <http://www.aliada.org/aliada/home/50-segundas-jornadas-de-detergencia-tensioactivos-y-afines-argentina-julio-2012>)
- **August 31, 2017, Santiago (Chile):** Participation of ALIADA in CITUC (Chilean Poison center) event, to present Global implementation of GHS



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References: (*) GHS

https://www.unece.org/fileadmin/DAM/trans/danger/publi/ghs/ghs_rev06/Spanish/ST-SG-AC10-30-Rev6sp.pdf

[GHS official text \(Purple Book\) 6th revised edition \(2015\)](#)

[GHS presentations on UN site](#)

[INCPA position on GHS implementation](#)

[UN site monitoring status of GHS implementation](#)



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