

**Progress on the implementation of GHS in APEC Economies
APEC Chemical Dialogue Virtual Working Group on GHS
August 2015**

BACKGROUND

At the 7th Chemical Dialogue (CD) meeting in Peru in 2008, the report of the Virtual Working Group on GHS titled *“Developing Clarity and Consistency in the Implementation of the Globally Harmonized System for the Classification and Labelling of Chemicals (GHS)”* was endorsed. This recognized the progress made and difficulties faced by APEC CD Members in their work to implement GHS across the region, and with our trading partners.

The Virtual Working Group (VWG) subsequently developed the GHS Implementation Reporting Template to be used for regular reporting of GHS implementation progress. Input is expected from regulatory authorities and industry in each of the APEC Economies. Information from these reports is to be used to identify issues surrounding GHS implementation for each chemical industry sector (industrial workplace, consumer, agricultural chemical and transport).

Nine APEC CD Economies provided responses in 2008/09 using the GHS Implementation Reporting Template. Information compiled from the first round of responses was provided to the Trade Ministers highlighting the continuing progress made by the APEC region in implementing GHS and the difficulties surrounding some aspects of implementation including continued revision of GHS at the UN level, lack of uniformity in implementation of GHS and the need for capacity building.

Participating Economies noted the positive outcomes by completing the template, indicating that certain details of GHS implementation that were not being considered were brought to the fore, and potential issues arising from GHS implementation that would not otherwise have been considered until post-implementation were able to be discussed. The APEC CD agreed to continue updating member economies on the GHS implementation progress through completion of the template on an annual or biennial basis.

At the 13th CD meeting in China in August 2014, the CD agreed to trial the SmartForm that was developed by Australia to allow electronic submission of the GHS implementation progress reports by the APEC Economies. The adoption of the SmartForm was an effort to increase the response rate. This did not happen. CD feedback is required to assist in improving the response rate given that Members agree that GHS implementation is a key issue and that CD is required to provide Trade Minister's with an annual implementation progress report.

In 2014, APEC Ministers Responsible for Trade instructed the Chemical Dialogue to “focus on areas of the GHS in which APEC can contribute to more consistent implementation and to report back to us in 2015 on progress”. An interim report was provided to Ministers in May, a copy of the report is attached for information as Attachment 1.

The CD also agreed in principle to reconstitute the VWG on GHS to undertake the previous recommendations arising from the GHS implementation progress reports and requested that Australian Industry develop Terms of Reference (ToR) for the re-constituted VWG for consideration by the CD at SOM1, 2015. The ToR for the VWG on GHS was endorsed out of session and the VWG reconstituted.

PROGRESS REPORT

This 2015 report is the sixth progress report of GHS implementation by APEC economies.

The following is a table of Economies that have contributed to the GHS implementation report by completing the reporting template over time.

	2008/09	2010/11	2012	2013	2014	2015
Australia	✓	✓	✓	✓	✓	✓
Chile	✓	✓	✓		✓	
Chinese Taipei	✓	✓	✓	✓		
Hong Kong, China	✓	✓	✓	✓		✓
Indonesia				✓	✓	
Japan	✓	✓	✓	✓	✓	✓
Korea	✓					
Malaysia		✓			✓	
Mexico						✓
New Zealand	✓					
Peru						✓
Philippines	✓ [#]					
Russia		✓			✓	
Singapore	✓				✓	
Thailand			✓	✓		
Vietnam						✓
USA	✓	✓ [*]	✓ [*]	✓ [*]	✓ [*]	✓ [*]

[#]Only the general information section was completed.

^{*}Only industry responses have been received.

In total, there are seven completed and one partially completed GHS reporting templates for analysis for this report. Completed reports were received from – Australia; Hong Kong, China; Japan; Mexico; Peru and Vietnam. The American Petroleum Institute (API) also provided its perspective on GHS implementation in the USA for each of the sectors. The full reports are provided as Attachments 2-8.

Although the response rate was low, several Economies (Mexico, Peru and Vietnam) that have not provided a report previously participated this year for the first time.

Industrial Workplace

As previously reported, this sector continues to be the focal point for implementation of GHS. However we note that both Mexico and Vietnam only responded in the Consumer Products section. All other economies have reported that GHS implementation for the industrial workplace is progressing ahead of implementation of other sectors. In some economies, the industrial workplace is the only sector that will implement GHS. In the case of Mexico, the response for the Consumer Products sector was that they will not be implementing GHS for consumer products.

Improved workers' protection and improved training and understanding of hazard identification were identified as the main benefits from GHS implementation. Some concerns were raised that the expected benefits from trade facilitation may not be delivered due to the differences between economies in GHS implementation e.g. adoption of different building blocks, different cut-off concentrations for classification of mixtures.

The challenges and concerns identified in this report are consistent to the challenges previously raised however, there is one major issue that has come to the fore.

The variations among Economies' implementation of GHS have been flagged as a major issue. While GHS allows certain choices by the competent authorities, different revisions of the GHS are being implemented globally. There are also concerns that differences can arise between the GHS classifications used in different Economies which potentially leads to variances in GHS labelling. Where classification databases are maintained by Economies, they can in some instances be treated as mandatory which can exacerbate the problem.

As a starting point to examine the issue of variances between the APEC Economies, the VWG compared the different building blocks and cut-off points implemented by the APEC Economies as well as reviewing the different transition times. This comparison will be tabled separately by the VWG.

It must be noted that the comparison table does not include other variances that are outside of the GHS requirements, such as differences in definitions, additional building blocks being adopted by different APEC Economies, or differences in labelling and SDS elements e.g. size and number of pictograms, hazard statements and precautionary statements required, whether red border is required on the pictogram or not, etc.

The comparison table clearly demonstrates that there is an inconsistent implementation of GHS in the APEC region, which diminishes the ability of GHS implementation to deliver one of its main benefits - trade facilitation. Due to these differences, GHS appears to not be fully delivering the anticipated synergies and benefits for industry.

Consumer

As previously reported, GHS implementation for consumer goods does not appear to be a priority for most of the APEC economies. While some economies like Vietnam has reported that they will be implementing GHS for consumer products, most other economies have identified that there are no plans to implement GHS for this sector in the next two years.

Also as previously identified, the reluctance of most APEC Economies in adopting GHS wholesale for consumer products may be explained by the difficulty in justifying the costs and benefits of implementing the system. Ideally, in the context of best practice regulation, the benefits of implementing new regulations should outweigh the costs.

It is generally understood that GHS implementation will be beneficial for two reasons. The first is improved health and safety for those coming into contact with the chemicals and the second is facilitating international trade.

While the benefits of reducing risks to human health may be realised in the Economies without existing specific consumer product rules, most Economies with established systems for managing the risks of consumer products do not anticipate any significant benefits from GHS implementation. If the existing systems are functioning well, then there should already be good health and safety outcomes for consumers. Introducing a new system such as GHS may result in initial confusion and need for consumer re-training, which adds cost to the implementation, without the benefit of improving consumer health and safety outcomes.

As identified in the Industrial Workplace sector, due to inconsistent implementation of GHS in different Economies, GHS is not fully delivering the expected benefits from trade facilitation. Similar outcomes can be expected from GHS implementation in the Consumer Products sector.

Further, for consumer products, it is unlikely that a single label would be acceptable for all APEC Economies due in part to language differences, cultural preferences and other local regulatory requirements.

Agriculture

We note that only Australia and the American Petroleum Industry have provided input in the Agricultural sector for this report.

As previously reported, the majority of Economies in previous reports have indicated that they follow the UN Food and Agricultural Organisation (FAO) rules. Some have indicated that they are also considering GHS implementation in addition to the FAO rules.

Currently WHO and FAO labelling appears to be the internationally accepted labelling for agricultural pesticides.

In the Australian report, industry identified the additional cost burden imposed on industry by GHS implementation being added on top of existing regulatory requirements which closely align with the WHO and FAO requirements. This is due to agricultural chemicals being treated as a workplace chemical as well as an agricultural chemical. The Australian industry identified zero benefits from the additional regulatory requirements.

The VWG has previously recommended a closer study of GHS implementation for the agricultural sector. The FAO *“Guidelines on Good Labeling Practice for Pesticides”* is widely used within APEC Economies and there appears to be little interest in implementing GHS for the agricultural sector within APEC Economies. Given this information, it may be more prudent to recommend that Economies consider not implementing GHS for the agricultural sector if the Economy is already using rules based on the WHO and FAO requirements. This would ensure that there are no duplicative or conflicting requirements imposed on agricultural chemicals.

SUMMARY AND DISCUSSION

While the implementation of GHS is progressing in the APEC region particularly for the Industrial Workplace sector, its progress appears to be impeded for a number of reasons. As there are different reasons for each of the sectors, the solutions should also be sector specific, noting that not implementing GHS for a particular sector may be the most prudent option in some cases.

It is apparent that the greatest benefit from GHS implementation would be derived from the Industrial Workplace sector if GHS could be implemented consistently between trading partners. Most of the APEC Economies are planning to implement GHS for this sector and many already have legislation in place.

APEC could have a significant role in addressing the consistent implementation of GHS in the APEC region.

For example, there have been numerous discussions in different fora for harmonizing the classification of chemicals. This is a time consuming and costly process which ignores the GHS principle of self-classification. APEC CD could reiterate the GHS principle of self-classification, and recommend that any classification database maintained by APEC Economies be for information only or non-mandatory.. This would ensure that a company could use all of the data available to them to make classification decisions, thus reducing differences in the way the product is classified across all APEC Economies.

While the differences in the building blocks adopted for GHS implementation is recognised as one of the key barriers to achieving true harmonisation, we also recognise that the building block approach and the need for the decisions on implementation to be made by the Competent Authorities within each Economy are key principles of GHS.

APEC Economies should ensure that a company classifying chemicals for building blocks that have not been adopted by the Economy, is not penalised, allowing companies to choose to classify to the maximum number of building blocks adopted in the APEC region. While this is not an ideal solution, it may be an acceptable short term solution until more APEC Economies implement GHS and have more experience with the system. APEC CD could then play a role in encouraging convergence in terms of the building blocks and implementation approaches within APEC.

The implementation of GHS for the consumer products sector does not appear to be progressing. However, noting that the decision on implementation of GHS ultimately rests on

competent authorities, and that it is unlikely that GHS implementation for this sector will deliver any benefits for those Economies with established consumer products regulatory systems, it would be ill-advised to push for a blanket implementation of GHS for this sector.

In addition, APEC CD published a principles document *Approaches for Consideration by APEC Economies in Applying GHS Principles to Classification & Labelling of Consumer Products* for economies considering implementing GHS for consumer products in 2011. The APEC CD also provided a completed case study into different approaches to GHS implementation for consumer products by different APEC Economies in 2012.

The implementation of GHS for the agricultural sector also does not appear to be progressing. However, the implementation of GHS in the industrial workplace sector is affecting the agriculture sector. There is a need to ensure that GHS is not implemented in addition to any Economy's current agricultural regulatory framework based on FAO/WHO to minimise duplicative or conflicting requirements which add cost without providing benefits.

RECOMMENDATIONS

That the CD:

- Notes the report;
- Agrees to provide feedback on the SmartForm with a view to increasing the response rate and better informing Trade Ministers on progress with GHS implementation;
- Recommends that GHS need not be implemented for the agricultural sector if the Economy has existing requirements/specifications based on WHO and FAO requirements. This is to avoid potentially duplicative or conflicting regulatory requirements; and
- Notes that a progress report to Trade Ministers due in November 2015 will be circulated out of session for CD approval. This will provide additional time to incorporate further expected outcomes from the GHS VWG.



**Asia-Pacific
Economic Cooperation**

2015/SOM2/027anx7

Agenda Item: 5.1.1

Annex 7 - Transmission of the Chemical Dialogue's Interim Report to Trade Ministers: Progress on Implementation of the GHS in the APEC Region

Purpose: Consideration
Submitted by: CTI Chair
Forum Doc. No.: 2015/SOM2/CTI/038



APEC
PHILIPPINES
2 0 1 5

**Second Senior Officials' Meeting
Boracay, Philippines
20-21 May 2015**

Trade Facilitation and the Implementation of GHS

Honorable Ministers

Since 2002, at the request of Trade Ministers, the Chemical Dialogue has provided an annual status report on the implementation of the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). The GHS was conceived to promote harmonization of hazard communication in order to improve workers' health and safety, environment protections and facilitate trade. The lack of a harmonized system not only reduces worker and environmental protections, but it also has significant trade effects. Due to the variations in requirements between economies, manufacturers and suppliers are forced to adopt different compliance programs for many individual economies. In addition to the varying requirements, many countries have very different timelines for implementation, adding to the compliance burdens for manufactures and suppliers. A harmonized approach to timing (or at least a consistent transition period) and implementation in a standard manner would help facilitate trade, while also improving hazard communication practices in the APEC economies.

The Chemical Dialogue believes that the benefits to any economy implementing GHS will only be realized with a high level of co-ordination and harmonization within the affected sectors of the economies and regions implementing the GHS. No jurisdiction can meaningfully implement the GHS in isolation. There is no added protection of human health and the environment in having a wide variety of information requirements and evaluation systems. As such, the Chemical Dialogue formed a Virtual Working Group (VWG) on GHS implementation to consider and find solutions to the safety and trade costs associated with uneven and uncoordinated implementation.

In 2014, APEC Ministers Responsible for Trade instructed the Chemical Dialogue to "focus on areas of the GHS in which APEC can contribute to more consistent implementation and to report back to us in 2015 on progress".

Our preliminary findings in response to the MRT direction are that as GHS expands globally, there continues to be differences between economies in the way the GHS is being implemented. This creates variations in requirements for classification, packaging, documentation, and hazard communication, which contribute to reducing efficient communication, increasing user confusion, compounding border delays and increasing compliance costs all of which are felt in the APEC region.

One pathway that the virtual working group is exploring is recommendations for the implementation of GHS. In particular, GHS alignment might be facilitated if APEC economies adopted a common staged implementation. One possible way to do this is to differentiate between substances and mixtures. Substances are often chemical raw materials, and can be classified first, to provide relevant manufacturers of mixtures (mixtures are combinations of substances) hazard information about the ingredients of their mixtures to use when they classify and label their product by a later deadline. These manufacturers are dominated by SMEs and deal with mixtures, mixtures of mixtures, and formulated products, which can contain 10 to 20 difference chemical substances purchased from a variety of upstream suppliers. Thus they can be far more complex to classify.

To this end, the VWG is examining the stages for implementation and realistic timelines for both upstream and downstream industries.

We request that Ministers acknowledge this interim report and note that a full report with agreed recommendations will be provided to Ministers in November 2015.



Asia-Pacific Economic Cooperation

Global Harmonization System (GHS) for Chemical Labelling SmartForm

Tracking Code: **XV5V5G**

Your form has been successfully submitted. Please keep a copy of this acknowledgement for your records.



Date and Time: **08 May 2015 10:19:06 AM**

Receipt
Number: **global-harmonization-4**

To save or print a copy of the completed form and acknowledgement go to the "File" menu and select "Save as" or "Print".

Introduction

Responding for

Please select your economy *

Australia

How are you responding *

- General Information
- As a Regulator for the Industrial Workplace Chemicals Sector
- As a Regulator for the Consumer Products Sector
- As a Regulator for the Agricultural Chemicals Section
- From Industry for the Industrial Workplace Chemicals Sector
- From Industry for the Consumer Products Sector

From Industry for the Agricultural Chemicals Sector

Respondent details

Organisation/Agency

Department of Industry and Science

Name

Dr Craig Johnson

Phone number

02 2613 7350

Email address

Craig.Johnson@industry.gov.au

General Information

General Information

Has your economy implemented GHS for any chemical sector to date?

Yes

No

Is there an overall strategic plan for GHS implementation?

Yes

No

Do you have a GHS co-ordinator to facilitate implementation within your economy?

Yes

No

Please provide your co-ordinators details

Organisation/Agency

Safe Work Australia

Name

Phone number

+61 2 6121 5317

Email address

info@safeworkaustralia.gov.au

Website

www.safeworkaustralia.gov.au

Do you have a hazard classification database?

Yes

No

Is this database mandatory?

Mandatory classification

Information only

How do you access the database?

As GHS is implemented through workplace regulations, the database is for information only.

Regulator Input - IWCS

Industrial Workplace Chemicals Sector

Does your agency or organisation have responsibility for GHS implementation for this sector? *

Yes

No

Please provide the following details

Lead Government Agency

Safe Work Australia

Contact Person

Dr Paul Taylor

Phone number

+61 2 6240 6888

Email address

paul.taylor@safeworkaustralia.gov.au

Website

www.safeworkaustralia.gov.au

Has GHS been implemented for this sector? *

Yes

No

Do you intend to implement GHS for this sector in the next 2 years? *

Yes

No

Which edition of GHS is/was implemented?

Revised Edition 3 (2009)

When is/was GHS fully operational for this sector?

The GHS will be implemented for all chemicals used in workplaces through hazardous chemical regulations under the Work, Health and Safety Act in each jurisdiction in Australia. There is a phased introduction over five years from 2012 introduction.

As at 1 January 2015, six out of the nine jurisdictions (including the Commonwealth) have implemented the new WHS laws incorporating the GHS for classification, labelling and SDS. The remaining 3 jurisdictions allow for the operation of GHS within existing regulations.
The Model Health and Safety legislation on which all State legislation are to be based is finalised. Not all States have implemented the Model Work Health and Safety legislation.

Have you finalised the relevant legislation to implement GHS?

- Yes
- No

Please provide the access details to the documentation. E.g. Website link, contact phone number

<http://www.safeteworkaustralia.gov.au/Legislation/Pages/ModelWHSLegislation.aspx>

Do you intend to adopt all GHS hazard classification building blocks as written in the Purple Book?

- Yes
- No

Please describe the building blocks that will be adopted

Do you intend to adopt any non-GHS classification criteria? E.g. Classification of flammable/combustible liquids beyond 93° Celsius

- Yes
- No

Will there be a risk assessment element overlaid on top of GHS classification on the label?

- Yes
- No

Is there a maximum number of Pictograms, Hazard Statements and Precautionary Statements included on the Safety Data Sheets (SDS)?

Pictograms

Yes

No

Hazard Statements

Yes

No

Precautionary Statements

Yes

No

Is there a maximum number of Pictograms, Hazard Statements and Precautionary Statements included on the label?

Pictograms

Yes

No

Hazard Statements

Yes

No

Precautionary Statements

Yes

No

How is the hierarchy of Pictograms, Hazard Statements and Precautionary Statements defined?

Pictograms and Hazard statements are both required to be on a label for products used in workplaces.

Precautionary statements may be selected by the manufacturer. guidance on labelling allows some precautionary statements to be omitted - recommends maximum 6PS.
Other information (eg Risk-based advice for pesticides) may be present on the label in addition to workplace GHS requirements.

Do you have any arrangements in place to deal with imported chemicals/products? E.g. Will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?

- Yes
- No

What are your arrangements to deal with imported chemicals/products?

"Deem-to-comply" provisions. All jurisdictions prior to implementation of the harmonised WHS laws amended legislation to accept GHS classified and labelled chemicals.
The new WHS laws also allow additional GHS classifications to be communicated on labels.

Do you have training and awareness activities planned?

- Yes
- No

What are your planned training and awareness activities?

Awareness and training materials are planned. Guidance on classification is available from the Safe Work Australia website. Other guidance to assist users understand labels and SDS is also available. Private contractors are available to provide GHS training to Australian business.
Australia is supporting the UN Sub-Committee of Experts on the GHS and the OECD in developing a non-mandatory GHS classification list.

Are there any plans to exchange personnel with another economy to improve harmonisation of GHS implementation?

- Yes
- No

Please list any specific issues of concern you have experienced so far during your GHS implementation efforts

Accommodating differing perspectives on chemical safety issues between industry, regulatory authorities and the general community.

Regulator Input - CPS

Consumer Products Sector

Does your agency or organisation have responsibility for GHS implementation for this sector? *

Yes

No

Please provide the following details

Lead Government Agency

Therapeutic Goods Administration

Contact Person

Phone number

Email address

Website

Has GHS been implemented for this sector? *

Yes

No

Which edition of GHS is/was being implemented?

Revised Edition 3 (2009)

When is/was GHS be fully operational for this sector?

Existing State/Territory Poisons Acts for poisons scheduling (health related classification and labelling) provide a suitable basis. Contacts for information and advice on legislation requirements can be found at <http://www.tga.gov.au/industry/scheduling.htm>. The Therapeutic Goods Act, 1989 and Regulations (Commonwealth) define poisons scheduling arrangements.

The Act can be found via <http://www.tga.gov.au/Industry/scheduling-legislation.htm>.

Environmental elements may require a legislative basis.

Have you finalised the relevant legislation to implement GHS?

Yes

No

Please provide the access details to the documentation. E.g. Website link, contact phone number

<http://www.tga.gov.au/industry/scheduling-legislation.htm>

Do you intend to adopt all GHS hazard classification building blocks as written in the Purple Book?

Yes

No

Please indicate the cut-off points you will be adopting where the choice is given in the Purple Book. E.g. Sensitisers

Under consideration. However, it is desirable that there be integration with existing requirements so as to minimise disruption to existing classification arrangements.

Do you intend to adopt any non-GHS classification criteria? E.g. Classification of flammable/combustible liquids beyond 93° Celsius

Yes

No

Will there be a risk assessment element overlaid on top of GHS classification on the label?

Yes

No

How will it work?

Risk assessment will be overlaid on top of GHS classification. Under the Therapeutic Goods Act, the Poisons Scheduling system requires a range of factors that must be considered in addition to the universal scale of toxicity. These include purpose of use, presentation and packaging, potential for abuse, safety in use, the need for specialist training or personal protective equipment for safe or effective use, and the need for access to the substance. The scheduling policy framework can be found at <http://www.tga.gov.au/pdf/scheduling-policy-framework.pdf>. The Poisons Standard is available at: <http://www.tga.gov.au/industry/scheduling-poisons-standard.htm>.

Is there a maximum number of Pictograms, Hazard Statements and Precautionary Statements included on the Safety Data Sheets (SDS)?

Pictograms

Yes

No

Hazard Statements

Yes

No

How many?

Precautionary Statements

Yes

No

How many?

Is there a maximum number of Pictograms, Hazard Statements and Precautionary Statements included on the label?

Pictograms

Yes

No

Hazard Statements

Yes

No

How many?

Precautionary Statements

Yes

No

How many?

How is the hierarchy of Pictograms, Hazard Statements and Precautionary Statements defined?

Pictograms are not favoured by Health authorities. The hierarchy of hazard statements not yet finalised. Precautionary statements to be added as necessary.

Do you have any arrangements in place to deal with imported chemicals/products? E.g. Will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?

Yes

No

Do you have training and awareness activities planned?

Yes

No

What are your planned training and awareness activities?

To be initiated prior to implementation.

Are there any plans to exchange personnel with another economy to improve harmonisation of GHS implementation?

Yes

No

Please list any specific issues of concern you have experienced so far during your GHS implementation efforts

Ensuring consistency across various chemical sectors where different approaches to labelling are in place.

Regulator Input - ACS

Agricultural Chemicals Sector

Does your agency or organisation have responsibility for GHS implementation for this sector? *

Yes

No

Please provide the following details

Lead Government Agency

Australian Pesticides and Veterinary Medicines Authority (APVMA)

Contact Person

Phone number

Email address

Website

www.apvma.gov.au

Has GHS been implemented for this sector? *

Yes

No

Do you intend to implement GHS for this sector in the next 2 years? *

Yes

No

Which edition of GHS is/was being implemented?

Revised Edition 3 (2009)

When is/was GHS be fully operational for this sector?

GHS is partially implemented by default through implementation of GHS for workplace chemicals applying to agricultural chemicals in Australia.

The timeline to add GHS hazard and precautionary statement on agricultural chemical labels will follow GHS implementation for workplace chemicals.

Safe Work Australia, the agency responsible for implementing GHS for workplace chemicals, is also responsible for implementing some labelling elements of GHS (hazard and precautionary statements only) for agricultural products.

For agricultural chemical product labels that were assessed since the APVMA labelling reform in 2011, WHS laws require the registrant to add GHS labelling elements to produce label.

Have you finalised the relevant legislation to implement GHS?

Yes

No

Please provide the access details to the documentation. E.g. Website link, contact phone number

Do you intend to adopt all GHS hazard classification building blocks as written in the Purple Book?

Yes

No

Please describe the building blocks that will be adopted

Do you intend to adopt any non-GHS classification criteria? E.g. Classification of flammable/combustible liquids beyond 93° Celsius

Yes

No

Will there be a risk assessment element overlayed on top of GHS classification on the label?

Yes

No

How will it work?

GHS information and risk assessment elements will be completely separate. Both sets of information will appear on the label.

The APVMA undertakes a risk assessment for all agvet chemicals and must be satisfied that the label contains adequate instructions for safe and effective use before they are registered. The registration/authorisation is for specific uses set out on the label. The instructions for use, relevant hazard information and various other label content required by agvet chemical legislation (referred to as "relevant label particulars") are approved by the APVMA as an outcome of the risk assessment.

GHS labelling elements are additional to, and independent of, the relevant label particulars approved by the APVMA, and are added by the manufacturer following their self-assessment against the GHS criteria to meet the requirements of the new WHS legislation for workplace chemicals, described above.

Is there a maximum number of Pictograms, Hazard Statements and Precautionary Statements included on the Safety Data Sheets (SDS)?

Pictograms

Yes

No

Hazard Statements

Yes

No

Precautionary Statements

Yes

No

Is there a maximum number of Pictograms, Hazard Statements and Precautionary Statements included on the label?

Pictograms

Yes

No

Hazard Statements

Yes

No

Precautionary Statements

Yes

No

How is the hierarchy of Pictograms, Hazard Statements and Precautionary Statements defined?

Do you have any arrangements in place to deal with imported chemicals/products? E.g. Will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?

Yes

No

What are your arrangements to deal with imported chemicals/products?

All imported agvet chemicals must be assessed and registered by the APVMA.

Do you have training and awareness activities planned?

Yes

No

Are there any plans to exchange personnel with another economy to improve harmonisation of GHS implementation?

Yes

No

Please list any specific issues of concern you have experienced so far during your GHS implementation efforts

Industry Input - IWCS

Industrial Workplace Chemicals Sector

This section is for any industry associates who may wish to comment regarding the GHS implementation process.

Has it been easy to access all necessary information regarding GHS compliance?

Access to necessary information has been inconsistent and patchy. Information on GHS requirements are broadly available but can be difficult to navigate and interpret. While some sectors of industry are managing the transition well, others are struggling with ambiguities and lack of clear interpretation provided by government.

For example, the Australian government has provided a draft, non-mandatory classification list for chemicals based on the classification list in the EU CLP Regulations. However, unlike the EU CLP, the Australian list does not contain the mixture cut-off levels for the classified substances, which has caused some confusion as to whether the cut-off levels used in the EU CLP is acceptable or whether the cut-offs in the GHS text should be used as a default.

Are there specific issues that are limiting the progress of GHS implementation?

Some sectors of industry are expressing concern with the final transition date – especially sectors with complex mixtures, while other participants have well developed and coordinated transition plans.

As all mixtures as well as single substances must comply with GHS by 31 December 2016 this is likely to be difficult for formulators and product manufacturers that are depending on GHS classification information from their upstream suppliers.

There is still need for more training and awareness as well as common understanding of requirements between the regulators and regulated entities.

What are/were the expected costs for industry in the GHS implementation?

- Training for awareness and new procedures (for industry, users and consumers)
- Classification of chemicals/mixtures
- Preparation of GHS safety data sheets and labels
- Management of GHS and non-GHS labels and safety data sheets during transition; including customer inquiries and education
- Increased products (mixtures) being classified as hazardous, resulting in more products requiring special storage licensing e.g. corrosives.

If your economy has implemented GHS, is there any difference in expected cost prior to implementation and actual

While we are yet to fully implement GHS, some industry sectors believe that there will be additional cost for storage of products that are now classified as hazardous (were previously not classified as hazardous).

What are/were the expected benefits for industry through the GHS implementation?

A key question remains as to whether GHS will facilitate trade and reduce transaction costs. Large multi-national enterprises expect that GHS could deliver benefits in managing chemical trade, but differences in implementation (between economies and between regulatory schemes within economies) diminish this opportunity.

If your economy has implemented GHS, is there a difference in expected benefits prior to implementation and actual

As we are currently in the implementation phase, we are yet to understand the full benefits of GHS implementation.

Organisation/Agency

Accord Australasia

Name

Catherine Oh

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Email address

coh@accord.asn.au

Industry Input - CPS

Consumer Products Sector

This section is for any industry associates who may wish to comment regarding the GHS implementation process.

Has it been easy to access all necessary information regarding GHS compliance?

Yes, so far. The Department of Health and Ageing (DoHA) has been active in consultation with industry. DoHA's consideration of different options for the adoption of GHS for the consumer products sector, including the preferred option for adoption is publicly available.

[http://www.health.gov.au/internet/main/publishing.nsf/Content/7FE108F56018FC1DCA2575910011D11E/\\$File/GHS%20Discussion%20Paper_Final%20Draft%20for%20Approval_16%20March%202009.pdf](http://www.health.gov.au/internet/main/publishing.nsf/Content/7FE108F56018FC1DCA2575910011D11E/$File/GHS%20Discussion%20Paper_Final%20Draft%20for%20Approval_16%20March%202009.pdf).

However, this consideration was done many years ago, and there has been no discussion on GHS since then. It is our understanding that GHS will not be implemented for consumer products sector and risk based regulations will continue to be applied.

Are there specific issues that are limiting the progress of GHS implementation?

No. There is some confusion due to perceived overlaps in regulatory controls. Some consumer products are regulated as medicines (e.g. some toothpastes, mouthwashes and sunscreen) under the Therapeutic Goods Act 1989 (Cth) and some as agvet chemicals (e.g. household pesticides and herbicides) under the Agricultural and Veterinary Chemicals Code Act 1994.

In some sections of the Work Health and Safety legislation which implements GHS for workplace chemicals, all consumer products are excluded from workplace chemical labeling requirements if they are used in a manner that is consistent with normal consumer use. In other sections it is stated that all agvet chemicals and some therapeutic goods must include some workplace labeling elements.

Industry has attempted work through this inconsistency at the drafting stage of workplace chemicals legislation with some success, but unfortunately ambiguity still remains.

What are/were the expected costs for industry in the GHS implementation?

The current proposal by DoHA will help to minimize the cost to industry by providing expert risk assessment, and little change is expected for substances that have already gone through risk assessment. However, no work has progressed by DoHA since the initial proposal in 2009.

The implementation of GHS in this sector (as per the DoHA preferred option in its consultation document) is not expected to have a significant impact on industry. We expect that regulators will witness more changes, as they move to GHS hazard classification system to perform their risk assessment. There are some changes expected in control of some consumer products since GHS hazard classification appears more conservative than the current system, particularly for mixtures.

Long transition period and consistent and transparent communication on the new requirements from governments as they are developed will also help to reduce the cost for industry in implementing of GHS.

If your economy has implemented GHS, is there any difference in expected cost prior to implementation and actual

What are/were the expected benefits for industry through the GHS implementation?

Very little benefit is expected through the implementation of GHS. Australian consumer product regulations

currently provide good public health and safety outcomes.

Implementation of GHS classification criteria is accepted as necessary since all classification of downstream chemicals including consumer products will depend on the classification of upstream chemicals. The workplace chemicals sector, which includes all manufacturing sectors, has already begun implementation of GHS in some Australian States and Territories.

If your economy has implemented GHS, is there a difference in expected benefits prior to implementation and actual

Organisation/Agency

Accord Australasia

Name

Catherine Oh

Phone number

+61 2 9281 2322

Email address

coh@accord.asn.au

Industry Input - ACS

Agricultural Chemicals Sector

This section is for any industry associates who may wish to comment regarding the GHS implementation process.

Has it been easy to access all necessary information regarding GHS compliance?

Information regarding hazard and precautionary statements required by workplace regulators is available, but is difficult to find for agricultural chemical registrants as it is not available from APVMA. Conflicting requirements from risk-based APVMA approved label particulars and GHS hazard-based workplace requirements are creating confusion among product registrants.

Are there specific issues that are limiting the progress of GHS implementation?

Two separate regulators have imposed differing regulatory standards on agricultural chemicals used in the workplace. This will make compliance by product registrants difficult and risks providing users with inaccurate, confusing and contradictory information about the hazards and risks associated with the product. APVMA has stated that it will not be assessing hazard and precautionary statements required by workplace regulators.

What are/were the expected costs for industry in the GHS implementation?

Direct costs include regulatory costs associated with updating all product labels to meet workplace labeling requirements. This will also involve regulatory approval for revised label statements. These costs have been estimated to be \$60.5million during the transitional phase.

Indirect costs include:

- Recertification of distribution, transport and retail supply chains in accordance with existing stewardship arrangements; and
- Retraining existing users so that they may understand how to use new information included on labels.

Costs of additional training are estimated to be \$50million. Total costs of GHS implementation in this sector is expected to exceed \$110m. This does not include opportunity costs from delaying or precluding the introduction of new crop protection technologies.

Additional costs may also be incurred through creating labels with excessive numbers of hazard and precautionary statements that result in user confusion and consequently poorer risk management decision

If your economy has implemented GHS, is there any difference in expected cost prior to implementation and actual

What are/were the expected benefits for industry through the GHS implementation?

Australia is fortunate to have a well-developed and rigorous risk-based system for labeling agricultural chemicals administered by the Australian Pesticides and Veterinary Medicines Authority. This is supported by existing requirements for all workplaces to have Safety Data Sheets for all hazardous chemicals in that workplace.

The APVMA's labeling system includes requiring hazard information that is relevant to the use of the product. Under APVMA arrangements, some hazard information can be excluded from labels where that hazard does not give rise to anything more than a negligible risk to workers and other users. This is consistent with FAO and WHO best practice guidance with respect to agricultural chemical products.

Extending hazard information on labels (which is already required to be kept on workplace SDSs) is not expected to provide any human health or workplace safety benefits. As noted above, there is a real risk that additional complexity and confusing labels may result in

If your economy has implemented GHS, is there a difference in expected benefits prior to implementation and actual

Organisation/Agency

Accord Australasia

Name

Catherine Oh

Phone number

+61 2 9281 2322

Email address

coh@accord.asn.au



Asia-Pacific Economic Cooperation

Global Harmonization System (GHS) for Chemical Labelling SmartForm

Tracking Code: **XV4WVF**

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Date and Time: **18 Mar 2015 9:23:53 PM**

Receipt
Number: **global-harmonization-2**

To save or print a copy of the completed form and acknowledgement go to the "File" menu and select "Save as" or "Print".

Introduction

Responding for

Please select your economy *

Hong Kong, China

How are you responding *

- General Information
- As a Regulator for the Industrial Workplace Chemicals Sector
- As a Regulator for the Consumer Products Sector
- As a Regulator for the Agricultural Chemicals Section
- From Industry for the Industrial Workplace Chemicals Sector
- From Industry for the Consumer Products Sector

From Industry for the Agricultural Chemicals Sector

Respondent details

Organisation/Agency

Name

Phone number

Email address

General Information

General Information

Has your economy implemented GHS for any chemical sector to date?

Yes

No

Does your economy plan to implement GHS for any chemical sector in the next two years? *

Yes

No

Do you have a hazard classification database?

Yes

No



Asia-Pacific Economic Cooperation

Global Harmonization System (GHS) for Chemical Labelling SmartForm

Tracking Code: **R7TWKW**

Your form has been successfully submitted. Please keep a copy of this acknowledgement for your records.



Date and Time: **17 Apr 2015 7:32:03 PM**

Receipt
Number: **global-harmonization-7**

To save or print a copy of the completed form and acknowledgement go to the "File" menu and select "Save as" or "Print".

Introduction

Responding for

Please select your economy *

Japan

How are you responding *

- General Information
- As a Regulator for the Industrial Workplace Chemicals Sector
- As a Regulator for the Consumer Products Sector
- As a Regulator for the Agricultural Chemicals Section
- From Industry for the Industrial Workplace Chemicals Sector
- From Industry for the Consumer Products Sector

From Industry for the Agricultural Chemicals Sector

Respondent details

Organisation/Agency

Name

Phone number

Email address

General Information

General Information

Has your economy implemented GHS for any chemical sector to date?

Yes

No

Is there an overall strategic plan for GHS implementation?

Yes

No

You will be prompted to add an attachment when you submit the form.

Do you have a GHS co-ordinator to facilitate implementation within your economy?

Yes

No

Please provide your co-ordinators details

Organisation/Agency

Ministry of Health, Labour, and Welfare (MHLW)

Name

Ms. Yurie Ohno

Phone number

+81-3-3502-6756

Email address

oono-yurie@mhlw.go.jp

Website

<http://www.mhlw.go.jp/>

Do you have a hazard classification database?

Yes

No

Is this database mandatory?

Mandatory classification

Information only

How do you access the database?

Japanese government has classified approximately 3,000 substances, including approximately 1,400 substances regulated by the relevant Japanese laws, since 2006. METI and MHLW classified the substances with regards to the hazard for a physical and human health and MOE classified them with regards to the hazard for aquatic environment and ozone layer. The classification results, including the rationale for classification, were available on the website of NITE in Japanese and that this information, with the exception of the rationale for the classification of some substances, was also available in English. (NITE website: http://www.safe.nite.go.jp/english/ghs_index.html, OECD eChemPortal: <http://www.echemportal.org/>). • METI developed the computer software for GHS classification of mixtures, which is available in Japanese and English, based on the 4th revision of GHS Purple Book and 'Building Block approach' in Japan in 2014. By inputting the GHS classification results of substances in the

Regulator Input - IWCS

Industrial Workplace Chemicals Sector

Does your agency or organisation have responsibility for GHS implementation for this sector? *

Yes

No

Please provide the following details

Lead Government Agency

Ministry of Health, Labour and Welfare

Contact Person

Ms. Yurie Ohno

Phone number

+81-3-3502-6756

Email address

oono-yurie@mhlw.go.jp

Website

<http://www.mhlw.go.jp/>

Has GHS been implemented for this sector? *

Yes

No

Which edition of GHS is/was implemented?

When is/was GHS fully operational for this sector?

Have you finalised the relevant legislation to implement GHS?

Yes

No

Please provide the access details to the documentation. E.g. Website link, contact phone number

Web-link (<http://www.mhlw.go.jp/topics/bukyoku/roudou/ghs/index.html>)

Do you intend to adopt all GHS hazard classification building blocks as written in the Purple Book?

Yes

No

Please indicate the cut-off points you will be adopting where the choice is given in the Purple Book. E.g. Sensitisers

Cut-off values are listed for 107 substances for labelling and 640 substances for delivering SDS under the Ordinance on Industrial Safety and Health

Do you intend to adopt any non-GHS classification criteria? E.g. Classification of flammable/combustible liquids beyond 93° Celsius

Yes

No

Will there be a risk assessment element overlayed on top of GHS classification on the label?

Yes

No

Is there a maximum number of Pictograms, Hazard Statements and Precautionary Statements included on the Safety Data Sheets (SDS)?

Pictograms

Yes

No

Hazard Statements

Yes

No

Precautionary Statements

Yes

No

Is there a maximum number of Pictograms, Hazard Statements and Precautionary Statements included on the label?

Pictograms

Yes

No

Hazard Statements

Yes

No

Precautionary Statements

Yes

No

How is the hierarchy of Pictograms, Hazard Statements and Precautionary Statements defined?

As prescribed by GHS1.4.10.5.3

Do you have any arrangements in place to deal with imported chemicals/products? E.g. Will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?

Yes

No

Do you have training and awareness activities planned?

Yes

No

Are there any plans to exchange personnel with another economy to improve harmonisation of GHS implementation?

Yes

No

Please list any specific issues of concern you have experienced so far during your GHS implementation efforts

Regulator Input - CPS

Consumer Products Sector

Does your agency or organisation have responsibility for GHS implementation for this sector? *

Yes

No

Regulator Input - ACS

Agricultural Chemicals Sector

Does your agency or organisation have responsibility for GHS implementation for this sector? *

Yes

No

Industry Input - IWCS

Industrial Workplace Chemicals Sector

This section is for any industry associates who may wish to comment regarding the GHS implementation process.

Has it been easy to access all necessary information regarding GHS compliance?

Are there specific issues that are limiting the progress of GHS implementation?

What are/were the expected costs for industry in the GHS implementation?

If your economy has implemented GHS, is there any difference in expected cost prior to implementation and actual

What are/were the expected benefits for industry through the GHS implementation?

If your economy has implemented GHS, is there a difference in expected benefits prior to implementation and actual

Organisation/Agency

Name

Phone number

Email address

Industry Input - CPS

Consumer Products Sector

This section is for any industry associates who may wish to comment regarding the GHS implementation process.

Has it been easy to access all necessary information regarding GHS compliance?

GHS for consumer products is not mandatory in Japan. Therefore, voluntary approaches are considered to be much important. To encourage industry activities, several guidance documents and other tools are available. As for consumer products, Inter-Ministerial Committee on GHS decided to adopt risk-based labelling for consumer products (Annex 5) in 2007. And the guidance document named "Basic Procedures of Risk Assessment for GHS Labelling of Consumer Products" was prepared in 2008. The English version of guidance document is available from http://www.nite.go.jp/en/chem/risk/ghs_consumer_product.html. Also a calculation tool for consumer products has been developed; the title of it: Human Exposure Estimation Software for Consumer Products (CHEM-NITE). As some industry activities, e.g. Japan Soap and Detergent Association has developed the guidance document for their products http://jsda.org/w/e_engls/e_ghs01.html, and start GHS based labelling for a part of their products in 2011. It is e

Are there specific issues that are limiting the progress of GHS implementation?

Lack of experts to classify and label consumer products, especially in SMEs

What are/were the expected costs for industry in the GHS implementation?

The guidance documents (first box) contributed industry not only to reduce their workload but also to effectively implement GHS. In addition, the guidance document avoids stakeholders' confusion for labelling results of similar type of products.

If your economy has implemented GHS, is there any difference in expected cost prior to implementation and actual

What are/were the expected benefits for industry through the GHS implementation?

- Support consumer products industries to develop their technical guidance to implement GHS.
- Support and/or lead training staffs not only in domestic but also in other APEC economies.

If your economy has implemented GHS, is there a difference in expected benefits prior to implementation and actual

Organisation/Agency

Name

Phone number

Email address

Industry Input - ACS

Agricultural Chemicals Sector

This section is for any industry associates who may wish to comment regarding the GHS implementation process.

Has it been easy to access all necessary information regarding GHS compliance?

Are there specific issues that are limiting the progress of GHS implementation?

What are/were the expected costs for industry in the GHS implementation?

If your economy has implemented GHS, is there any difference in expected cost prior to implementation and actual

What are/were the expected benefits for industry through the GHS implementation?

If your economy has implemented GHS, is there a difference in expected benefits prior to implementation and actual

Organisation/Agency

Name

Phone number

Email address



Asia-Pacific Economic Cooperation

Global Harmonization System (GHS) for Chemical Labelling SmartForm

Tracking Code: 7H3VWM

Your form has been successfully submitted. Please keep a copy of this acknowledgement for your records.



Date and Time: **09 Apr 2015 3:48:11 AM**

Receipt
Number: **global-harmonization-6**

To save or print a copy of the completed form and acknowledgement go to the "File" menu and select "Save as" or "Print".

Introduction

Responding for

Please select your economy *

Mexico

How are you responding *

- General Information
- As a Regulator for the Industrial Workplace Chemicals Sector
- As a Regulator for the Consumer Products Sector
- As a Regulator for the Agricultural Chemicals Section
- From Industry for the Industrial Workplace Chemicals Sector
- From Industry for the Consumer Products Sector

From Industry for the Agricultural Chemicals Sector

Respondent details

Organisation/Agency

Name

Phone number

Email address

Regulator Input - CPS

Consumer Products Sector

Does your agency or organisation have responsibility for GHS implementation for this sector? *

Yes

No

Please provide the following details

Lead Government Agency

Contact Person

Phone number

Email address

Website

Has GHS been implemented for this sector? *

Yes

No

Do you intend to implement GHS for this sector in the next 2 years? *

Yes

No

General

Please provide the Economy for which this Template is completed below.	
Peru	
Does your Economy intend to adopt and implement GHS for any chemical sector in the near future (Starting work within the next 2 years)?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<i>If yes, go to next question. If no, no further answers are required.</i>	
Is there an overall strategic plan for GHS implementation?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, where can it be found? Please list websites, attach documents, etc.	
Do you have a GHS coordinator to facilitate implementation discussions within your economy?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	
Name	
Phone number	
E-mail address	
Website	
Do you have a hazard classification database?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, is it mandatory classification, or for information only? How do you access the database?	

Industrial Workplace

<i>Regulator to complete</i>	
Do you intend to implement GHS for this sector?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If yes, please provide the following details. If no, no further answers are required for this section.</i>	
Lead Government Agency	Ministry of Environment
Contact person	Vilma Morales
Phone number	+51 1 611 6000
E-mail address	vmorales@minam.gob.pe
Website	www.minam.gob.pe
When do you plan to implement GHS for this sector?	
When the regulation on material safety data sheet is approved	
How long is the phase in period and what are the transition arrangements?	
-	
Are the main relevant legislations implementing GHS finalized and in operation?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
Do you intend to adopt all hazard classification building blocks GHS as is written in the purple book?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please describe the building blocks that will be adopted.	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	

Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
<i>Industry to complete</i>
Has it been easy to access all necessary information for compliance?
Information is available
Do you see any specific issues that are limiting the progress of GHS implementation?
We would recommend more commitment from authorities.
What are the expected costs for industry in the implementation of GHS?
System information change (labeling and material safety data sheet). Substances classification. Training regarding new system (workers, users, transport workers, etc.).
What are the expected benefits for industry through the implementation of GHS?
Reduction of accidents for workers and users. Standardization of hazard information system. Trade facilitation. Compliance with international requirements.

Consumer Products

Regulator to complete	
Do you intend to implement GHS for this sector?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
<i>If yes, please provide the following details. If no, no further answers are required for this sector.</i>	
Lead Government Agency	
Contact person	
Phone number	
E-mail address	
Website	
When do you plan to implement GHS for this sector?	
How long is the phase in period and what are the transition arrangements?	
Are the main relevant legislations finalized?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
Do you intend to adopt all hazard classification building blocks GHS as is written in the purple book?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please describe the building blocks that will be adopted.	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	

Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
<i>Industry to complete</i>
Has it been easy to access all necessary information for compliance?
Do you see any specific issues that are limiting the progress of GHS implementation?
What are the expected costs for industry in the implementation of GHS?
What are the expected benefits for industry through the implementation of GHS?

Agriculture

<i>Regulator to complete</i>	
Do you intend to implement GHS for this sector?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
<i>If yes, please provide the following details. If no, no further answers are required for this sector.</i>	
Lead Government Agency	
Contact person	
Phone number	
E-mail address	
Website	
When do you plan to implement GHS for this sector?	
How long is the phase in period and what are the transition arrangements?	
Are the main relevant legislations finalized?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
Do you intend to adopt all hazard classification building blocks of GHS as is written in the purple book?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please describe the building blocks that will be adopted.	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS	

implementation?
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
<i>Industry to complete</i>
Has it been easy to access all necessary information for compliance?
Do you see any specific issues that are limiting the progress of GHS implementation?
What are the expected costs for industry in the implementation of GHS?
What are the expected benefits for industry through the implementation of GHS?



Asia-Pacific Economic Cooperation

Global Harmonization System (GHS) for Chemical Labelling SmartForm

Tracking Code: **3CRL3D**

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Date and Time: **30 Mar 2015 12:45:50 PM**

Receipt
Number: **global-harmonization-5**

To save or print a copy of the completed form and acknowledgement go to the "File" menu and select "Save as" or "Print".

Introduction

Responding for

Please select your economy *

Vietnam

How are you responding *

- General Information
- As a Regulator for the Industrial Workplace Chemicals Sector
- As a Regulator for the Consumer Products Sector
- As a Regulator for the Agricultural Chemicals Section
- From Industry for the Industrial Workplace Chemicals Sector
- From Industry for the Consumer Products Sector

From Industry for the Agricultural Chemicals Sector

Respondent details

Organisation/Agency

Vietnam Chemicals Agency

Name

NGUYEN THI HA

Phone number

+84 (0)4 22205136

Email address

hanth@moit.gov.vn

General Information

General Information

Has your economy implemented GHS for any chemical sector to date?

Yes

No

Is there an overall strategic plan for GHS implementation?

Yes

No

You will be prompted to add an attachment when you submit the form.

Do you have a GHS co-ordinator to facilitate implementation within your economy?

Yes

No

Do you have a hazard classification database?

Yes

No

Regulator Input - CPS

Consumer Products Sector

Does your agency or organisation have responsibility for GHS implementation for this sector? *

Yes

No

Please provide the following details

Lead Government Agency

Vietnam Chemicals Agency

Contact Person

Nguyen Thi Ha

Phone number

+84 (0)4 22205136

Email address

hanth@moit.gov.vn

Website

vinachemia.gov.vn

Has GHS been implemented for this sector? *

Yes

No

Which edition of GHS is/was being implemented?

Revised Edition 3 (2009)

When is/was GHS be fully operational for this sector?

2016

Have you finalised the relevant legislation to implement GHS?

Yes

No

When do you expect this to be finalised?

2018

Do you intend to adopt all GHS hazard classification building blocks as written in the Purple Book?

Yes

No

Please indicate the cut-off points you will be adopting where the choice is given in the Purple Book. E.g. Sensitisers

Almost fully applied 3th version Purple book

Do you intend to adopt any non-GHS classification criteria? E.g. Classification of flammable/combustible liquids beyond 93° Celsius

Yes

No

Will there be a risk assessment element overlayed on top of GHS classification on the label?

Yes

No

Is there a maximum number of Pictograms, Hazard Statements and Precautionary Statements included on the Safety Data Sheets (SDS)?

Pictograms

Yes

No

Hazard Statements

Yes

No

Precautionary Statements

Yes

No

Is there a maximum number of Pictograms, Hazard Statements and Precautionary Statements included on the label?

Pictograms

Yes

No

Hazard Statements

Yes

No

Precautionary Statements

Yes

No

How is the hierarchy of Pictograms, Hazard Statements and Precautionary Statements defined?

Yes, in accordance with GHS

Do you have any arrangements in place to deal with imported chemicals/products? E.g. Will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?

Yes

No

Do you have training and awareness activities planned?

Yes

No

What are your planned training and awareness activities?

Conduct training course, workshop on GHS, Vietnam Circular on GHS

Are there any plans to exchange personnel with another economy to improve harmonisation of GHS implementation?

Yes

No

Please list any specific issues of concern you have experienced so far during your GHS implementation efforts

Not harmonise the chemical classification and labelling between the countries because the blocking and cut off value point are different

Industry Input - CPS

Consumer Products Sector

This section is for any industry associates who may wish to comment regarding the GHS implementation process.

Has it been easy to access all necessary information regarding GHS compliance?

Are there specific issues that are limiting the progress of GHS implementation?

What are/were the expected costs for industry in the GHS implementation?

If your economy has implemented GHS, is there any difference in expected cost prior to implementation and actual

What are/were the expected benefits for industry through the GHS implementation?

If your economy has implemented GHS, is there a difference in expected benefits prior to implementation and actual

Organisation/Agency

Vietnam Chemicals Agency

Name

NGUYEN THI HA

Phone number

+84 (0)4 22205136

Email address

hanth@moit.gov.vn

General

Please provide the Economy for which this Template is completed below.	
Completed on the United States (U.S.) by the American Petroleum Institute (API) on April 1, 2015	
Does your Economy intend to adopt and implement GHS for any chemical sector in the near future (Starting work within the next 2 years)? The U.S. transportation sector has already adopted and implemented the GHS. OSHA published the final GHS rule for the industrial/workplace sector on March 26, 2012 and implementation has started with the main compliance date of June 1, 2015.	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If yes, go to next question. If no, no further answers are required.</i>	
Is there an overall strategic plan for GHS implementation? Each U.S. agency/sector has its own statutory authorities and implementing regulations. Each agency/sector will develop its own GHS implementation plan.	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, where can it be found? Please list websites, attach documents, etc.	
Do you have a GHS coordinator to facilitate implementation discussions within your economy? The U.S. coordinates GHS implementation through an interagency committee.	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Environmental Protection Agency (EPA); Occupational Safety and Health Administration (OSHA); Department of Transportation (DOT); Consumer Product Safety Commission (CPSC)
Name	Interagency Coordinating Group on Harmonization Contact: Maureen Ruskin/OSHA
Phone number	1-202-693-1955
E-mail address	Ruskin.Maureen@dol.gov
Website	http://www.osha.gov/dsg/hazcom/index.html
Do you have a hazard classification database?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, is it mandatory classification, or for information only? How do you access the database? U.S. DOT uses the UN Orange Book classification list as a basis for its HMT table/list.	

Industrial Workplace

<i>Regulator to complete</i>	
Do you intend to implement GHS for this sector?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If yes, please provide the following details. If no, no further answers are required for this section.</i>	
Lead Government Agency	
Contact person	
Phone number	
E-mail address	
Website	
When do you plan to implement GHS for this sector?	
How long is the phase in period and what are the transition arrangements?	
Are the main relevant legislations implementing GHS finalized and in operation?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
Do you intend to adopt all hazard classification building blocks GHS as is written in the purple book?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please describe the building blocks that will be adopted.	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	

Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.

Industry to complete

Has it been easy to access all necessary information for compliance?

OSHA published their requirements to implement the GHS on March 26, 2012. OSHA has published a few HazCom 2012 implementation tools. More detailed guidance is urgently needed to assist in implementation. The guidance should have been available in time for companies to use in their HazCom 2012 compliance strategies. OSHA has stated that they intend to update HazCom 2012 to align with GHS Revision 6 but have not specified a timeframe. OSHA has not published all their HazCom 2012 letters of interpretation.

OSHA has started to hold meetings to obtain stakeholder input prior to UNSCEGHS meetings which will impact future GHS revisions as well as OSHA Hazard Communication Standard (HCS) revisions. Unfortunately, the UNSCEGHS process is not transparent. Most positions and technical documents are developed/agreed in inter-sessional groups. Unless you are a member of these inter-sessional groups, this information is not available to stakeholders until it has been largely agreed upon and posted on the UNSCEGHS website.

Global Industrial Workplace Issues:

It is not always possible to keep up to date and find necessary GHS compliance information from some APEC economies. Some countries/economies have restricted access to regulations, information and/or websites to domestic companies, which may present potential trade barriers, particularly with respect to the non-discriminatory and national treatment provisions under the WTO. This also is contrary to the objectives of the GHS. For example, Korea only allows password access to domestic companies.

Even when the regulations/legislation/standards are available, all of the information that is required for compliance is not always specified. For example, the GHS includes several options for mixture cut-off values and some countries include all options without specifying which is appropriate for compliance.

Sometimes implementation dates are published, but the related implementing regulations are not yet finalized, or the regulations are finalized but the transition period and implementation dates are not clear. Only the EU CLP has a clear schedule for implementing updates to the GHS via their ATP process.

Do you see any specific issues that are limiting the progress of GHS implementation?

- To achieve the goal of harmonization and reap the associated benefits, OSHA/governments should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries. The OSHA final GHS rule is generally aligned with the GHS, but there are several issues that are not aligned, e.g., mandatory precautionary statements, combustible dusts, Hazards, Not Otherwise Classified (HNOCs).
- Collaboration is needed among the U.S. Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the GHS final rule. However, EPA and CPSC are not making progress in implementing the GHS. Although CPSC finalized a revised definition of strong sensitizer, CPSC has stated that GHS implementation is on hold due to other priorities. The International Maritime Organization (IMO)/Coast Guard activities related to SDSs do not promote global harmonization and a consistent SDS format. On April 9, 2012, the Coast Guard published a NPRM which creates a new requirement to specifically require SDSs for cargoes on ships. The format of this NPRM SDS example is inconsistent with the UN's GHS framework, inconsistent with OSHA's adoption of the GHS in HazCom 2012, and based on GHS Rev-2.
- More detailed HazCom 2012 guidance from OSHA is needed to assist in implementation. The HazCom guidance should have been available in time for companies to use in their HazCom 2012 compliance strategies. OSHA has stated that they intend to update HazCom 2012 to align with GHS Revision 6 but have not specified a timeframe. OSHA needs to publish all their

HazCom 2012 letters of interpretation as soon as possible.

- To promote globally harmonized classifications, the UNSCEGHS PCI group should address harmonization of interpretations of the GHS classification provisions (e.g., UVCBs) as well as developing classification examples.
- In order to have broad acceptance of a UN global list of classified chemicals, the UNSCEGHS should ensure that the guiding principles are addressed in the pilot program.

What are the expected costs for industry in the implementation of GHS?

- Significant costs are anticipated for SDS revisions, re-labelling, re-distributing revised SDSs to customers, and employee training. Information Technology (IT) solutions (i.e., software) are already available through major vendors offering SDS authoring systems supporting GHS. Although in many cases the bulk of the software (i.e., algorithm) work is complete, country or regional differences in regulatory provisions may require upgrades.
- API member companies issue tens of thousands of SDSs that will need revision to meet the OSHA GHS final rule. For example, one API member company currently has approximately 4,500 SDSs for the U.S. market, all of which will require revision under the OSHA GHS final rule. For this one company, approximately 10,000 U.S. employees would be affected, e.g., require updated training.
- Non-harmonized issues like HNOCs and combustible dusts add to the cost of doing business internationally. Non-harmonized SDS formats, e.g., the IMO/Coast Guard format, also add to the cost of doing business internationally.

Costs for industry can be reduced by the following:

- To achieve the goal of harmonization and reap the associated benefits, OSHA/governments should align the HCS with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries/governments, e.g., SDS formats, combustible dusts and HNOCs.
- OSHA/governments should be as consistent as possible with European Union (EU) GHS implementation and the GHS as negotiated at the UN, especially for hazard classes/categories for mixture cut-off values/concentration limits and for the effective dates and transition periods.
- Manufacturers should be allowed to use their own precautionary statements in addition to the precautionary statements in the GHS, which should be non-binding suggestions.

API suggests providing at least the following assistance materials:

- electronic guided learning tools with modules for awareness training, classification of chemicals, and training on pictograms;
- posters with pictograms and explanations (in multiple languages) for workplaces; and
- a reference table with the differing requirements around the globe.

Detailed technical guidance should be provided on cut-off interpretations and classification criteria for substances and mixtures. Easy to understand guidance should be issued on calculations of acute toxicity estimates, including example calculations.

What are the expected benefits for industry through the implementation of GHS?

Expected benefits for industry through the implementation of the GHS include:

- Internationally harmonized hazard classification and communication will lead to increased worker protection, especially as the new hazard pictograms become recognized.
- Standardization will improve training and understanding of SDSs.
- Consistent information on SDSs will improve downstream hazard assessment activities.

The costs for industry can be reduced by the following:

- GHS must be implemented comprehensively and consistently across industries on a global basis.
- Governments should work closely with each other to ensure alignment to the UN-endorsed version of the GHS and to minimize country-specific deviations, e.g. combustible dusts and SDS formats.
- OSHA/governments need to ensure and set forth a process for U.S. stakeholder input at the earliest possible stage into future GHS technical decisions through negotiations at the UN Sub-

Committee of Experts on the GHS (UNSCEGHS).

- OSHA/governments should support sector-specific guidance, including providing web links to relevant documents.
- Manufacturers should be allowed to use their own precautionary statements in addition to the precautionary statements in the GHS, which should be non-binding suggestions.

The differences in GHS mixture classification cutoff values/thresholds between countries are an impediment to harmonization. It might be useful to convene a working group to look at the possibility of providing harmonized GHS mixture classification cutoff values/thresholds. Different interpretations of how to apply the GHS classification criteria to UVCBs are a potential impediment to harmonization. The OSHA HazCom 2012 approach to combustible dusts is a potential impediment to harmonization. The Coast Guard SDS format is a potential impediment to harmonization.

Consumer Products

Regulator to complete	
Do you intend to implement GHS for this sector?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If yes, please provide the following details. If no, no further answers are required for this sector.</i>	
Lead Government Agency	
Contact person	
Phone number	
E-mail address	
Website	
When do you plan to implement GHS for this sector?	
How long is the phase in period and what are the transition arrangements?	
Are the main relevant legislations finalized?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
Do you intend to adopt all hazard classification building blocks GHS as is written in the purple book?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please describe the building blocks that will be adopted.	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	

Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
Industry to complete
Has it been easy to access all necessary information for compliance?
<p>The GHS has not yet been implemented by the CPSC in the U.S. for consumer products. Information on the progress/status is not readily available to stakeholders. CPSC revised their definition of “strong sensitizer”. The accompanying staff guidance document was not easy to access and has not yet been updated to consider comments received during the rule making.</p> <p>OSHA recently published a letter of interpretation stating that OSHA may consider the CPSC or any other agency-required label information as HazCom 2012 supplemental label information and provided clarification on including this type HazCom 2012 supplemental information on labels. CPSC has not made its position on CPSC/FHSA and HazCom 2012 dual labeling readily available.</p> <p>Global Issues:</p> <p>It is not always possible to keep up to date and find the necessary GHS compliance information from some APEC economies. Also, it is not always easy to understand which sectors are covered by the implementing regulations/legislation/standards. Some countries/economies have restricted access to regulations, information and/or websites to domestic companies only. This is contrary to the objectives of the GHS.</p> <p>Even when the regulations/legislation/standards are available, all of the information that is required for compliance is not always specified. For example, the GHS includes several options for mixture cut-off values and some countries include all options without specifying which is appropriate for compliance.</p> <p>Sometimes implementation dates are published, but the related implementing regulations are not yet finalized, or the regulations are finalized but the transition period and implementation dates are not clear. Only the EU CLP has a clear schedule for implementing updates to the GHS via their ATP process.</p>
Do you see any specific issues that are limiting the progress of GHS implementation?
<ul style="list-style-type: none"> • For consumer products, the use of risk-based labeling for chronic effects could be an implementation issue. CPSC’s revised definition of “strong sensitizer” does not use risk in a manner that is consistent with the GHS. • To achieve the goal of harmonization and reap the associated benefits, governments should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries. • Collaboration is needed among Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the final GHS rule. However, EPA and CPSC are not making progress in implementing the GHS. Although CPSC finalized a revised definition of strong sensitizer, CPSC has stated that GHS implementation is on hold due to other priorities. The IMO/Coast Guard activities related to SDSs do not promote global harmonization and a consistent SDS format. On April 9, 2012, the Coast Guard published a NPRM which creates a new requirement to specifically require SDSs for cargoes on ships. The format of the SDS example is inconsistent with the UN’s GHS framework, inconsistent with OSHA’s adoption of the GHS in HazCom-2012, and based on GHS Rev-2. • While CPSC revised their definition of “strong sensitizer”, the definition, and suggested label elements are not aligned with the GHS/OSHA HazCom 2012. Although the revised “strong sensitizer” definition became effective on March 17, 2014, the “strong sensitizer” staff guidance document has not yet been updated to consider comments received during the rule making.
What are the expected costs for industry in the implementation of GHS?
It is expected that initial implementation costs for industry will be significant. If harmonization is achieved, then cost savings can be realized in the future.

Costs for industry can be reduced by the following:

- To achieve the goal of harmonization and reap the associated benefits, governments should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries.
- Manufacturers should be allowed to use their own precautionary statements in addition to the precautionary statements in the GHS, which should be non-binding suggestions.

What are the expected benefits for industry through the implementation of GHS?

Expected benefits for industry through the implementation of GHS include:

- Internationally harmonized hazard classification and communication will lead to increased protection, especially as the new hazard pictograms become recognized.
- Standardization will improve training and understanding of hazards.
- Consistent information will improve downstream hazard assessment activities.

The following activities are needed to reduce the potential risks of not achieving the benefits:

- Benefits will accrue if the GHS is implemented comprehensively and consistently across industries on a global basis.
- Governments should work closely with each other to ensure alignment to the UN endorsed version of the GHS and to minimize country-specific deviations.
- Manufacturers should be allowed to use their own precautionary statements in addition to the precautionary statements in the GHS, which should be non-binding suggestions.

The differences in GHS mixture classification cutoff values/thresholds between countries are an impediment to harmonization. It might be useful to convene a working group to look at the possibility of providing harmonized GHS mixture classification cutoff values/thresholds. Different interpretations of how to apply the GHS classification criteria to UVCBs are a potential impediment to harmonization.

Agriculture

<i>Regulator to complete</i>	
Do you intend to implement GHS for this sector?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
<i>If yes, please provide the following details. If no, no further answers are required for this sector.</i>	
Lead Government Agency	
Contact person	
Phone number	
E-mail address	
Website	
When do you plan to implement GHS for this sector?	
How long is the phase in period and what are the transition arrangements?	
Are the main relevant legislations finalized?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
Do you intend to adopt all hazard classification building blocks of GHS as is written in the purple book?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please describe the building blocks that will be adopted.	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or “deemed-to comply” provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS	

implementation?
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
<i>Industry to complete</i>
Has it been easy to access all necessary information for compliance?
<p>The U.S. EPA has not yet implemented the GHS for agricultural chemicals. The GHS information on the U.S. EPA website and in EPA presentations has been informative but has not been updated recently. As EPA starts to incorporate GHS elements into their various regulations, it should be clear to stakeholders when EPA is aligning with OSHA HazCom 2012/GHS and when the EPA requirements deviate from OSHA/GHS, e.g., the proposed updates and revisions to the worker protection regulation for pesticides, e.g., the SDS.</p> <p>After OSHA published their final GHS Rule, the EPA published a timely Pesticide Registration Notice to aid in explaining the potential differences in pesticide and industrial sector labeling.</p> <p>Although the main OSHA HazCom 2012 implementation date is only weeks away, EPA has not published any information about revising their EPCRA/SARA 311/312 Tier I/Tier II (40 CFR 370.66) reporting requirements to align with the new OSHA HazCom 2012 hazards.</p> <p>Global Issues:</p> <p>It is not always possible to keep up to date and find the necessary GHS compliance information from some APEC economies. Also, it is not always easy to understand which sectors are covered by the implementing regulations/legislation/standards. Some countries/economies have limited access to regulations, information and/or websites to domestic companies only. This is contrary to the objectives of the GHS.</p> <p>Even when the regulations/legislation/standards are available, all of the information that is required for compliance is not always specified. For example, the GHS includes several options for mixture cut-off values and some countries include all options without specifying which is appropriate for compliance.</p> <p>Sometimes implementation dates are published, but the related implementing regulations are not yet finalized, or the regulations are finalized but the transition period and implementation dates are not clear. Only the EU CLP has a clear schedule for implementing updates to the GHS via their ATP process.</p> <p>In the case of pesticides, the FAO and WHO pesticide publications should be readily available on-line.</p>
Do you see any specific issues that are limiting the progress of GHS implementation?
<ul style="list-style-type: none"> • GHS implementation for the labelling of agricultural pesticides is still at an early stage world-wide. For pesticides, the inclusion of GHS information in the <i>FAO Guidelines on Good Labelling Practice for Pesticides</i>, the <i>FAO Guidelines on Pesticide Registration</i> and <i>WHO Recommended Classification of Pesticides</i> publication is a consideration for GHS implementation. The use of risk-based labeling could also be an implementation issue. • To achieve the goal of harmonization and reap the associated benefits, governments should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries. • Collaboration is needed among Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the GHS final rule. However, EPA and CPSC are not making progress in implementing the GHS. Although CPSC finalized a revised definition of strong sensitizer, CPSC has stated that GHS implementation is on hold due to other priorities. Non-harmonized issues like HNOCs and combustible dusts add to the cost of doing business internationally. • As EPA incorporates elements of the GHS into their various regulations ["Protection in the Workplace" (40 CFR 721.63), "Hazard Communication Program" (40 CFR 721.72) and

“Agricultural Worker Protection Standard” (40 CFR Part 170)], they should align with OSHA HazCom 2012/GHS as closely as possible, e.g., criteria, definitions, classification, SDS, etc. In EPA’s proposed worker protection rule requiring SDSs, the SDSs should have the same classifications, format and information as OSHA HCS 2012 SDSs.

- EPA needs to align their EPCRA/SARA 311/312 Tier I/Tier II (40 CFR 370.66) reporting requirements with the new OSHA HazCom 2012 hazards.

What are the expected costs for industry in the implementation of GHS?

It is expected that initial implementation costs for industry will be significant. If harmonization is achieved, then cost savings can be realized in the future.

Costs for industry can be reduced by the following:

- To achieve the goal of harmonization and reap the associated benefits, governments should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries.
- Manufacturers should be allowed to use their own precautionary statements in addition to the precautionary statements in the GHS, which should be non-binding suggestions.
- FAO/WHO information on pesticides that is aligned with the GHS should be developed.

What are the expected benefits for industry through the implementation of GHS?

Expected benefits for industry through the implementation of GHS include:

- Internationally harmonized hazard classification and communication will lead to increased protection, especially as the new hazard pictograms become recognized.
- Standardization will improve training and understanding of hazards.
- Consistent information will improve downstream hazard assessment activities.

The below activities are needed to reduce the potential risks of not achieving benefits:

- Benefits will accrue if the GHS is implemented comprehensively and consistently across industries on a global basis.
- Governments should work together to ensure alignment to the UN endorsed version of the GHS and to minimize country-specific deviations.
- Manufacturers should be allowed to use their own precautionary statements in addition to the precautionary statements in the GHS, which should be non-binding suggestions.
- FAO/WHO needs to develop information on pesticides that is aligned with the GHS.

The differences in GHS mixture classification cutoff values/thresholds between countries are an impediment to harmonization. It might be useful to convene a working group to look at the possibility of providing harmonized GHS mixture classification cutoff values/thresholds. Different interpretations of how to apply the GHS classification criteria to UVCBs are a potential impediment to harmonization.

Transport

Regulator to complete	
Do you intend to implement GHS for this sector (based on the UN "Purple book"), or implement Dangerous Goods transport regulations based on the UN "Orange Book" or not at all? (Please tick one of the following three boxes)	
<input type="checkbox"/> Implement Dangerous Goods (DG) transport regulations based on the UN "Orange Book"	
<input type="checkbox"/> Implement GHS based on the UN "Purple Book"	
<input type="checkbox"/> No, do not intend to implement GHS	
<i>If implementing DG transport regulations based on the UN "Orange Book", please complete Section 1 and 2. If implementing GHS based on the UN "Purple Book" please complete Section 1 and 3. If not implementing either, no further answers are required for this sector.</i>	
Section 1	
Please fill out the following details of the government agency responsible for the transport of chemicals	
Lead Government Agency	
Contact person	
Phone number	
E-mail address	
Website	
Only	
Section 2	
Do you currently have regulations based on the UN "Orange Book" in operation in your economy?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, is this transport sector regulation compatible with GHS? Please explain how the interface between GHS and UN "Orange Book" based regulation works. If no, please provide the details of the implementation plan. Please provide links to relevant legislation, draft legislation and/or other regulatory information.	
Section 3	
When do you plan to implement GHS for this sector?	
How long is the phase in period and what are the transition arrangements?	
Are the main relevant legislations finalized?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
Do you intend to adopt all hazard classification building blocks GHS as is written in the purple book?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please describe the building blocks that will be adopted.	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	

Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or “deemed-to comply” provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
Industry to complete	
Has it been easy to access all necessary information for compliance?	
<p>U.S. DOT has implemented the GHS through the 18th Revised Edition of the UN Model Regulations, Amendment 37–14 to the IMDG Code and the 2015-2016 ICAO Technical Instructions.</p> <p>There have been no issues accessing the necessary compliance information from the U.S. DOT. U.S. DOT routinely holds stakeholder meetings prior to the UNSCETDG meetings in Geneva to obtain stakeholder input. DOT routinely amends 49 CFR/Hazardous Materials Regulations to incorporate on-going updates of the UN Model Regulations and the modal requirements of the IMDG Code and ICAO Technical Instructions.</p> <p>U.S. Coast Guard / IMO SDS</p> <p>On April 9, 2012, the Coast Guard published a NPRM which creates a new requirement to specifically require SDSs for cargoes on ships. The format of this NPRM SDS example is inconsistent with the UN’s GHS framework, inconsistent with OSHA’s adoption of the GHS in HCS-2012, and based on GHS Rev-2.</p> <p>Information regarding the implementation of the IMO “Recommendations for Material Safety Data Sheets (MSDS) for MARPOL Annex I Oil Cargo and Oil Fuel” (Resolution MSC.286(86)) has not been readily available from the U.S. Coast Guard. Also the information on how the IMO SDS resolution is being implemented globally is not readily available.</p>	
Do you see any specific issues that are limiting the progress of GHS implementation / transport regulation?	
<ul style="list-style-type: none"> • To achieve the goal of harmonization and reap the associated benefits, governments/organizations should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries/organizations. • Collaboration is needed among Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the final GHS rule. However, EPA and CPSC are not making progress in implementing the GHS. Although CPSC finalized a revised definition of strong sensitizer, CPSC has stated that GHS implementation is on hold due to other priorities. • The International Maritime Organization (IMO)/Coast Guard activities related to SDSs do not 	

promote global harmonization and a consistent SDS format. The inconsistent SDS formats for OSHA HazCom 2012, the UN GHS and the proposed recommended Coast Guard SDS format do not promote harmonization.

U.S. Coast Guard / IMO SDS

Lack of agreement by the IMO and UNSCEGHS about the IMO SDS and how to harmonize IMO Resolution MSC.286(86) with the GHS SDS format is limiting progress.

What are the expected costs for industry in the implementation of GHS / transport regulations?

U.S. Coast Guard / IMO SDS

It would be a benefit to industry (and governments) to have the UNSCEGHS and IMO, two UN bodies, agree on a single SDS format. Industry would then avoid having to develop two similar but slightly different SDSs for the same product.

What are the expected benefits for industry through the implementation of GHS / transport regulations?

U.S. DOT harmonizes with the international transport regulations, but allows local exceptions as appropriate. This pragmatic approach has been used by U.S. DOT for many years and allows for global harmonization while recognizing local issues and considerations.

U.S. Coast Guard / IMO SDS

It was anticipated that under the GHS there would be a single SDS format, which would be a benefit and cost savings for industry. There is a risk that a single SDS format will not be recognized by IMO.