



ICCA Position on New Hazard Classes

The International Council of Chemical Associations (ICCA) remains a strong supporter and champion of the UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS). ICCA and our member companies agree that all stakeholders within the GHS Sub-committee of experts on the GHS should focus on maintaining GHS, promoting its implementation worldwide, and providing additional guidance as needs arise, while maintaining stability in the system to encourage its adoption including in developing countries that lack basic chemical management systems. In implementing GHS, countries make a commitment to adhere to the process and utilize the existing consensus-based channels for any proposed changes.

We fear that if this commitment is ignored, it would threaten the future of the UN GHS.

The European Union (EU) has proposed additional hazard classes within their Classification, Labeling and Packaging (CLP) regulation that are not currently included in the GHS Purple Book. They were brought to the UN GHS Sub-committee for possible inclusion into GHS only after the proposed CLP hazard classes were nearly finalized. We fear that this deviation will set a concerning precedent and undermine global harmonization and alignment – two key principles of GHS.

Furthermore, because of the automatic linkage between CLP and sector-specific EU product legislation, new CLP hazard classes will also have an impact on many downstream sectors using chemicals and could lead to significant supply chain disruption and trade barriers.

ICCA is willing to engage in discussions on additional hazard classes proposed by the EU to determine if there are solid scientific arguments that their adoption would increase protection of human health and the environment, and thus justify their inclusion into the UN GHS Purple Book.

Proposed criteria for additional hazard classes must be appropriate to achieve any protection objectives, must be based on sound science, and must be globally agreed upon by the UN GHS Subcommittee. It is critical that all three criteria are met to uphold the integrity of GHS, and any regulations that must follow the system.

Abiding by the GHS Rules and Procedures

Due to the need for a reasonable timeframe for thorough scientific assessments and UN GHS Subcommittee consensus, there will be a substantial period of global disharmony between the EU and other countries that have implemented GHS, if the EU continues to move forward with the proposed CLP changes. ICCA urges the EU and all countries to reinforce their commitment to the UN GHS principles and make all efforts to propose changes to the GHS classification and labelling criteria always first through the UN GHS Sub-committee process. This would not only help to prevent disharmonization, but also minimize barriers to trade and supply chain disruption that would arise from varying sets of classification criteria across the different jurisdictions