GHS
The Building Block Approach - A Shopping List for Sectors and Authorities?

Vienna, March 29, 2006
Hermann Götsch,

Legal Adviser,
Chemicals Policy Unit, V/2
Ministry for the Environment
A - 1010 Vienna, Stubenbastei 5, Austria
Tel: + 43 1 51522 2338
Email: Hermann.Goetsch@lebensministerium.at
Major Features/Consequences of GHS:

- **Classification/Labelling system based on intrinsic properties:**

- **Compared to the current EU chemicals legislation:**
  Technically slightly different rules for the classification and labelling of substances and preparations (implementation more or less similar to a major change of Annex VI to directive 67/548/EEC), including:
  - a new symbol
  - new cut of values for categories of toxic substances,
  - different calculation methods for preparations
  - no list of officially classified substances, etc.
The „Building Block Approach“ in the GHS (1):

“The GHS covers all hazardous chemicals. The mode of application of the hazard communication components of the GHS (e.g. labels, safety data sheets) may vary by product category or stage of the life cycle. Target audiences for the GHS include consumers, workers, transport workers, and emergency responders.” (1.1.2.5.)
The „Building Block Approach“ in the GHS (2):

“Consistent with the building block approach, countries are free to determine which of the building blocks will be applied in different parts of their systems. However, where a system covers something that is in the GHS, and implements the GHS, that coverage should be consistent. For example, if a system covers the carcinogenicity of a chemical, it should follow the harmonized classification scheme and the harmonized label elements.” (1.1.3.1.5.1.)

“The harmonized elements of the GHS may thus be seen as a collection of building blocks from which to form a regulatory approach. While the full range is available to everyone, and should be used . . . . , the full range does not have to be adopted.” (1.1.3.1.5.3.)
The „Building Block Approach“ in the GHS (3):

What is a “building block” (still under discussion)?

Example for a decision:

“A hazard class normally forms a building block, but in certain cases the hazard categories within a hazard class can be considered to be building blocks on their own.”

What about labelling elements?

Safety data sheet chapters?
Possible areas of choice in regard to GHS transposition (legislators):

- Special labelling arrangements (1.4.10.5.5.)
- Note to Table 3.2.3: “Only some authorities will use the subcategories of Skin Category 1 (corrosive).”
- “Those authorities desiring one single category for classification of “eye irritation” may use the overall harmonized category 2 (irritant to eyes); . . “ (3.3.2.9)
- Table 3.6.1:
  “Category 2 carcinogen: \( \geq 0.1 \% \) (note 1)
  \[ \geq 1.0 \% \) (note 2)”
To take into account in implementing the GHS:

To achieve horizontal intersectional compatibility, the interlinkages should be set for every piece of sector specific legislation according to the specific needs in relation to:

- Scope
- Consequences (e.g. for installations, waste, etc.)
- Level of protection
Conclusion:

The GHS gives a certain flexibility to sectors/legislators, but as a comprehensive system, and to achieve full harmonisation, the responsible key players in all sectors/regulatory schemes should try to implement as many building blocks of the GHS as possible; there is enough flexibility already built in the GHS.