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*Canadian Consumer Specialty
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*Consumer Specialty Products
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*Japan Soap and Detergent
Association (JSDA)*

Global Implementation of the Globally Harmonized System (GHS) of Classification and Labelling of Chemicals

Position Statement

General Principles

We support:

- Safeguarding human health and the environment while minimizing regulatory burden on industry and government.
- A scientific, risk-based, practical, consistent, and transparent application of GHS that helps advance the safe use of our products.
- The benefits of harmonized communication systems will include the following:
 - Enhance protection of human health and the environment
 - Reduce the need for testing of chemicals
 - Provide a recognized framework for those countries without an existing labelling systems; and
 - Reduce barriers to international trade.

Moving forward Globally

We believe that the benefits to any country implementing GHS will be realised only with a high level of co-ordination and harmonization within the affected sectors of the countries and regions implementing the GHS. No jurisdiction can meaningfully implement the GHS in isolation.

We support a process that will result in a coordinated implementation of the GHS within countries and regions in consultation with all affected sectors.

Implementation Objectives

As implementation moves forward, we support the following objectives, which are consistent with the principles above:

- Consumers and users of our products and materials are served best through a scientific risk-based approach to labelling that ensures comprehensibility and relevance.
- Labelling requirements must recognize the unique needs of the intended end-user sector, providing neither less nor more information than is appropriate.

Regarding the process for developing changes to existing communication frameworks, we support the following:

- Options for implementing the GHS need to be determined and industry stakeholders need to be engaged in the implementation process prior to committing to implementation or timing decisions.
- There is no doubt that changes to all product and shipping labels will burden the resources of both industry and government. We believe that it is essential that the transition period for changes be of sufficient length to minimize the need to make these changes outside of normal business intervals and that a step-wise transition period be implemented so that downstream users of substances and industrial mixtures can utilize the hazard classification decisions and information developed by their upstream chemical suppliers.
- The impacts on business should be considered prior to proposals being implemented to give an understanding of the costs to industry and, ultimately, consumers, and to ensure that costs are justified.

Basic principles for Classification and Labelling Described in the GHS document

We support the following basic principles when implementing the GHS:

- ***Adoption of Annex 5 – Option for risk-based labeling for consumer products***

The GHS document says “competent authorities may authorize consumer labelling systems providing information based on the likelihood of harm (risk-based labelling).” Accordingly, labelling of chronic or repeat exposure effects (e.g. carcinogenicity, reproductive toxicity, target organ toxicity) may be based on risks which have an impact on consumers’ health.

- **Focus on providing information that meets the differing information needs of users to ensure comprehensibility**

The GHS includes approaches “to take into account the information needs of different target audiences.” It is reported that cluttered, difficult to read labels, containing superfluous warnings that are outside the experience of consumers reduces the likelihood of consumers’ understanding of and adherence to warranted labels (ILO/HC6/00.13 21.09.2000).

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

Taking into account that different target audiences have differing safety information requirements, the GHS provides the flexibility to meet specific user needs through the Building Block Approach.

- **Maximum use of existing data**

One of the central objectives of the GHS is to “reduce the need for testing and evaluation of chemicals and mixtures” and it does not require additional testing of chemical substances or mixtures since it is “based on currently available data.” When data from scientifically robust, non-animal test approaches (e.g., human experience, bridging data, *in vitro* tests, SAR/QSAR, *in silico* approaches) are available, this information may be used for classification.

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

The GHS document says “Generally, data of good quality and reliability in humans will have precedence over other data.” This is a key concept, especially in determining appropriate labelling for consumer products.

- **Use of a weight-of-evidence approach in classification decision**

It is important to consider the weight and credibility of the evidence, taking into account the reliability and consistency of data of all available information. The GHS document says, “For some hazard classes, classification results directly when the data satisfy the criteria. For others, classification of a substance or a mixture is made on the basis of the total weight of evidence. This means that all available information bearing on the determination of toxicity is considered together, including the results of valid *in vitro* tests, relevant animal data, and human experience such as epidemiological and clinical studies and well-documented case reports and observations.”

- **Protection of Confidential Business Information**

The GHS document says, “The competent authority should protect the confidentiality of the information in accordance with applicable law and practice.”