

Progress on the Implementation of GHS in APEC Economies
APEC Chemical Dialogue Virtual Working Group on GHS
September 2011

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 subsequently developed the GHS Implementation Reporting Template to be used for regular reporting of GHS implementation progress. Input is expected from both the 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 limited access to data for classification purposes.

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.

At the 8th CD meeting in Singapore in 2009, CD Members provided comments for the improvement of the GHS Implementation Progress Reporting Template. These comments were incorporated in the 2010 GHS Implementation Progress Reporting Template. APEC CD Members were encouraged to complete the 2010 GHS Implementation Progress Reporting Template in the hope that the information will help to identify and prioritize future work for the APEC CD and the Virtual Working Group to aid GHS implementation in the region.

The work of the United Nations Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (UNSCEGHS) continues. At the December 2010 meeting of the UNSCEGHS, the Committee considered a range of issues not yet addressed by the GHS.¹ The just released 4th edition of the UN GHS is a reminder that GHS is still a moving target. The lack of consistent GHS requirements worldwide manifests itself in adoption of different versions of GHS, which is published every 2 years. Some countries now adopt GHS 2nd version, some are adopting 3rd version already. This inevitably causes confusion and adds extra

¹ Issues yet to be addressed by the GHS, include new test method for chemical instability of gases, simple asphyxiants and labelling of small packages; refinement of existing classification and communication elements for gases under pressure and for supply and use of aerosols.

compliance costs to companies, especially those that supply chemicals to many countries. Trade partners need to work together to implement harmonized or compatible versions of GHS, and consider methods to keep up to date with the GHS updates every biennium, to achieve the foreshadowed benefits of GHS.

More than one economy observed that as more countries adopt GHS, less time and cost will need to be dedicated to customize the labelling and safety data sheets according to the requirements of the importing country. However, the expected GHS benefit threshold will remain elusive until the major trading partners of the APEC countries, i.e. US and EU, fully adopt GHS.

PROGRESS REPORT

Seven APEC CD Member Economies - Australia, Chile, Chinese Taipei, Hong Kong, China, Japan, Malaysia and Russia - have returned the 2010 GHS Implementation Progress Reporting Template to the Virtual Working Group on GHS. The American Chemistry Council (ACC) provided comments relevant to its industry sectors.

INDUSTRIAL WORKPLACE Sector appears to be the focal point for implementation of GHS, and the seven reporting economies have indicated Industrial Workplace sector as most likely to implement GHS first. In the case of Hong Kong, China, and Japan, Industrial Workplace is the only sector that will implement GHS.

For this sector, facilitation of international trade was identified as the main benefit from GHS implementation, with some economies also identifying improved workers' health. The main concern for this sector appears to be the discrepancies between economies implementation of GHS. While GHS allows certain choices within the constraints of GHS by the competent authorities, quite divergent versions of GHS are being implemented globally. This is due not only to making different choices on the details of GHS, but also to carrying over non-GHS elements from old legislation. This is a threat to achieving the identified benefit of international trade facilitation.

Industrial Workplace sector identified the following challenges for GHS implementation:

1. Lack of clear and practical information for regulatory compliance
2. Broad international implementation schedule
3. Differences in adoption of building blocks among economies and trading partners
4. Contradiction of GHS with other local chemical regulations resulting in longer time than expected for local implementation of GHS
5. Training and expertise: Lack of experts (toxicology, biology, physical properties) to classify chemicals per GHS; lack of experts who are competent to conduct GHS training or courses; level of commitment by industry in acquiring the necessary expertise in GHS; capability of local laboratories to conduct tests that may be needed to classify chemicals
6. Potentially high cost of implementation compared to expected benefits

Industrial Workplace sector made suggestions to address some GHS implementation issues:

1. Each economy to publish a clearly articulated GHS implementation plan
2. Allow lengthy and flexible transition timeframe. Example: Malaysia can accept both existing CLP and GHS-SDS versions concurrently until GHS fully implemented in Malaysia.
3. Adopt only GHS hazards, and refrain from adopting non-GHS hazard classifications
4. Conduct comparison of GHS classification lists from APAC economies (New Zealand, Japan, Chinese Taipei, Korea, China, et al) as well as trading partners (e.g., EU).

5. Provide standardized training and education campaigns for authorities and industry. .
6. Do cost analysis for GHS implementation by industry to be considered by authorities when adopting GHS elements, and in implementation timelines and transitions.

CONSUMER:

Most APEC economies have faced difficulties when considering GHS implementation for consumer products. Lack of international effort for harmonization has been identified as a key issue. A practical example is the difficulty to label packages (especially small containers) in multiple languages to simplify trade. Within the APEC economies, the definition of “small container” varies from 100 ml to 1000 ml.

Several APEC economies do not have comprehensive policies or regulations for consumer products. Other economies do not have regulations to distinguish between consumer and industrial chemical products. Even when consumer legislation exists, approach to GHS varies.

Australia has indicated that for consumer products, it will adopt certain elements of GHS, such as the GHS classification (but not all building blocks), and some labelling elements. However, Australia has also indicated that it would be preferable to work within its existing regulatory framework and adapt GHS to fit the framework.

Japan has indicated that adoption of GHS consumer products will be voluntary, relying on industry Code of Practice. The Japanese Government does not intend to implement GHS for consumer products as a mandatory requirement. A guidance document for GHS risk-based labelling has been prepared and is available on-line.

Russia indicated that there has been no decision yet, but the risk-based labelling approach in their current risk assessment framework has the capacity to incorporate elements of the GHS.

Unlike the Industrial Workplace sector, the consumer sector appears unable to clearly identify benefits from GHS implementation. This may explain the reported difficulties in formulating policies for GHS implementation for this sector. Another factor identified that may be impacting on the implementation of GHS for consumer products is the lack of participation by non-government organizations.

These divergent methods may however still deliver benefits for economies if some level of harmonization can be reached between close trading partners.

AGRICULTURE:

Similar to the Consumer Products sector, the GHS implementation for the Agricultural sector also appears uncertain. Economies indicated that a) they will not adopt GHS for the sector, b) the decision has not yet been made to implement GHS, or c) the decision has been taken but there are no details available on how and when the implementation will occur.

The implementation of GHS in the Agricultural sector appears to be awaiting the latest version of "FAO/WHO Guidelines on Good Labeling Practice for Pesticide" which are currently being updated by FAO/WHO to incorporate GHS elements. Malaysia noted that the amendment to their Pesticide (Labelling) Regulation under the Pesticides Act 1974 will be made based on recommendations of the latest version of FAO/WHO Guidelines.

TRANSPORT:

The Transport sector regulations in most economies appear to be based on the *United Nations Recommendation on the Transport of Dangerous Goods* (UNRTDG, or the “Orange Book”).

There are some similarities between the pictograms used by the Orange Book and the Purple Book, although there are a number of important differences. The work at the UN level to improve harmonization of criteria and classification cut-off limits between the Orange Book and the UN GHS (the “Purple Book”) will continue to improve the interface between transport regulations with GHS-based regulations in those economies that are planning to adopt GHS.

Australia, Chinese Taipei and Japan have transport sector regulations based on the UNRTDG. Russia indicated that their transport legislation is based on an older version of the UN “Orange Book.” This is true in several APEC economies so transport regulations must be updated as well as align with GHS.

Chile indicated that they currently use the Orange Book for the transport sector regulations, and that the Purple Book may be integrated into the transport regulations.

Hong Kong, China will base their requirements for transport classification and labelling on the IMDG Code, which is based on the Orange Book.

RECOMMENDATIONS FOR FUTURE REPORTING

The Virtual Working Group urges all APEC CD Members to complete and return the GHS Implementation progress template to the Virtual Working Group. Increased number of responding economies will aid in identification of common issues and potential future work by the APEC CD to benefit all APEC CD Economies.

The Virtual Working Group requests that where the APEC Economy has previously provided input and has no further comments to add, to contact the Virtual Working Group so that the information from 2008/09 report can be carried forward.

2010 GHS Implementation Progress Reporting Template

Introduction

This template has been designed to provide a practical insight into the progress of GHS implementation in each APEC member economy. It builds on the ideas and information from Annexes 1 and 2 of the Report of the Virtual Working Group on GHS Implementation “*Developing Clarity and Consistency in the Implementation of the Globally Harmonized System for the Classification and Labelling of Chemicals (GHS)*” endorsed at the 7th Chemical Dialogue meeting at Peru in May 2008. This report is intended to complement the UN GHS reporting.

The intent of this template is to identify the progress of GHS implementation in each member economy and each sector, and to identify sector specific and cross-sectoral implementation issues that may be of interest and/or concern to other economies and industry. Once identified, these issues may be addressed through further discussion between member economies, with the assistance of the Chemical Dialogue or referred to the United Nations Sub-Committee of Experts on the Globally Harmonized System of classification and labelling of chemical products (UNSCEGHS).

In 2009, nine out of 21 member economies of the APEC Chemical Dialogue (CD) completed the GHS Implementation Progress Reporting Template (Template). This process not only provided invaluable information regarding the progress of GHS implementation in these economies, but the participating member economies also reported that the process of completing the Template enabled articulation of implementation issues for further discussion.

APEC CD agreed that the Template should be completed by APEC member economies at regular intervals to provide the opportunity for economies to share the GHS implementation workload and draw on the experiences of others in the implementation of the GHS. Regular reporting will also provide opportunities for industry to work more closely with economies to progress the development of the GHS and identify implementation issues of concern at a practical level.

In order to achieve these objectives, the template is divided into a general section, industrial sector, consumer goods, agricultural chemicals and transport. Detailed and specific answers should be provided for each of the questions. Where a reference is made to documents, information on how to access these documents should follow.

Please answer all sections, even if your economy has a single set of regulations and a single regulatory body working on GHS implementation. This will help to identify any differences in approaches adopted by the different economies.

If you require any assistance on filling out the template, please contact the Catherine Oh of the Virtual Working Group on GHS at coh@accord.asn.au.

General

Please provide the Economy for which this Template is completed below.	
Australia	
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 checked="" type="checkbox"/> Yes Australia coordinates GHS implementation through an Australian Government interdepartmental committee facilitated by input from a UN Sub-Committee on GHS delegation lead by the workplace health and safety portfolio. The environment portfolio is the focal point for GHS reporting to the APEC Chemical Dialogue.	<input type="checkbox"/> No
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Safe Work Australia
Name	
Phone number	+61 2 6121 5317
E-mail address	info@safeworkaustralia.gov.au
Website	www.safeworkaustralia.gov.au
Do you have a hazard classification database?	
<input checked="" type="checkbox"/> Yes – For workplace chemicals.	<input type="checkbox"/> No
If yes, is it mandatory classification, or for information only? How do you access the database?	
Once GHS is implemented through workplace regulations, the database is expected to be for information only.	

Industrial Workplace

Regulator to complete			
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 the Industrial Workplace section.</i>			
Lead Government Agency	Safe Work Australia		
Contact person	Mr Martin Merrett		
Phone number	+61 2 6240 6960		
E-mail address	martin.merrett@safeworkaustralia.gov.au		
Website	www.safeworkaustralia.gov.au		
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?			
<input checked="" type="checkbox"/> Drafted	<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?			
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.			
Transition – What is the timing for the transition in this sector?			
Begin	2012	End	2017
What arrangements will be made available for business in this phase?			
There will be an overall compliance period for businesses with the new legislation and transitional periods catered for changes to classification, labeling and safety data sheets.			
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?			
<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No	
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list the building blocks that will be adopted.			
All except, Flammable gas Cat2, Flammable liquid Cat4, Acute toxicity –ora, dermal, inhalation Cat 5; Serious eye damage –Cat 2B; aspiration hazard-Cat 2; environmental hazard classifications (for guidance only).			
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.			
<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No	
If yes, please provide full details of non-GHS criteria being considered for adoption.			
C1 combustible liquid, which is any liquid other than a flammable liquid, with a flash point of 150°C or less and a fire point less than its boiling point.			
Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?			
No, workplace legislation requires a hazard-based label. Risk assessment is an additional duty required in workplaces handling the chemicals. Separate legislation governs government risk assessment of agricultural chemicals.			
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>			

Pictograms	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max none
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max none
Signal words	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max none
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max none
Hazard statements	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max none
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max none
Precautionary statements	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max none
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max none
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
<p>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. All precautionary statements relevant are required on the label, unless there are duplicates.</p> <p><i>N.B there is current activity at UNSCEGHS to rationalise and prioritise precautionary statements, which are a particular problem where multiple languages must be accommodated on a label.</i></p> <p>Other information (eg. Risk-based advice for pesticides) may be present on the label in addition to workplace GHS requirements.</p>				
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?				
Deemed-to comply provisions	<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No Only GHS-complaint labels or anything ADDITIONAL on label.	
Accept additional criteria	<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No	
Other arrangements <i>Please provide a full description</i>				
Do you have training and awareness activities planned? If yes, please provide some information.				
<p>OHS jurisdictional regulators and industry will need to develop and carry out training and awareness activities for inspectors, other regulatory staff and industry during the regulatory implementation period. UNITAR has developed an expert training course which will be available for Australian use.</p>				
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?				
No.				
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.				
<p>Accommodating differing perspectives on chemical safety issues between industry, regulatory authorities and the general community.</p>				
Industry to complete				
Has it been easy to access all necessary information for compliance?				
<p>The GHS has not yet been implemented in this sector. Industry has provided input to draft documents but the take-up of industry recommendations will not be evident until a detailed public consultation on Australian proposals is undertaken – expected to commence in late 2010 or early 2011.</p>				

Do you see any specific issues that are limiting the progress of GHS implementation?
The key timing challenges relate to finalization of model regulations and enactment by Australia's 6 States and 2 Territories
Please provide detail of the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)
<p>Australia's GHS implementation in this sector is proposed to commence in 2012 with a 5 year transition for classification and labelling. These timeframes are acceptable to industry.</p> <p>There had not yet been detailed dialogue between governments and industry on training but this matter is gaining in urgency. Training involves not only company personnel but the entire workforce who use workplace industrial chemicals.</p>
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?
<p>Industry has long supported the implementation of the GHS in the workplace industrial chemicals sector. However, Industry has continued to express concerns in the following areas:</p> <ul style="list-style-type: none"> • Inclusion of non-GHS elements in Australia's proposed implementation of the GHS (e.g. C1 Combustible Liquid category and 12 non-GHS supplemental hazard statements) may work against trade facilitation and add to costs of classification and labelling. Industry contends that the UNSCEGHS is the appropriate forum for changes to the GHS to be considered and agreed. • In Australia agricultural and veterinary products have a higher level of regulatory intervention through pre-market registrations and approvals. This system provides for risk-assessment of these 'defined-use' products (it is illegal to use these products for purposes contrary to label directions). Industry contends that mixing hazard and risk-assessed elements may not provide consistent messages to product end-users. Industry has recommended that labels for these products should continue to provide the outcomes of the expert and detailed risk assessment. See separate entry in this survey under "Agriculture".
How can governments best help industry with the implementation of GHS?
<p>General</p> <ul style="list-style-type: none"> • Avoid inclusion of non-GHS elements • Provide 'deemed to comply' provisions to account for variations with trading partners – this is crucial in supporting the GHS trade facilitation objective • Facilitate standardized training packages <p>Trade facilitation during international transition to GHS</p> <ul style="list-style-type: none"> • Some Australian States (e.g. Queensland, New South Wales, and Victoria) implemented changes to regulations during 2010 that provide for GHS classified and labeled products in workplaces prior to the full proposed adoption of GHS in 2012. This approach is helpful and supports trade facilitation.

Consumer Products

Regulator to complete	
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 the Consumer Products Section.</i>	
Lead Government Agency	Australian Department of Health and Ageing (Office of Chemical Safety and Environmental Health) with effect through the national poisons scheduling framework. Scheduling may apply to all chemical substances irrespective of end-use and includes veterinary, agricultural, domestic and industrial chemicals where there is a potential risk to public health and safety. Poisons are scheduled according to the degree of risk and the level of control required over availability to protect consumers.
Contact person	Greg Hooper
Phone number	+61 2 6289 2558
E-mail address	greg.hooper@health.gov.au
Website	http://www.tga.gov.au/ndpsc/index.htm
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?	
<input type="checkbox"/> Drafting	<input type="checkbox"/> Bills Passed
<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?	
Existing State/Territory Poisons Acts for poisons scheduling (health related classification and labelling) should provide a suitable basis. Contacts for information and advice on legislative requirements can be found at http://www.tga.gov.au/ndpsc/stdpu.htm . The Therapeutic Goods Act, 1989 and Regulations (Commonwealth) also define poisons scheduling arrangements. The Act can be found via http://www.tga.gov.au/ndpsc/index.htm. Environmental elements may require a legislative basis.	
Transition – What is the timing for the transition in this sector?	
Begin _____	End _____
What arrangements will be made available for business in this phase?	
Not yet determined but extensive stakeholder consultation will be undertaken and an implementation plan developed.	
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?	
<input checked="" type="checkbox"/> Yes – most likely	<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 list the building blocks that will be adopted.	
These remain 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 °C.	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No – to be determined
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?				
<p>Risk assessment will be overlaid on top of GHS classification. The Poisons Scheduling system defines under the Therapeutic Goods Act, a range of factors that must be considered in addition to toxicological factors. 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.</p>				
<p>Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write “none” next to “Max” in the appropriate column.</i></p>				
Pictograms	Label	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max N/A
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max Not defined
Signal words	Label	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max 1 – ie that is defined by the poisons scheduling laws and not GHS (but which are similar)
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max 1
Hazard statements	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max Not yet determined
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max Not yet determined
Precautionary statements	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max As necessary
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max As necessary
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
<p>Pictograms are not favored by Health authorities. The hierarchy of hazard statements not yet finalised. Precautionary statements to be added as necessary.</p>				
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?				
Deemed-to-comply provisions	<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No	
Accept additional criteria	<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No	
Other arrangements Please provide a full description				
Do you have training and awareness activities planned? If yes, please provide some information.				
<p>Not as yet but may be initiated prior to implementation.</p>				
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?				
<p>Exchange of personnel is not anticipated.</p>				
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 labeling are in place.

Industry to complete

Has it been easy to access all necessary information for 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.

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

Yes. There are on-going negotiations between the government departments responsible for consumer products regulations and workplace chemicals regulations over the regulation of consumer product labels when they are used in a place of work. The questions range from warehousing/storage of consumer products to disposal of packaging (workers at the disposal sites).

Industry supports consumer products labelling on all consumer products in their retail packaging, whether they are used in a place of work or in households, warehoused or packages going through the waste disposal sites.

Please detail the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)

The work that will be required by the consumer products sector will depend largely on the outcomes from the negotiation between the workplace chemicals regulator and the consumer products regulator (Department of health and Ageing).

If consumer products are required to be labelled to meet the workplace chemicals requirements for warehousing and disposal as well as potential use in a place of work, while also meeting the consumer products labelling requirement, then industry will be required to re-classify and re-label all consumer products.

If however only consumer product labelling is required on consumer products, then the changes required are expected to be smaller scale.

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.

What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?

Very little benefit is expected through the implementation of GHS. Australian consumer products 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. It is generally expected that upstream chemicals internationally will be classified to GHS.

How can governments best help industry with the implementation of GHS?

Long transition period and consistent and transparent communication on the new requirements from governments as they are developed is essential for industry preparations for implementation of GHS.

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Agriculture

Regulator to complete	
Do you intend to implement GHS for this sector?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>No decision has been made yet on implementing the GHS for pesticides. Implementation will depend on the implementation timetables of our major trading partners and the outcomes of considerations by other national regulatory reforms, such as those within the Department of Health and Ageing and States as noted above under 'consumer products'.</p>	
Lead Government Agency	Australian Department of Agriculture, Fisheries and Forestry (DAFF)
Contact person	Mr Bill Turner
Phone number	+61 2 6272 3210
E-mail address	bill.tuner@daff.gov.au
Website	http://www.daff.gov.au/
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?	
<input type="checkbox"/> Drafted	<input type="checkbox"/> Bills Passed
<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?	
<p>No decision yet on whether to implement GHS for this sector.</p>	
Transition – What is the timing for the transition in this sector?	
Begin _____	End _____
What arrangements will be made available for business in this phase?	
<p>No decision yet on whether to implement GHS for this sector but, if implemented, a transition period will be needed – possibly 5 years.</p>	
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitisers. If no, please list the building blocks that will be adopted.	
<p>No decision yet on whether to implement GHS for this sector but, if implemented, the chronic categories may not be adopted. The final decision on this issue rests with the Australian health authorities.</p> <p>Classification criteria associated with poisons scheduling remains under consideration.</p>	
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.	
<p>Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?</p>	
<p>No decision yet. The risk-based labelling approach in the current risk assessment framework has the capacity to incorporate elements of the GHS.</p>	
Labeling – Will each of the following elements be used on the label and SDS and is there to be a	

maximum number of the following included on the SDS and the label?

If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.

Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max The use of pictograms remain under discussion.
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max The use of pictograms remain under discussion.
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max Unlikely to be limited if required.
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max Unlikely to be limited if required.
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max Unlikely to be limited if required.
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max Unlikely to be limited if required.

How is the hierarchy of pictograms, hazard statements and precautionary statements defined?

Not yet determined.

Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?

Deemed-to comply provisions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>	Imported chemicals will need to comply with Australian regulatory requirements. Imported chemical products would need to comply with state and territory poisons legislation including compliance with the Standard for the Uniform Scheduling of Drugs and Poisons (SUSDP).	

Do you have training and awareness activities planned? If yes, please provide some information.

If implemented, an education campaign may be required.

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

No.

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

Demonstration of the benefits of implementing GHS, particularly ahead of our major trading partners.

Industry to complete

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

A clear process for implementation of the GHS in the agricultural chemicals sector is yet to be determined. Industry is engaged with several Australian Government departments to negotiate the appropriate application of GHS standards to Australian agricultural chemical products.

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

Australian industry supports the continuation of existing regulatory scheme where hazard identification and characterization occur within a risk management framework for agricultural chemicals. The current regulatory scheme only permits the use of chemicals in Australia where pre-defined uses have had hazards assessed and risks managed according to the use pattern. This approach is superior to mere hazard identification and communication.

Key issues include:

- Continuing analysis of any potential risks and benefits associated with adoption of GHS label elements on an existing defined use, and risk-based label.
- Identifying clear boundaries in scope. Current workplace label proposals to implement the GHS have potentially unintended consequences for consumer chemicals that fall under the Australian agricultural chemicals regime.

The Australian Government has yet to make a decision regarding GHS implementation for agricultural chemicals.

Please provide detail of the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)

Should proposals for workplace labeling be adopted without the amendments sought, industry will be required to change all agricultural chemical labels to incorporate GHS-consistent label statements. Should a decision to implement GHS in the agricultural chemicals sector be taken, significant additional training of all chemical users will be required to enable them to understand and interpret the necessary differences between hazard-based label elements and risk-based use instructions. Irrespective of the timeframe adopted, implementation of changes will have significant cost implications for agricultural chemical registrants and users.

What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?

In Australia, relevant product hazards that have been identified and independently characterized and assessed by the agricultural chemicals regulator are already included on labels. Adding additional information that is not relevant to the formulated product or permissible uses is not expected to provide additional benefits. Further, additional hazard information that may be interpreted as conflicting with existing label use directions may have unintended or undesirable consequences resulting from users making poor product use choices when using agricultural chemical products.

As agricultural chemicals are not permitted to be used in ways other than that defined on the label, industry has argued that the GHS label elements should not apply to the risk assessed use of agricultural chemicals.

How can governments best help industry with the implementation of GHS?
Under current arrangements, users must comply with risk-based use directions currently identified on product labels. Governments can assist by ensuring that the integrity of current risk communication mechanisms are maintained, and additional hazard statements are only imposed when existing mechanisms are found to be inadequate.

Transport

Regulator to complete	
Do you intend to implement Dangerous Goods transport regulations based on the UN "Orange Book", or implement GHS for this sector (based on the UN "Purple book") or not at all? <i>Please tick one of the following three boxes</i>	
<input checked="" 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	States and territory governments are responsible for the land transport of dangerous goods in Australia. The National Transport Commission coordinates a national process to maintain and update the Australian Dangerous Goods (ADG) Code and its associated model legislation.
Contact person	
Phone number	
E-mail address	
Website	http://www.ntc.gov.au/
Section 2	
Do you currently have regulations based on the UN "Orange Book" in operation in your economy?	
<input checked="" 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.	
<p>The Australian Code for the transport of dangerous goods by road & rail and the associated model legislation are based on the United Nations Recommendations on the Transport of Dangerous Goods – Model Regulations. The regulations for air and sea transport of dangerous goods in Australia adopt the international air and sea transport codes for dangerous goods which are also based on the UN Model Regulations.</p> <p>These regulatory frameworks are compatible with the GHS through their adoption of the UN model regulations, given that the UN model regulations are aligned as far as possible with the provisions in the GHS and it has been agreed that any subsequent editions of the UN Model Regulations will continue to adopt all relevant GHS requirements.</p> <p>Accordingly, dangerous goods transport regulation in Australia effectively incorporate provisions from the GHS, via the UN Model Regulations, and will continue to do so in future revisions. This ensures a consistent approach to the GHS by all transport modes for the transport of dangerous goods.</p>	
Section 3	
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?	
<input type="checkbox"/> Drafted	<input type="checkbox"/> Bills Passed
<input type="checkbox"/> Proclaimed	If proclaimed, date
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?	

Transition – What is the timing for the transition in this sector?				
Begin _____		End _____		
What arrangements will be made available for business in this phase?				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list 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?				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write “none” next to “Max” in the appropriate column.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
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 (“deemed-to comply” provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?				
Deemed-to comply provisions	<input type="checkbox"/> Yes		<input type="checkbox"/> No	
Accept additional criteria	<input type="checkbox"/> Yes		<input type="checkbox"/> No	
Other arrangements <i>Please provide a full description</i>				
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?				

Some information, such as the *Australian Code for the Transport of Dangerous Goods by Road and Rail* (ADG Code) is easy to find. State and Territory based legislations implementing the ADG Code are more difficult to find.

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

Transport regulations in Australia have been based on UNRTDG for many years. We understand that the work at the UNRTDG and UN GHS will continue to align the classification cut-off and other issues arising to ensure that there is a smooth interface between transport of chemicals and use and storage of chemicals.

Please provide detail of the work required by industry to implement GHS / transport regulations, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)

Industry is not expecting increased workload for the transport sector from GHS implementation, since the transport regulations in Australia has been based on the UNRTDG for many years.

However, a single National transport regulation instead of several State and Territory based regulations, updated regularly to align with the UNRTDG updates would help industry comply with the Australian dangerous goods transport regulations, and also keep up to date with any changes made to the UNRTDG to align with the UN GHS.

Clearer separation between transport requirements and workplace chemical / consumer products / agricultural chemicals requirements would also be useful for understanding the labelling requirements for each sector. Currently, unlike UNRTDG, the ADG Code specifies that "inner packages" above a certain size, that are not be visible during transport be marked and labelled to meet transport requirements.

What are the expected benefits for industry through the implementation of GHS / transport regulations? Are there any risks that this benefit may not be achieved?

No new benefits are expected.

How can governments best help industry with the implementation of GHS / transport regulations?

Governments can provide information and training when transport regulations are updated, with specific focus on the changes and the expected benefits of those changes.

2010 GHS Implementation Progress Reporting Template

Introduction

This template has been designed to provide a practical insight into the progress of GHS implementation in each APEC member economy. It builds on the ideas and information from Annexes 1 and 2 of the Report of the Virtual Working Group on GHS Implementation “*Developing Clarity and Consistency in the Implementation of the Globally Harmonized System for the Classification and Labelling of Chemicals (GHS)*” endorsed at the 7th Chemical Dialogue meeting at Peru in May 2008. This report is intended to complement the UN GHS reporting.

The intent of this template is to identify the progress of GHS implementation in each member economy and each sector, and to identify sector specific and cross-sectoral implementation issues that may be of interest and/or concern to other economies and industry. Once identified, these issues may be addressed through further discussion between member economies, with the assistance of the Chemical Dialogue or referred to the United Nations Sub-Committee of Experts on the Globally Harmonized System of classification and labelling of chemical products (UNSCEGHS).

In 2009, nine out of 21 member economies of the APEC Chemical Dialogue (CD) completed the GHS Implementation Progress Reporting Template (Template). This process not only provided invaluable information regarding the progress of GHS implementation in these economies, but the participating member economies also reported that the process of completing the Template enabled articulation of implementation issues for further discussion.

APEC CD agreed that the Template should be completed by APEC member economies at regular intervals to provide the opportunity for economies to share the GHS implementation workload and draw on the experiences of others in the implementation of the GHS. Regular reporting will also provide opportunities for industry to work more closely with economies to progress the development of the GHS and identify implementation issues of concern at a practical level.

In order to achieve these objectives, the template is divided into a general section, industrial sector, consumer goods, agricultural chemicals and transport. Detailed and specific answers should be provided for each of the questions. Where a reference is made to documents, information on how to access these documents should follow.

Please answer all sections, even if your economy has a single set of regulations and a single regulatory body working on GHS implementation. This will help to identify any differences in approaches adopted by the different economies.

If you require any assistance on filling out the template, please contact the Catherine Oh of the Virtual Working Group on GHS at coh@accord.asn.au.

General

Please provide the Economy for which this Template is completed below.	
CHILE	
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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Ministry of Health
Name	Ms. Pamela Santibañez
Phone number	(56 2) 5740791
E-mail address	psantibanez@minsal.cl
Website	www.minsal.cl
Do you have a hazard classification database?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, is it mandatory classification, or for information only? How do you access the database?	
It is used the United Nations classification and it is mandatory for transport and from March 2011 it will be for warehousing	

Industrial Workplace

Regulator to complete				
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 the Industrial Workplace section.</i>				
Lead Government Agency	Ministry of Health			
Contact person	Ms. Pamela Santibañez			
Phone number	(56 2) 5740791			
E-mail address	psantibanez@minsal.cl			
Website	www.minsal.cl			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input checked="" type="checkbox"/> Drafted		<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
It is developing a National Implementation Strategy, which will include the industrial sector				
Transition – What is the timing for the transition in this sector?				
Begin _____		End _____		
What arrangements will be made available for business in this phase?				
Not defined yet				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list the building blocks that will be adopted.				
Not defined yet				
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.				
Not defined yet				
Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?				
Not defined yet				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
Not defined yet				
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?				

Deemed-to comply provisions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>	Not defined yet	
Do you have training and awareness activities planned? If yes, please provide some information.		
For the year 2011, it is planned to develop awareness activities of GHS, both public and private sector		
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?		
Not for now		
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.		
<ul style="list-style-type: none"> - Our Economy has spent several years trying to implement GHS, however this has not resulted (there is not any document how it will be implemented). For this reason, in this stage our main objective is developing an implementation strategy. - It has been difficult to get the participation of representatives organizations of civil society 		
Industry to complete		
Has it been easy to access all necessary information for compliance?		
There is no information from a regulatory point of view to comply with GHS, even though there is a starting work in progress, to participate in two projects that include funding for the implementation on GHS. Exporters to the following economies were prompt to implement GHS local implementations: 1) UE: Directive 1272, also known as CLP Directive 2) Korea: Standard for Classification, Labeling of Chemical Substance and Material Safety Data Sheet according the Industrial Safety & Health Act, 2008 3) Japan: JIZ Z 7250 (2005) Standard.		
Do you see any specific issues that are limiting the progress of GHS implementation?		
As far as we know, there are limited or no budget from the State to do so. Moreover, when funds would be considered, Chilean State will need to provide a special and intensive training process to the regulators, in those specifics subjects, essential for a successful implementation of the GHS. There are a few companies that have presented concern about probable impacts on the GHS implementation, due our current regulation (which covers UN recommendations on the transport of hazardous materials) is different in some aspects with GHS, so it might cause confusion on regulators or inspectors, with no proper training on the GHS labeling.		
Please provide detail of the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)		
The workload supposed to be very intensive, since a lot of areas need to be covered. From the classification point of view, there is a chance to have less workload since we do not expect to find big changes from the current UN system used for Transportation. Nevertheless because there are new divisions and risk to taking into account, this will take a lot of time to comply. Therefore, timing is essential to best implementing the GHS. Most challenges are expected from the labeling part, due the absence of a clear regulation on risk communication other than the used at the transport.		
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?		
Main benefit is the market access to those economies to have covered the GHS on their legislations. The main risk to not achieve this benefit, start when different approaches might create different regulations and conditions, in different countries. This condition itself, create a contradiction on the initiative to harmonize the criteria. Nevertheless there is a small impact expected in this area, due unequal opinions on risk assessment.		

How can governments best help industry with the implementation of GHS?

Creating a clear and yet achievable regulatory scenario, all industry must align their processes to get a uniform classification and risk communications systems. When formulating this regulations and laws it is fundamental to consult the industry representatives to create effective pieces of law that contribute with the GHS objectives. There is also important to consider a reasonable timeline and steps to implement, giving a fair space of time, to small size companies to comply. It also would help creating instruments to co-financing the implementation in small companies or group of them, using i.e.: a "Clean Production" approach. Finally it would be desirable, to consider similar regulations in the UE or other countries that has already implemented GHS, taking advantage of the variety of languages used at the UE including Spanish.

Consumer Products

Regulator to complete				
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 the Consumer Products Section.</i>				
Lead Government Agency	Ministry of Health			
Contact person	Ms. Pamela Santibañez			
Phone number	(56 2) 5740791			
E-mail address	psantibanez@minsal.cl			
Website	www.minsal.cl			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input type="checkbox"/> Drafting		<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
As part of the developing of the Implementation National Strategy, it will include the application to the consumer products, however this work is just began and it not defined how and who will implement it				
Transition – What is the timing for the transition in this sector?				
Begin _____		End _____		
What arrangements will be made available for business in this phase?				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per 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 list 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.				
Not defined yet				
Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?				
Not defined yet				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				

Not defined yet		
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?		
Deemed-to-comply provisions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Other arrangements Please provide a full description	Not defined yet	
Do you have training and awareness activities planned? If yes, please provide some information.		
For the year 2011, it is planned to develop awareness activities of GHS, both public and private sector		
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?		
Not for now		
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.		
<ul style="list-style-type: none"> - Our Economy has spent several years trying to implement GHS, however this has not resulted (there is not any document how it will be implemented). For this reason, in this stage our main objective is developing an implementation strategy. - It has been difficult to get the participation of representatives organizations of civil society 		
<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?		
Please detail the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)		
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?		
How can governments best help industry with the implementation of GHS?		

Agriculture

Regulator to complete				
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 the Industrial Workplace section.</i>				
Lead Government Agency	Agricultural and Livestock Service			
Contact person	Mr. Ignacio Figueroa			
Phone number	(56 2) 6950805			
E-mail address	ignacio.figueroa@sag.gob.cl			
Website	www.sag.cl			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input checked="" type="checkbox"/> Drafted		<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
It is developing a National Implementation Strategy, which will include the agricultural sector.				
Transition – What is the timing for the transition in this sector?				
Begin _____		End _____		
What arrangements will be made available for business in this phase?				
Not defined yet				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list the building blocks that will be adopted.				
Not defined yet				
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.				
Not defined yet				
Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?				
Not defined yet				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
Not defined yet				
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?				

Deemed-to comply provisions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>	Not defined yet	
Do you have training and awareness activities planned? If yes, please provide some information.		
For the year 2011, it is planned to develop awareness activities of GHS, both public and private sector		
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?		
Not for now		
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.		
<ul style="list-style-type: none"> - Our Economy has spent several years trying to implement GHS, however this has not resulted (there is not any document how it will be implemented). For this reason, in this stage our main objective is developing an implementation strategy. - It has been difficult to get the participation of representatives organizations of civil society 		
<i>Industry to complete</i>		
Has it been easy to access all necessary information for compliance?		
Pesticides, in accordance with existing regulation, must be registered prior putting the products on the market. In this process the industry must submit the data for supporting toxicological and ecotoxicological requirements required by the regulation.		
Do you see any specific issues that are limiting the progress of GHS implementation?		
We understand GHS uses FAO/WHO criteria for pesticides labeling		
Please provide detail of the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)		
We consider important develop joint training public and private sector, and the assimilation of FAO/WHO criteria about pesticides.		
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?		
We consider important and beneficial the implementation of information system to users		
How can governments best help industry with the implementation of GHS?		
We consider indispensable the phased implementation of the system in order to generate capacities for each of them facilitating the implementation		

Transport

Regulator to complete	
Do you intend to implement Dangerous Goods transport regulations based on the UN "Orange Book", or implement GHS for this sector (based on the UN "Purple book") or not at all? <i>Please tick one of the following three boxes</i>	
<input checked="" type="checkbox"/> Implement Dangerous Goods (DG) transport regulations based on the UN "Orange Book"	
<input checked="" 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	Ministry of Transport and Telecommunications, Transportation Undersecretary
Contact person	Mr. Víctor Carrasco Poblete
Phone number	(56 2) 4213422
E-mail address	vcarrasc@mtt.cl
Website	www.mtt.cl
Only	
Section 2	
Do you currently have regulations based on the UN "Orange Book" in operation in your economy?	
<input checked="" 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	
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?	
<input checked="" type="checkbox"/> Drafted <input type="checkbox"/> Bills Passed <input type="checkbox"/> Proclaimed If proclaimed, date _____	
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?	
Transition – What is the timing for the transition in this sector?	
Begin <u>2011</u>	End <u>2012</u>
What arrangements will be made available for business in this phase?	
Not defined yet	
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list the building blocks that will be adopted.	
Not defined yet	
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 overlaid on top of GHS classification on the label? If yes, how will it work?	

Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label?

If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.

Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____

How is the hierarchy of pictograms, hazard statements and precautionary statements defined?

Not defined yet

Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?

Deemed-to comply provisions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Accept additional criteria	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>		

Do you have training and awareness activities planned? If yes, please provide some information.

For the year 2011, it is planned to develop awareness activities on GHS in Transport sector

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

Not for now

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?

Our norms have been based on the UN Orange Book for risk communication and classification, at ground transport of Hazardous Materials. Nonetheless, our laws are still too basic to cover the risk on transportation of hazardous materials.

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

As far as we know, GHS will only apply to the labeling, but not to the packing for transport purpose. This means that packages for transport, and trucks tanks, will use the same pictograms that are used today. The main impact could be in classifications, depending on how the state chooses to apply the GHS.

Please provide detail of the work required by industry to implement GHS / transport regulations, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)

We believe that GHS implementation should not have important effects on hazardous materials transportation. In other words the UN Purple Book should not replace the Orange Book.

What are the expected benefits for industry through the implementation of GHS / transport regulations? Are there any risks that this benefit may not be achieved?

Improving regulations on transport will help the industry to compete on an even regulatory basis, because at that scenario, law will fix the minimum safety standard.

How can governments best help industry with the implementation of GHS / transport regulations?

We believe the transport regulations could be improved, by motivating self regulations and/or the implementation of management systems that covers those kinds of operations.

2010 GHS Implementation Progress Reporting Template

Introduction

This template has been designed to provide a practical insight into the progress of GHS implementation in each APEC member economy. It builds on the ideas and information from Annexes 1 and 2 of the Report of the Virtual Working Group on GHS Implementation “*Developing Clarity and Consistency in the Implementation of the Globally Harmonized System for the Classification and Labelling of Chemicals (GHS)*” endorsed at the 7th Chemical Dialogue meeting at Peru in May 2008. This report is intended to complement the UN GHS reporting.

The intent of this template is to identify the progress of GHS implementation in each member economy and each sector, and to identify sector specific and cross-sectoral implementation issues that may be of interest and/or concern to other economies and industry. Once identified, these issues may be addressed through further discussion between member economies, with the assistance of the Chemical Dialogue or referred to the United Nations Sub-Committee of Experts on the Globally Harmonized System of classification and labelling of chemical products (UNSCEGHS).

In 2009, nine out of 21 member economies of the APEC Chemical Dialogue (CD) completed the GHS Implementation Progress Reporting Template (Template). This process not only provided invaluable information regarding the progress of GHS implementation in these economies, but the participating member economies also reported that the process of completing the Template enabled articulation of implementation issues for further discussion.

APEC CD agreed that the Template should be completed by APEC member economies at regular intervals to provide the opportunity for economies to share the GHS implementation workload and draw on the experiences of others in the implementation of the GHS. Regular reporting will also provide opportunities for industry to work more closely with economies to progress the development of the GHS and identify implementation issues of concern at a practical level.

In order to achieve these objectives, the template is divided into a general section, industrial sector, consumer goods, agricultural chemicals and transport. Detailed and specific answers should be provided for each of the questions. Where a reference is made to documents, information on how to access these documents should follow.

Please answer all sections, even if your economy has a single set of regulations and a single regulatory body working on GHS implementation. This will help to identify any differences in approaches adopted by the different economies.

If you require any assistance on filling out the template, please contact the Catherine Oh of the Virtual Working Group on GHS at coh@accord.asn.au.

General

Please provide the Economy for which this Template is completed below.	
Chinese Taipei	
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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, where can it be found? Please list websites, attach documents, etc.	
See scheme of National GHS Implementation 3-year Action (FY2006-FY2008) attached and website (http://ghs.cla.gov.tw/) for details. <ul style="list-style-type: none"> ● National Standard CNS 15030 (2008): Classification and Labelling of Chemicals ● National Standard CNS 6864 (2006): Labels for the Transport of Dangerous Goods 	
Do you have a GHS coordinator to facilitate implementation discussions within your economy?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Safety and Health Technology Center (SAHTECH)/Council of Labour Affairs (CLA), Executive Yuan (National GHS Implementation Lead Agency)
Name	Dr. Jowitt Li
Phone number	+886-6-2937770
E-mail address	joli@sahtech.org
Website	http://www.cla.gov.tw/
Do you have a hazard classification database?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, is it mandatory classification, or for information only? How do you access the database?	
Information only, (http://ghs.cla.gov.tw/)	

Industrial Workplace

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 the Industrial Workplace section.</i>				
Lead Government Agency	Council of Labour Affairs (CLA), Executive Yuan / Safety and Health Technology Center (SAHTECH)			
Contact person	Kuo-Ming CHANG / Dr. Jowitt Li			
Phone number	+886-2-85902775 / +886-6-2937770			
E-mail address	gorman@mail.cla.gov.tw / joli@sahtech.org			
Website	http://www.cla.gov.tw/			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input type="checkbox"/> Drafted		<input type="checkbox"/> Bills Passed	<input checked="" type="checkbox"/> Proclaimed	If proclaimed, date <u>10/19/2007</u>
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
Regulation of Labelling and Hazard Communication of Dangerous and Harmful Materials, http://www.cla.gov.tw/ , Kuo-Ming CHANG / Dr. Jowitt Li				
Transition – What is the timing for the transition in this sector?				
Begin <u>12/31/2008</u>		End <u>12/31/2009</u> (for the first stage of Implementation)		
What arrangements will be made available for business in this phase?				
Both GHS and UNRTDG formats are acceptable during the transition period.				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list the building blocks that will be adopted.				
All hazard categories and cut-off limits are included in the National Standard CNS 15030.				
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 overlaid on top of GHS classification on the label? If yes, how will it work?				
No.				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>				
Pictograms	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
Signal words	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
Hazard statements	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
Precautionary statements	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
Pictograms, hazard statements and precautionary statements are required for chemical container labelling specified in the Regulation of Labelling and Hazard Communication of Dangerous and Harmful Materials.				
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?				

Deemed-to comply provisions	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>		
Do you have training and awareness activities planned? If yes, please provide some information.		
<p>Yes, CLA has trained 276 instructors responsible for GHS awareness-raising and implementation in 2008. Additional 90+ official GHS seminars have been held in different cities/areas with more than 1,000 participants of industry EHS personals. By August 2010, more than 80,000 participants were involved in various awareness-raising activities. Copies of GHS pictogram posters, brochures, training materials, quarterly e-newsletters, and multi-media video clips are distributed to target audiences and companies. Official GHS website for awareness-raising materials and schedules (http://ghs.cla.gov.tw/).</p>		
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?		
In planning.		
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.		
<ul style="list-style-type: none"> ● International implementation schedule ● Discrepancies in building blocks approach among economics ● Discrepancies in classification results due to different references ● Scope of full implementation (lack of national chemical substance inventory, a national inventory is in the process of nomination and development) 		
Industry to complete		
Has it been easy to access all necessary information for compliance?		
Official GHS website (http://ghs.cla.gov.tw/), GHS Help Desk Service (+886-6-2937770)		
Do you see any specific issues that are limiting the progress of GHS implementation?		
<ul style="list-style-type: none"> ● Broad international implementation schedule ● Lack of international approach on building block approach 		
Please provide detail of the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)		
<ul style="list-style-type: none"> ● Prepare GHS format MSDS/labelling for specific chemical according to the Regulation of Labelling and Hazard Communication of Dangerous and Harmful Materials ● Designate a hazardous materials communication plan ● Prepare an inventory of hazardous materials ● Provide education and training to workers on the manufacturing, handling, or usage of hazardous materials 		
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?		
<ul style="list-style-type: none"> ● To improve protection of labors in workplace. ● International harmonized SDS and labelling elements to facilitate international trade. 		
How can Governments best help industry with the implementation of GHS?		
<ul style="list-style-type: none"> ● Provide 2,000+ GHS format MSDS/labelling examples ● Held 90+ official GHS seminars ● Published e-newsletter to update latest regulatory information and international implementation updates ● Provide phone, FAX and web-based consultation to industries 		

Consumer Products

Regulator to complete				
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 the Consumer Products Section.</i>				
Lead Government Agency	Ministry of Economic Affairs (MOEA)			
Contact person				
Phone number				
E-mail address				
Website				
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input checked="" type="checkbox"/> Drafting		<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
Transition – What is the timing for the transition in this sector?				
Begin _____		End _____		
What arrangements will be made available for business in this phase?				
No determined yet.				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
No determined yet.				
<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. sensitisers. If no, please list the building blocks that will be adopted.				
No determined yet.				
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.				
No determined yet.				
<input type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please provide full details of non-GHS criteria being considered for adoption.				
No determined yet.				
Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?				
No determined yet.				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column. No determined yet.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
No determined yet.				
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?				
No determined yet.				
Deemed-to-comply provisions		<input type="checkbox"/> Yes		<input type="checkbox"/> No

Accept additional criteria	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Other arrangements Please provide a full description		
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.		
To adopt hazard or risk based approach?		
<i>Industry to complete</i>		
Has it been easy to access all necessary information for compliance?		
No available yet.		
Do you see any specific issues that are limiting the progress of GHS implementation?		
International harmonization efforts are lacking in this sector.		
Please detail the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)		
No available yet.		
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?		
It could be a big uncertainty because international harmonization efforts are lacking in this sector.		
How can Governments best help industry with the implementation of GHS?		
To provide standards in line with international criteria.		

Agriculture

Regulator to complete				
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 the Industrial Workplace section.</i>				
Lead Government Agency	Council of Agriculture (COA), Executive Yuan			
Contact person				
Phone number				
E-mail address				
Website	http://pesticide.baphiq.gov.tw/ghs/ (Chinese only)			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input checked="" type="checkbox"/> Drafted		<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
Pending on FAO and WHO harmonization work.				
Transition – What is the timing for the transition in this sector?				
Begin _____		End _____		
What arrangements will be made available for business in this phase?				
Awareness raising and training courses				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitisers. If no, please list the building blocks that will be adopted.				
Not determined yet				
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.				
Not determined yet				
<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?				
Not determined yet				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label?				
<i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column. Pending on FAO and WHO harmonization work.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
FAO and WHO criteria				
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?				
Deemed-to comply provisions	<input type="checkbox"/> Yes		<input type="checkbox"/> No	
Accept additional criteria	<input type="checkbox"/> Yes		<input type="checkbox"/> No	
Other arrangements	<i>Please provide a full description</i>			

Do you have training and awareness activities planned? If yes, please provide some information.
In progress.
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?
No.
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
Pending on FAO and WHO harmonization work.
Industry to complete
Has it been easy to access all necessary information for compliance?
Yes
Do you see any specific issues that are limiting the progress of GHS implementation?
Pending on FAO and WHO harmonization work and adoption in local regulations
Please provide detail of the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)
Training courses based on new reg. and FAO/WHO criteria as possible.
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?
How can Governments best help industry with the implementation of GHS?
<ul style="list-style-type: none"> ● Provide 300+ GHS format MSDS examples or safety information ● Held 7 official GHS seminars ● Provide phone, FAX and web-based consultation to industries

Transport

Regulator to complete	
Do you intend to implement Dangerous Goods transport regulations based on the UN "Orange Book", or implement GHS for this sector (based on the UN "Purple book") or not at all? <i>Please tick one of the following three boxes</i>	
<input checked="" 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	Ministry of Transportation and Communications
Contact person	
Phone number	
E-mail address	
Website	http://www.motc.gov.tw
Only	
Section 2	
Do you currently have regulations based on the UN "Orange Book" in operation in your economy?	
<input checked="" 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.	
National Standards CNS 6864 adopted UNRTDG 14th 2005 edition in 2006. Amended regulation (Traffic Safety Rule Article 84) has entered into force in April 2008.	
Section 3	
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?	
<input type="checkbox"/> Drafted	<input type="checkbox"/> Bills Passed
<input checked="" type="checkbox"/> Proclaimed	If proclaimed, date 10/19/2007
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?	
Transition – What is the timing for the transition in this sector?	
Begin _____	End _____
What arrangements will be made available for business in this phase?	
Training courses	
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list 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 overlaid on top of GHS classification on the label? If yes, how will it work?	
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>	

Pictograms	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
Signal words	Label	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max <u> </u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
Hazard statements	Label	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max <u> </u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
Precautionary statements	Label	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max <u> </u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>none</u>
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
UNRTDG.				
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?				
Deemed-to comply provisions	<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No	
Accept additional criteria	<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No	
Other arrangements <i>Please provide a full description</i>				
Do you have training and awareness activities planned? If yes, please provide some information.				
Yes, it is in routine courses.				
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?				
No				
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.				
Extended coverage of dangerous goods and toxic chemical substance require labeling and SDS (beyond UNRTDG)				
Industry to complete				
Has it been easy to access all necessary information for compliance?				
Toxic Chemical Substance Information Center and GHS website				
Do you see any specific issues that are limiting the progress of GHS implementation / transport regulation?				
Update of national standards up to the latest international version				
Please provide detail of the work required by industry to implement GHS / transport regulations, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)				
Compliance with national standards and UNRTDG				
What are the expected benefits for industry through the implementation of GHS / transport regulations? Are there any risks that this benefit may not be achieved?				
Harmonization among aviation, sea and land transportation				
How can governments best help industry with the implementation of GHS / transport regulations?				
Training and Information center technical support				

2010 GHS Implementation Progress Reporting Template

Introduction

This template has been designed to complement the UN reporting by APEC member economies, by providing a practical insight into the progress of GHS implementation in each member economy. It builds on the ideas and information from Annexes 1 and 2 of the Report of the Virtual Working Group on GHS Implementation *"Developing Clarity and Consistency in the Implementation of the Globally Harmonized System for the Classification and Labelling of Chemicals (GHS)"* endorsed at the 7th Chemical Dialogue meeting at Peru in May 2008.

The intent of this template is to identify the progress of GHS implementation in each economy and each sector, and to identify sector specific and cross-sectoral implementation issues that may be of interest and/or concern to other economies and industry. Once identified, these issues may be addressed through further discussion between economies, with the assistance of the Chemical Dialogue or referred to the United Nations Sub-Committee of Experts on the Globally Harmonized System of classification and labelling of chemical products (UNSCEGHS).

In 2009, nine out of 21 member economies of the APEC Chemical Dialogue (CD) completed the GHS Implementation Progress Reporting Template (Template). This process not only provided invaluable information regarding the progress of GHS implementation in these economies, but the participating economies also reported that the process of completing the Template enabled articulation of implementation issues for further discussion.

APEC CD agreed that the Template should be completed by APEC economies at regular intervals to provide the opportunity for economies to share the GHS implementation workload and draw on the experiences of others in the implementation of the GHS. Regular reporting will also provide opportunities for industry to work more closely with economies to progress the development of the GHS and identify implementation issues of concern at a practical level.

In order to achieve these objectives, the template is divided into a general section, industrial sector, consumer goods, agricultural chemicals and transport. Detailed and specific answers should be provided for each of the questions. Where a reference is made to documents, information on how to access the document should follow.

Please answer all sections, even if your economy has a single set of regulations and a single regulatory body working on GHS implementation. This will help to identify any differences in approaches adopted by the different economies.

General

Please provide the Economy for which this Template is completed below.	
Hong Kong, China (HKC)	
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 type="checkbox"/> Yes [Note: HKC intends to implement GHS in the industrial sector and the implementation schedule is to be finalised. In the transport sector, certain local requirements will be harmonised with part of the GHS on hazard symbols of dangerous goods where appropriate. Please refer to section "Transport" below for details.]	<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 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 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 type="checkbox"/> No
If yes, is it mandatory classification, or for information only? How do you access the database?	

Industrial Workplace

Regulator to complete	
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	Labour Department
Contact person	CHOI Kai-yip
Phone number	(852) 2975 6408
E-mail address	DSO-D-1@labour.gov.hk
Website	No
When do you plan to implement GHS for this sector?	
To be finalized	
How long is the phase in period and what are the transition arrangements?	
In line with majority member economies;	
Co-existence of current legislation and GHS during transitional period	
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?	
When the relevant legislation is ready for enactment	
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.	
The physical and health hazard blocks that are relevant to existing legislation 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?	
Under review	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	In line with existing statutory requirements
Hazard statements	In line with existing statutory requirements
Precautionary statements	In line with existing statutory requirements
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Aiming at reducing duplication or redundancy of information	
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?	
Yes	
Do you have training and awareness activities planned? If yes, please provide some information.	
Yes, training and awareness seminars planned	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
A subject matter to be considered	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
Differences in adoption of building blocks among member economies	
Industry to complete	
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?

Consumer Products

Regulator to complete	
Do you intend to implement GHS for this sector?	
<input type="checkbox"/> Yes	<input checked="" 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 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?

Agriculture

Regulator to complete	
Do you intend to implement GHS for this sector?	
<input type="checkbox"/> Yes	<input checked="" 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 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?

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 checked="" type="checkbox"/> Implement Dangerous Goods (DG) transport regulations based on the UN "Orange Book" International Maritime Dangerous Goods Code	
<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	Fire Services Department (for dangerous goods on land) Marine Department (for dangerous goods at sea)
Contact person	Mr. Patrick LEUNG Wai-hung (Fire Services Department) Mr. Ivan SHUEN Chi-keung (Marine Department)
Phone number	852- 2733 7596 (Fire Services Department) 852- 2852 4538 (Marine Department)
E-mail address	lcpolic2@hkfsd.gov.hk (Fire Services Department) ivanshuen@mardep.gov.hk (Marine Department)
Website	http://www.hkfsd.gov.hk/ (Fire Services Department) http://www.mardep.gov.hk/ (Marine Department)
Only	
Section 2	
Do you currently have regulations based on the UN "Orange Book" in operation in your economy?	
<input type="checkbox"/> Yes	<input checked="" 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.	
<p>The Fire Services Department of the Government of the Hong Kong Special Administrative Region is the authority under the Dangerous Goods Ordinance to have control over road transport of dangerous goods in HKC. Subsidiary legislation of the Ordinance is being amended and is anticipated to be completed in 2012. Under the amendment, classification and labeling systems of dangerous goods in HKC will be modeled on the International Maritime Dangerous Goods Code which is consistent with the UN Recommendations on Transport of Dangerous Goods, Model Regulations. As danger labels of the UN Recommendations on Transport of Dangerous Goods, Model Regulations are also required by GHS for transport of dangerous goods, the local requirements of HKC for danger labels for road transport of dangerous goods will be harmonized with part of GHS on hazard symbols of dangerous goods where appropriate. Nevertheless, the Hong Kong Fire Services Department has no intention so far to implement GHS for land transport of dangerous goods or chemicals in HKC.</p> <p>The Marine Department of the Government of the Hong Kong Special Administrative Region is the authority under the Dangerous Goods Ordinance to control marine transport of dangerous goods in HKC. It has already adopted the International Maritime Dangerous Goods (IMDG) Code for the classification and labeling of dangerous goods. The marine transport of dangerous goods in HKC may, therefore, harmonize with part of the GHS on hazard symbols of dangerous goods where appropriate.</p>	
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?	

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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?	
Do you see any specific issues that are limiting the progress of GHS implementation / transport regulation?	
What are the expected costs for industry in the implementation of GHS / transport regulations?	

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

2010 GHS Implementation Progress Reporting Template

Introduction

This template has been designed to provide a practical insight into the progress of GHS implementation in each APEC member economy. It builds on the ideas and information from Annexes 1 and 2 of the Report of the Virtual Working Group on GHS Implementation “*Developing Clarity and Consistency in the Implementation of the Globally Harmonized System for the Classification and Labelling of Chemicals (GHS)*” endorsed at the 7th Chemical Dialogue meeting at Peru in May 2008. This report is intended to complement the UN GHS reporting.

The intent of this template is to identify the progress of GHS implementation in each member economy and each sector, and to identify sector specific and cross-sectoral implementation issues that may be of interest and/or concern to other economies and industry. Once identified, these issues may be addressed through further discussion between member economies, with the assistance of the Chemical Dialogue or referred to the United Nations Sub-Committee of Experts on the Globally Harmonized System of classification and labelling of chemical products (UNSCEGHS).

In 2009, nine out of 21 member economies of the APEC Chemical Dialogue (CD) completed the GHS Implementation Progress Reporting Template (Template). This process not only provided invaluable information regarding the progress of GHS implementation in these economies, but the participating member economies also reported that the process of completing the Template enabled articulation of implementation issues for further discussion.

APEC CD agreed that the Template should be completed by APEC member economies at regular intervals to provide the opportunity for economies to share the GHS implementation workload and draw on the experiences of others in the implementation of the GHS. Regular reporting will also provide opportunities for industry to work more closely with economies to progress the development of the GHS and identify implementation issues of concern at a practical level.

In order to achieve these objectives, the template is divided into a general section, industrial sector, consumer goods, agricultural chemicals and transport. Detailed and specific answers should be provided for each of the questions. Where a reference is made to documents, information on how to access these documents should follow.

Please answer all sections, even if your economy has a single set of regulations and a single regulatory body working on GHS implementation. This will help to identify any differences in approaches adopted by the different economies.

If you require any assistance on filling out the template, please contact the Catherine Oh of the Virtual Working Group on GHS at coh@accord.asn.au.

General

Please provide the Economy for which this Template is completed below.	
JAPAN	
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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, where can it be found? Please list websites, attach documents, etc.	
<ul style="list-style-type: none"> Japanese government established inter-ministerial committee and is implementing GHS. It is consisted of Ministry of Health, Labor, and Welfare (MHLW), Ministry of the Environment (MOE), Ministry of Economy, Trade, and Industry (METI), Ministry of Foreign Affairs (MOFA), Ministry of internal Affairs and Communications (MIC), Ministry of Agriculture, Forestry, and Fisheries (MAFF), and Ministry of Land, Infrastructure, Transport, and Tourism (MLIT). This committee developed "GHS Classification Guidance for the Japanese Government" to facilitate classification process dealing with chemical substances in 2009 (revised in 2010). And METI also developed guidance for chemical mixture as "GHS Classification Guidance for Enterprises" in 2009 (revised in 2010). (http://www.meti.go.jp/policy/chemical_management/int/ghs_tool_01GHSmanual.html) In 2009, Japan made the Japanese Industrial Standard (JIS) based on the GHS classification to reflect the 2nd revision of GHS Purple Book and 'Building Block approach' determined in Japan. In 2010, Japan also revised the JIS based on GHS SDS and labeling to reflected the 3rd revision of GHS Purple Book. The inter-ministerial committee decided to adopt risk-based labeling for consumer products in 2007, and "Guidance on a Consumer Product Risk Assessment for GHS Labelling" was prepared in 2008 by National Institute of Technology and Evaluation (NITE). (http://www.safe.nite.go.jp/english/ghs/consumer_product.html) 	
Do you have a GHS coordinator to facilitate implementation discussions within your economy?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Ministry of Health, Labor, and Welfare (MHLW)
Name	Mr. Hisao YAMAGUCHI
Phone number	+81-3-3502-6756
E-mail address	yamaguchi-hisao@mhlw.go.jp
Website	http://www.mhlw.go.jp/
Do you have a hazard classification database?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, is it mandatory classification, or for information only? How do you access the database?	
<ul style="list-style-type: none"> Japanese government classified substances regulated by laws (about 1400 substances since FY 2005 to 2006). With regards to hazard for their physical and human health, METI and MHLW classified substances. MOE classified their hazard for aquatic environment. The results of the classification are published on the web-site; temporary English translation of classifications are open to the public on the website (NITE website: http://www.safe.nite.go.jp/english/ghs_index.html , OECD echemportal: http://www.echemportal.org/). Japan continues classification of remaining substances. Japanese government also classified approximately 600 other substances but English translation has not been prepared so far. METI also developed the computer software for GHS classification of mixtures, which is available in Japanese and English. By inputting the GHS classification results of substances in the software, the classification of the mixture is judged and delivered automatically based on the ratio of substances in the mixture. Japan modified the software for reflecting the 2nd revision of GHS Purple Book and 'Building Block approach' in Japan in 2010. Japan also prepared the software for JIS version. (http://www.meti.go.jp/policy/chemical_management/int/ghs_auto_classification_tool_ver3) 	

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Industrial Workplace

Regulator to complete				
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 the Industrial Workplace section.</i>				
Lead Government Agency	Ministry of Health, Labour and Welfare			
Contact person	Mr. Hisao YAMAGUCHI			
Phone number	+81-3-3502-6756			
E-mail address	yamaguchi-hisao@mhlw.go.jp			
Website	http://www.mhlw.go.jp/			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input type="checkbox"/> Drafted	<input type="checkbox"/> Bills Passed	<input checked="" type="checkbox"/> Proclaimed	If proclaimed, date <u>Oct. 20, 2006</u>	
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
Web-link (http://www.mhlw.go.jp/topics/bukyoku/roudou/ghs/index.html)				
Transition – What is the timing for the transition in this sector?				
Begin <u>December 2006</u>		End <u>December 2008</u>		
What arrangements will be made available for business in this phase?				
-				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list the building blocks that will be adopted.				
Cut-off values are listed for 99 substances for labelling and 640 substances for delivering MSDS 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 °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 overlaid on top of GHS classification on the label? If yes, how will it work?				
No				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Max _____
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? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?		
Deemed-to comply provisions	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>	-	
Do you have training and awareness activities planned? If yes, please provide some information.		
No		
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?		
No		
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?		
Do you see any specific issues that are limiting the progress of GHS implementation?		
Please provide detail of the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)		
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?		
How can governments best help industry with the implementation of GHS?		

Consumer Products

Regulator to complete				
Do you intend to implement GHS for this sector?				
<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No		
<i>If Yes, please provide the following details. If No, no further answers are required for the Consumer Products Section.</i>				
Lead Government Agency	Ministry of Economy, Trade and Industry			
Contact person	Ms. Satomi MOROHASHI			
Phone number	+81-3-3501-0080			
E-mail address	morohashi-satomi@meti.go.jp			
Website	http://www.meti.go.jp/			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input type="checkbox"/> Drafting	<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date _____	
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
Transition – What is the timing for the transition in this sector?				
Begin _____		End _____		
What arrangements will be made available for business in this phase?				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per 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 list 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?				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write “none” next to “Max” in the appropriate column.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
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?		
Deemed-to-comply provisions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Other arrangements Please provide a full description		
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>GHS for consumer products is not mandatory in Japan, therefore, voluntary approaches are considered to be much important and several guidance documents and other tools are available.</p> <p>As for consumer products, the inter-ministerial committee in Japan decided to adopt risk-based labelling (Annex 5) for consumer products in 2007, and the guidance document was prepared in 2008. The English version of guidance document is available from http://www.safe.nite.go.jp/english/ghs/consumer_product.html. Also calculation tool for consumer products has been published; the title of it: The Program for the Estimation Human Exposure Used in the Risk Assessment of Consumer Products, As some industry activity, e.g. Japan Soap and Detergent Association developed the guidance document for their products http://jsda.org/w/e_engls/e_ghs01.html, and as a different toll.</p> <p>It is easy to access the information for an expert of GHS in Japan.</p>		
Do you see any specific issues that are limiting the progress of GHS implementation?		
<ul style="list-style-type: none"> Lack of experts to classify and label consumer products, especially in SMEs 		
Please detail the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)		
<ul style="list-style-type: none"> 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. 		
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?		
<ul style="list-style-type: none"> Manufacturers of consumer products would be able to provide similar level of information about GHS labelling for own your products and make consumers/other stakeholders to rely upon the products. 		
How can governments best help industry with the implementation of GHS?		
<ul style="list-style-type: none"> 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. 		

Agriculture

Regulator to complete				
Do you intend to implement GHS for this sector?				
<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No		
<i>If Yes, please provide the following details. If No, no further answers are required for the Industrial Workplace section.</i>				
Lead Government Agency	Ministry of Agriculture, Forestry, and Fisheries			
Contact person	Mr. Tomohiro ISHIOKA Mr. Sadami SUZUKI			
Phone number	+81-3-3501-3767			
E-mail address	ghs-agri@nm.maff.go.jp			
Website	http://www.maff.go.jp/			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input type="checkbox"/> Drafted		<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
Transition – What is the timing for the transition in this sector?				
Begin _____		End _____		
What arrangements will be made available for business in this phase?				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list 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?				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write “none” next to “Max” in the appropriate column.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
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 (“deemed-to comply” provisions) and will you				

accept additional classification criteria (GHS or otherwise) not adopted by your economy?		
Deemed-to comply provisions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>		
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?		
Please provide detail of the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)		
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?		
How can governments best help industry with the implementation of GHS?		

Transport

Regulator to complete	
Do you intend to implement Dangerous Goods transport regulations based on the UN "Orange Book", or implement GHS for this sector (based on the UN "Purple book") or not at all? <i>Please tick one of the following three boxes</i>	
<input checked="" 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	(by sea) Inspection and Measurement Division, Maritime Bureau, Ministry of Land, Infrastructure, Transport and Tourism
Contact person	(by sea) Mr. Shinichi KIGAWA
Phone number	(by sea) +81-3-5253-8639
E-mail address	(by sea) kigawa-s565f@mlit.go.jp
Website	http://www.mlit.go.jp/
Lead Government Agency	(by air) Flight Standards Division Civil Aviation Bureau Ministry of Land, Infrastructure and Transport
Contact person	(by air) Mr. Masafumi MACHIDA
Phone number	(by air) +81-3-5253-8731
E-mail address	(by air) machida-m2yi@mlit.go.jp
Website	http://www.mlit.go.jp/
Only	
Section 2	
Do you currently have regulations based on the UN "Orange Book" in operation in your economy?	
<input checked="" 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.	
<ul style="list-style-type: none"> • The transportation of dangerous goods by sea is harmonized with the International Maritime Dangerous Goods (IMDG) code. Classification and labeling systems of dangerous goods of the International Maritime Dangerous Goods Code is consistent with them of the UN "Orange Book". • The transportation of dangerous goods by air is harmonized with the International Civil Aviation Organization Technical Instruction (ICAO-TI). The classification and the labeling systems of dangerous goods by the ICAO-TI are consistent with them of the UN "Orange Book". 	
Section 3	
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?	
<input type="checkbox"/> Drafted	<input type="checkbox"/> Bills Passed
<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?	
Transition – What is the timing for the transition in this sector?	
Begin _____	End _____
What arrangements will be made available for business in this phase?	
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No

If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitisers. If no, please list 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.

☐ **Yes** | ☐ **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?

Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label?

If there are no maximum numbers specified, please write “none” next to “Max” in the appropriate column.

Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____

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 (“deemed-to comply” provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?

Deemed-to comply provisions ☐ **Yes** ☐ **No**

Accept additional criteria ☐ **Yes** ☐ **No**

Other arrangements
Please provide a full description

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?

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

Please provide detail of the work required by industry to implement GHS / transport regulations, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)

What are the expected benefits for industry through the implementation of GHS / transport regulations? Are there any risks that this benefit may not be achieved?

How can governments best help industry with the implementation of GHS / transport regulations?

2010 GHS Implementation Progress Reporting Template

Introduction

This template has been designed to complement the UN reporting by APEC member economies, by providing a practical insight into the progress of GHS implementation in each member economy. It builds on the ideas and information from Annexes 1 and 2 of the Report of the Virtual Working Group on GHS Implementation *“Developing Clarity and Consistency in the Implementation of the Globally Harmonized System for the Classification and Labelling of Chemicals (GHS)”* endorsed at the 7th Chemical Dialogue meeting at Peru in May 2008.

The intent of this template is to identify the progress of GHS implementation in each economy and each sector, and to identify sector specific and cross-sectoral implementation issues that may be of interest and/or concern to other economies and industry. Once identified, these issues may be addressed through further discussion between economies, with the assistance of the Chemical Dialogue or referred to the United Nations Sub-Committee of Experts on the Globally Harmonized System of classification and labelling of chemical products (UNSCEGHS).

In 2009, nine out of 21 member economies of the APEC Chemical Dialogue (CD) completed the GHS Implementation Progress Reporting Template (Template). This process not only provided invaluable information regarding the progress of GHS implementation in these economies, but the participating economies also reported that the process of completing the Template enabled articulation of implementation issues for further discussion.

APEC CD agreed that the Template should be completed by APEC economies at regular intervals to provide the opportunity for economies to share the GHS implementation workload and draw on the experiences of others in the implementation of the GHS. Regular reporting will also provide opportunities for industry to work more closely with economies to progress the development of the GHS and identify implementation issues of concern at a practical level.

In order to achieve these objectives, the template is divided into a general section, industrial sector, consumer goods, agricultural chemicals and transport. Detailed and specific answers should be provided for each of the questions. Where a reference is made to documents, information on how to access the document should follow.

Please answer all sections, even if your economy has a single set of regulations and a single regulatory body working on GHS implementation. This will help to identify any differences in approaches adopted by the different economies.

General

Please provide the Economy for which this Template is completed below.	
MALAYSIA	
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.	
In the process of planning the strategic roadmap.	
Do you have a GHS coordinator to facilitate implementation discussions within your economy?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Ministry of International Trade and Industry (MITI)
Name	Ms. Gan Mui Huei
Phone number	+603 62034773
E-mail address	bmhgan@miti.gov.my
Website	http://www.miti.gov.my
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

Regulator to complete	
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	Department of Occupational Safety and Health
Contact person	Dr. Majahar bin Abdul Rahman
Phone number	+603 8886 5088
E-mail address	majahar@mohr.gov.my
Website	http://www.dosh.gov.my
When do you plan to implement GHS for this sector?	
Expected to be implemented in 2011, the earliest.	
How long is the phase in period and what are the transition arrangements?	
1 year for substances and 3 years for mixtures.	
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? The CLASS Regulations are in the process of being reviewed by the Attorney General's Chambers, Malaysia, and are expected to be signed into law by the Minister of Human Resources, Malaysia, in 2011, at the earliest. There are plans to set up a 'GHS website' which will act as a one-stop centre for GHS related information and the establishment of 'e-MyGHS Network, a platform to discuss technical aspects of GHS implementation.	
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.	
All except the following building blocks will be adopted: "Flammable Liquids Category 4", "Acute Toxicity (Oral, Dermal, Inhalation) Category 5", "Skin Corrosive / Irritant Category 3", "Aspiration Hazard Category 2", and "Hazardous to the Aquatic Environment – Acute Hazard Categories 2 and 3".	
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?	
No.	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	No.
Hazard statements	No.
Precautionary statements	Maximum of 6.
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
In the proposed CLASS Regulations and the accompanying Industry Code of Practice.	
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?
No.
Do you have training and awareness activities planned? If yes, please provide some information.
Yes. Under the UNITAR GHS Capacity Building Project in Malaysia for the period 2011 – 2012.
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?
Not in the near future.
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
<ol style="list-style-type: none"> 1. Getting the necessary numbers of experts on, among others, toxicology, biology and physical chemistry on board. 2. Issues of a lack of experts to carry out classification according to GHS. 3. Issues of a lack of experts who are competent to conduct GHS training or courses. 4. Ability of the local laboratories in conducting the various tests in order to classify industrial chemicals. 5. Difficulty in including hazard pictograms and hazard information in dual languages for containers less than 500 mL. 6. Difficulty in implementing the building block approach due to non-harmonization among countries. 7. Issues of the level of commitment by the industries in acquiring the necessary know-how on the GHS.
<i>Industry to complete</i>
Has it been easy to access all necessary information for compliance?
Apart from the GHS Purple Book and also the Malaysian Standard, other information to guide the local industry for mandatory compliance is not yet available until the new regulation based on GHS for industrial workplace is gazetted.
Do you see any specific issues that are limiting the progress of GHS implementation?
<p>Without the implementation of the new regulation based on GHS, it will be difficult for industry to implement GHS within their operations as they are still required under the law to comply with the Occupational Safety and Health (Classification, Packaging and Labeling of Hazardous Chemicals) Regulations 1997.</p> <p>Industry needs more GHS training, including guidance on classification of chemicals according to GHS building blocks.</p> <p>The "non-harmonized GHS requirements worldwide" issue can manifests itself in different forms, e.g. different cut-off values for preparations, adoption of different GHS versions (which is published every 2 years; some countries now adopt GHS 2nd version, some adopting 3rd version already). This inevitably causes confusion and adds extra compliance costs to companies, especially those that supply to many countries.</p> <p>GHS is based on self-classification principle, yet many countries e.g. Japan, Korea; has come up with a GHS classification list for their countries. This could lead to companies spending time and resources to justify their self-classification if it's different from the Government's classification.</p>

What are the expected costs for industry in the implementation of GHS?
<p>The expected cost will be for updating and printing new labels, updating of safety data sheets and printing of new packaging materials which already have preprinted safety labels on the cans/containers. The cost of old labels will have to be scraped off.</p> <p>Apart from the above, industry cost and burden associated with implementation of a new regulation include; rules familiarization, compliance determinations, training, recordkeeping, database maintenance, and maintenance of duplicate systems and processes during the adoption periods.</p> <p>As more and more Asia Pacific countries have already adopted GHS, huge efforts and costs are required to maintain 2 versions of SDS GHS version for Asia Pacific countries which has implemented GHS and those that have not implemented GHS.</p> <p>Based on present situation in Malaysia, it would be a burden to the industry by having different types of labels to meet the existing Malaysian regulatory requirement and GHS requirement for other Asia Pacific countries which have implemented GHS. Furthermore, there is more information on the GHS-SDS document than the existing MSDS version and thus GHS-SDS version has also served; if not better, the main objective of having existing MSDS version. In view of this, it would be better if the Government can accept both existing and GHS-SDS versions concurrently. Thereafter, GHS-SDS and labels will be acceptable to the Malaysia upon GHS implementation in Malaysia.</p>
What are the expected benefits for industry through the implementation of GHS?
<p>As more and more countries are adopting GHS, less time and cost will be dedicated to customize the labeling and safety data sheets according to the requirements of the importing country. However, the expected GHS benefit threshold will remain elusive, until the major trading partners of the APEC countries, i.e. US and EU fully adopt GHS (for US - 2014, EU - 2015).</p>

Current as of February 10, 2011.

Agriculture

Regulator to complete	
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 sector.</i>	
Lead Government Agency	Department of Agriculture
Contact person	Mr Halimi Mahmud
Phone number	+603 20301472
E-mail address	halimi@doa.gov.my
Website	www.doa.gov.my
When do you plan to implement GHS for this sector?	
Awaiting the latest version of "FOA/WHO Guidelines on Good Labeling Practice for Pesticide" which are currently being updated by FAO/WHO to incorporate GHS elements .	
How long is the phase in period and what are the transition arrangements?	
Amendment to the Pesticide (Labeling) Regulation 1984 under the Pesticides Act 1974 will be made based on recommendations of the latest version of FAO/WHO Guidelines.	
Are the main relevant legislations finalized?	
<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?	
Not likely	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	Depending on FAO/WHO Guidelines
Hazard statements	Depending on FAO/WHO Guidelines
Precautionary statements	Depending on FAO/WHO Guidelines
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Depending on FAO/WHO Guidelines	
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?	

<p>Importation of pesticides is controlled under the Pesticides Act 1974. Before they are allowed to be imported, registration approval must be obtained from the Pesticides Board of Malaysia and one of the requirements of registration is for the pesticide to be labeled in accordance with the labeling regulations</p>
<p>Do you have training and awareness activities planned? If yes, please provide some information.</p>
<p>Awareness program to the pesticide industry has been conducted</p>
<p>Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?</p>
<p>Not at the moment</p>
<p>Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.</p>
<p>1. Lack of internationally clear guidelines on how to incorporate GHS elements in pesticide labeling 2. Lack of technical knowledge on GHS among the personnels at the regulatory authority</p>
<p><i>Industry to complete</i></p>
<p>Has it been easy to access all necessary information for compliance?</p>
<p>Not always</p>
<p>Do you see any specific issues that are limiting the progress of GHS implementation?</p>
<p>Unless it is made mandatory</p>
<p>What are the expected costs for industry in the implementation of GHS?</p>
<p>The initial cost of changing the current pesticide label to GHS labeling system will be tremendous, and most likely it will be passed to the consumers</p>
<p>What are the expected benefits for industry through the implementation of GHS?</p>
<p>In the long run, it will benefit the industry in terms of meeting the labeling requirements of regulatory authorities, because only one harmonized system is used worldwide.</p>

Consumer Products

Regulator to complete	
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 sector.</i>	
Lead Government Agency	Ministry of Domestic Trade, Co-operatives and Consumerism
Contact person	Ms. Thiagaletchumi V. Maniam
Phone number	+603 88825862
E-mail address	letchumi@kpdnkk.gov.my
Website	http://www.kpdnkk.gov.my
When do you plan to implement GHS for this sector?	
Still in the planning stage	
How long is the phase in period and what are the transition arrangements?	
To be confirmed	
Are the main relevant legislations finalized?	
<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?	
NA	
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.	
NA	
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.	
NA	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
NA	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	To be confirmed, under research
Hazard statements	To be confirmed, under research
Precautionary statements	To be confirmed, under research
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
To be confirmed, under research	
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?	
No	
Do you have training and awareness activities planned? If yes, please provide some information.	
No	
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.
NA
<i>Industry to complete</i>
Has it been easy to access all necessary information for compliance?
No
Do you see any specific issues that are limiting the progress of GHS implementation?
None at the moment, under research
What are the expected costs for industry in the implementation of GHS?
To be confirmed, under research
What are the expected benefits for industry through the implementation of GHS?
To be confirmed, under research

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 checked="" 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	Ministry of Transport
Contact person	Mr. Zakuan Abd Halim
Phone number	+60388866171
E-mail address	zakuan@mot.gov.my
Website	
Only	
Section 2	
Do you currently have regulations based on the UN "Orange Book" in operation in your economy?	
<input checked="" 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.	
The Civil Aviation Regulation 1996 refers to the updated "Orange Book".	
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?	
Do you see any specific issues that are limiting the progress of GHS implementation / transport regulation?	
What are the expected costs for industry in the implementation of GHS / transport regulations?	
What are the expected benefits for industry through the implementation of GHS / transport regulations?	

2010 GHS Implementation Progress Reporting Template

Introduction

This template has been designed to provide a practical insight into the progress of GHS implementation in each APEC member economy. It builds on the ideas and information from Annexes 1 and 2 of the Report of the Virtual Working Group on GHS Implementation “*Developing Clarity and Consistency in the Implementation of the Globally Harmonized System for the Classification and Labelling of Chemicals (GHS)*” endorsed at the 7th Chemical Dialogue meeting at Peru in May 2008. This report is intended to complement the UN GHS reporting.

The intent of this template is to identify the progress of GHS implementation in each member economy and each sector, and to identify sector specific and cross-sectoral implementation issues that may be of interest and/or concern to other economies and industry. Once identified, these issues may be addressed through further discussion between member economies, with the assistance of the Chemical Dialogue or referred to the United Nations Sub-Committee of Experts on the Globally Harmonized System of classification and labelling of chemical products (UNSCEGHS).

In 2009, nine out of 21 member economies of the APEC Chemical Dialogue (CD) completed the GHS Implementation Progress Reporting Template (Template). This process not only provided invaluable information regarding the progress of GHS implementation in these economies, but the participating member economies also reported that the process of completing the Template enabled articulation of implementation issues for further discussion.

APEC CD agreed that the Template should be completed by APEC member economies at regular intervals to provide the opportunity for economies to share the GHS implementation workload and draw on the experiences of others in the implementation of the GHS. Regular reporting will also provide opportunities for industry to work more closely with economies to progress the development of the GHS and identify implementation issues of concern at a practical level.

In order to achieve these objectives, the template is divided into a general section, industrial sector, consumer goods, agricultural chemicals and transport. Detailed and specific answers should be provided for each of the questions. Where a reference is made to documents, information on how to access these documents should follow.

Please answer all sections, even if your economy has a single set of regulations and a single regulatory body working on GHS implementation. This will help to identify any differences in approaches adopted by the different economies.

If you require any assistance on filling out the template, please contact the Catherine Oh of the Virtual Working Group on GHS at coh@accord.asn.au.

General

Please provide the Economy for which this Template is completed below.	
Russian Federation	
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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, where can it be found? Please list websites, attach documents, etc.	
Technical Regulations "On safety of chemical products"	
Do you have a GHS coordinator to facilitate implementation discussions within your economy?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Federal Agency on Technical Regulating and Metrology/ Russian Researcher Center on Standartization, Certification and Testing of materials (FSUE VNICSMV)
Name	Alexander Kozlov
Phone number	+74955437262 (int.1111)
E-mail address	a.kozlov@vnicsmv.ru
Website	www.vnicsmv.ru
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

Regulator to complete				
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 the Industrial Workplace section.</i>				
Lead Government Agency	Federal Agency on Technical Regulating and Metrology/ Russian Researcher Center on Standardization, Certification and Testing of materials (FSUE VNICSMV)			
Contact person	Alexander Kozlov			
Phone number	+74955437262 (int.1111)			
E-mail address	a.kozlov@vnicismv.ru			
Website	www.vnicismv.ru			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input checked="" type="checkbox"/> Drafted		<input type="checkbox"/> Bills Passed		<input type="checkbox"/> Proclaimed If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
Approximately December 2011				
Transition – What is the timing for the transition in this sector?				
Begin—At least 5 years		End		
What arrangements will be made available for business in this phase?				
???				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list the building blocks that will be adopted.				
Cut-off concentrations for classification, labelling and SDS requirements for mixtures included in the Russian's standards on chemicals classification, and published as a separate document . The choice of the cut-off points the same as in the purple book.				
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 overlaid on top of GHS classification on the label? If yes, how will it work?				
No decision yet. The risk-based labelling approach in the current risk assessment framework has the capacity to incorporate elements of the GHS.				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? If there are no maximum numbers specified, please write “none” next to “Max” in the appropriate column .				
Pictograms	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
Signal words	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>1</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>1</u>
Hazard statements	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
Precautionary statements	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
At the moment there is no defined the hierarchy of hazard statements and precautionary statements, but it will do in future for precautionary statements.				

<p>The hierarchy of pictograms is:</p> <p>(a) if the hazard pictogram 'GHS06' applies, the hazard pictogram 'GHS07' shall not appear;</p> <p>(b) if the hazard pictogram 'GHS05' applies, the hazard pictogram 'GHS07' shall not appear for skin or eye irritation;</p> <p>(c) if the hazard pictogram 'GHS08' applies for respiratory sensitisation, the hazard pictogram 'GHS07' shall not appear for skin sensitisation or for skin and eye irritation.</p>		
<p>Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?</p>		
Deemed-to comply provisions	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>	<p>Imported chemicals will need to comply with Russian regulatory requirements</p>	
<p>Do you have training and awareness activities planned? If yes, please provide some information.</p>		
<p>Yes, the CISCENTER is coordinating such events (www.ciscenter.ru)</p>		
<p>Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?</p>		
<p>No</p>		
<p>Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.</p>		
<ul style="list-style-type: none"> — The current lack of trained people from a theoretical and practical point of view on the understanding of principles of classification of substances and preparations as well as on safe handling of chemicals make implementation of the system a major difficulty — it will be necessary to read across the regulation with several other local regulations for the management of chemicals in place in order to avoid contradictions, which may result in legal difficulties and longer time than expected for the local implementation of GHS 		
<p><i>Industry to complete</i></p>		
<p>Has it been easy to access all necessary information for compliance?</p>		
<p>For majority, it is not easy to access all the necessary information for compliance</p>		
<p>Do you see any specific issues that are limiting the progress of GHS implementation?</p>		
<p>Yes, such as</p> <ul style="list-style-type: none"> - Insufficiency in data/database, such as toxicity and ecotoxicity data - Differences between Russian and EU data for the same substances - Difficulty in choose an adequate data for classification when there are so many reliable data - Differences in adoption of building blocks among member economies and other countries - Difficulty in data sharing due to confidentiality - Lack of consumer understanding on GHS (e.g. meaning of pictograms) 		
<p>Please provide detail of the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)</p>		
<p>Training of staff</p>		
<p>What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?</p>		
<p>One of the benefit is reducing the cost of transportation chemicals between Russia and other countries via using harmonization chemical legislation. Risk is differences between accepted EU and Russian hazard categories, and therefore, differences in label.</p>		

How can governments best help industry with the implementation of GHS?
By creating a common list of classification of substances (as like as Table 3.1 Annex VI CLP Regulation)

Consumer Products

Regulator to complete				
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 the Consumer Products Section.</i>				
Lead Government Agency	Federal Agency on Technical Regulating and Metrology/ Russian Researcher Center on Standardization, Certification and Testing of materials (FSUE VNICSMV)			
Contact person	Alexander Kozlov			
Phone number	+74955437262 (int.1111)			
E-mail address	a.kozlov@vnicsmv.ru			
Website	www.vnicsmv.ru			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input checked="" type="checkbox"/> Drafting		<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
Approximately December 2011				
Transition – What is the timing for the transition in this sector?				
Begin At least 5 years		End _____		
What arrangements will be made available for business in this phase?				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input checked="" 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 list the building blocks that will be adopted.				
Cut-off concentrations for classification, labelling and SDS requirements for mixtures included in the Russian's standards on chemicals classification, and published as a separate document . The choice of the cut-off points the same as in the purple book.				
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 overlaid on top of GHS classification on the label? If yes, how will it work?				
No decision yet. The risk-based labelling approach in the current risk assessment framework has the capacity to incorporate elements of the GHS.				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>				
Pictograms	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
Signal words	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>1</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>1</u>
Hazard statements	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
Precautionary statements	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
At the moment there is no defined the hierarchy of hazard statements and precautionary statements, but it will do in future for precautionary statements.				

<p>The hierarchy of pictograms the same as the Purple Book:</p> <p>(a) if the hazard pictogram 'GHS06' applies, the hazard pictogram 'GHS07' shall not appear;</p> <p>(b) if the hazard pictogram 'GHS05' applies, the hazard pictogram 'GHS07' shall not appear for skin or eye irritation;</p> <p>(c) if the hazard pictogram 'GHS08' applies for respiratory sensitisation, the hazard pictogram 'GHS07' shall not appear for skin sensitisation or for skin and eye irritation.</p>		
<p>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?</p>		
Deemed-to-comply provisions	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>	Imported chemicals will need to comply with Russian regulatory requirements	
<p>Do you have training and awareness activities planned? If yes, please provide some information.</p> <p>Yes, the CISCENTER is coordinating such events (http://www.ciscenter.ru/en/)</p>		
<p>Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?</p> <p>No</p>		
<p>Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.</p> <ul style="list-style-type: none"> — The current lack of trained people from a theoretical and practical point of view on the understanding of principles of classification of substances and preparations as well as on safe handling of chemicals make implementation of the system a major difficulty — it will be necessary to read across the regulation with several other local regulations for the management of chemicals in place in order to avoid contradictions, which may result in legal difficulties and longer time than expected for the local implementation of GHS 		
<i>Industry to complete</i>		
<p>Has it been easy to access all necessary information for compliance?</p> <p>For majority, it is not easy to access all the necessary information for compliance</p>		
<p>Do you see any specific issues that are limiting the progress of GHS implementation?</p> <p>Yes,</p> <ul style="list-style-type: none"> - Insufficiency in data/database, such as toxicity and ecotoxicity data - Differences between Russian and EU data for the same substances - Difficulty in choose an adequate data for classification when there are so many reliable data - Differences in adoption of building blocks among member economies and other countries - Difficulty in data sharing due to confidentiality - Lack of consumer understanding on GHS (e.g. meaning of pictograms) 		
<p>Please detail the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)</p> <p>Training of staff</p>		
<p>What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?</p> <p>One of the benefit is reducing the cost of transportation chemicals between Russia and other countries via using harmonization chemical legislation. Risk is differences between accepted EU and Russian hazard categories, and therefore, differences in label.</p>		

How can governments best help industry with the implementation of GHS?
By creating a common list of classification of substances (as like as Table 3.1 Annex VI CLP Regulation)

Agriculture

Regulator to complete				
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 the Industrial Workplace section.</i>				
Lead Government Agency	Federal Agency on Technical Regulating and Metrology/ Russian Researcher Center on Standardization, Certification and Testing of materials (FSUE VNICSMV)			
Contact person	Alexander Kozlov			
Phone number	+74955437262 (int.1111)			
E-mail address	a.kozlov@vnicismv.ru			
Website	www.vnicismv.ru			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input checked="" type="checkbox"/> Drafted		<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
December 2011				
Transition – What is the timing for the transition in this sector?				
Begin At least 5 years		End		
What arrangements will be made available for business in this phase?				
???				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list the building blocks that will be adopted.				
Cut-off concentrations for classification, labelling and SDS requirements for mixtures included in the Russian's standards on chemicals classification, and published as a separate document . The choice of the cut-off points the same as in the purple book.				
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 overlaid on top of GHS classification on the label? If yes, how will it work?				
No decision yet. The risk-based labelling approach in the current risk assessment framework has the capacity to incorporate elements of the GHS.				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>				
Pictograms	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
Signal words	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>1</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>1</u>
Hazard statements	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
Precautionary statements	Label	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
	SDS	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Max <u>None</u>
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
At the moment there is no defined the hierarchy of hazard statements and precautionary statements, but it will do in future for precautionary statements.				

<p>The hierarchy of pictograms is:</p> <p>(a) if the hazard pictogram 'GHS06' applies, the hazard pictogram 'GHS07' shall not appear;</p> <p>(b) if the hazard pictogram 'GHS05' applies, the hazard pictogram 'GHS07' shall not appear for skin or eye irritation;</p> <p>(c) if the hazard pictogram 'GHS08' applies for respiratory sensitisation, the hazard pictogram 'GHS07' shall not appear for skin sensitisation or for skin and eye irritation.</p>		
<p>Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?</p>		
Deemed-to comply provisions	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>	Imported chemicals will need to comply with Russian regulatory requirements	
<p>Do you have training and awareness activities planned? If yes, please provide some information.</p> <p>Yes, the CISCENTER is coordinating such events (www.ciscenter.ru)</p>		
<p>Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?</p> <p>No</p>		
<p>Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.</p> <ul style="list-style-type: none"> — The current lack of trained people from a theoretical and practical point of view on the understanding of principles of classification of substances and preparations as well as on safe handling of chemicals make implementation of the system a major difficulty — it will be necessary to read across the regulation with several other local regulations for the management of chemicals in place in order to avoid contradictions, which may result in legal difficulties and longer time than expected for the local implementation of GHS 		
Industry to complete		
<p>Has it been easy to access all necessary information for compliance?</p> <p>For majority, it is not easy to access all the necessary information for compliance</p>		
<p>Do you see any specific issues that are limiting the progress of GHS implementation?</p> <p>Yes, there is no sufficient of data about substances for classification and labelling. Also there is differences between Russian and EU data for the same substances.</p>		
<p>Please provide detail of the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)</p> <p>Training of staff</p>		
<p>What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?</p> <p>One of the benefit is reducing the cost of transportation chemicals between Russia and other countries via using harmonization chemical legislation. Risk is differences between accepted EU and Russian hazard categories, and therefore, differences in label.</p>		
<p>How can governments best help industry with the implementation of GHS?</p> <p>By creating a common list of classification of substances (as like as Table 3.1 Annex VI CLP Regulation)</p>		

Transport

Regulator to complete	
Do you intend to implement Dangerous Goods transport regulations based on the UN "Orange Book", or implement GHS for this sector (based on the UN "Purple book") or not at all? <i>Please tick one of the following three boxes</i>	
<input checked="" 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	Minister of Transport and Communications of Russia
Contact person	
Phone number	
E-mail address	
Website	http://www.mintrans.ru/
Only	
Section 2	
Do you currently have regulations based on the UN "Orange Book" in operation in your economy?	
<input checked="" type="checkbox"/> Yes, in part; <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.	
<p>This transport sector regulation is compatible with GHS only partly. Russian legislation based on the UN "Orange Book" is very old and it will change in future for some regulation. In the transport sector, certain local requirements will be harmonised with part of the GHS on hazard symbols of dangerous goods where appropriate. Please refer to the following for details.</p> <p>The transport of dangerous goods depends on the mode of transportation.</p> <p>For international transport of dangerous goods:</p> <p>Russia has joined to The International Convention for the Safety of Life at Sea (SOLAS) and use IMDG Code</p> <p>Russia use European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)</p> <p>Russia has joined to the Organization for Cooperation of Railways (OSJD or OSShD) and use Annex II of Agreements on international freight communications and the Carriages of Goods by Rail (CIM)</p> <p>Main document to transportation dangerous goods on the area of Russia is GOST 19433-88 «Dangerous goods. Classification and marking». Now it is revising according to UN Model Regulations on the Transport of Dangerous Goods.</p> <p>Also Russia have some regulation for the transport of dangerous goods on the area of Russia which depends on the mode of transportation.</p>	
Section 3	
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?	
<input type="checkbox"/> Drafted	<input type="checkbox"/> Bills Passed <input type="checkbox"/> Proclaimed <input type="checkbox"/> If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?	
Transition – What is the timing for the transition in this sector?	
Begin _____	End _____
What arrangements will be made available for business in this phase?	

Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list 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 overlaid on top of GHS classification on the label? If yes, how will it work?				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
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 ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?				
Deemed-to comply provisions	<input type="checkbox"/> Yes		<input type="checkbox"/> No	
Accept additional criteria	<input type="checkbox"/> Yes		<input type="checkbox"/> No	
Other arrangements <i>Please provide a full description</i>				
Do you have training and awareness activities planned? If yes, please provide some information.				
No				
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?				
No				
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?				
No				
Do you see any specific issues that are limiting the progress of GHS implementation / transport				

regulation?
???
Please provide detail of the work required by industry to implement GHS / transport regulations, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)
Training of staff
What are the expected benefits for industry through the implementation of GHS / transport regulations? Are there any risks that this benefit may not be achieved?
...
How can governments best help industry with the implementation of GHS / transport regulations?
...

2010 GHS Implementation Progress Reporting Template

Introduction

This template has been designed to provide a practical insight into the progress of GHS implementation in each APEC member economy. It builds on the ideas and information from Annexes 1 and 2 of the Report of the Virtual Working Group on GHS Implementation “*Developing Clarity and Consistency in the Implementation of the Globally Harmonized System for the Classification and Labelling of Chemicals (GHS)*” endorsed at the 7th Chemical Dialogue meeting at Peru in May 2008. This report is intended to complement the UN GHS reporting.

The intent of this template is to identify the progress of GHS implementation in each member economy and each sector, and to identify sector specific and cross-sectoral implementation issues that may be of interest and/or concern to other economies and industry. Once identified, these issues may be addressed through further discussion between member economies, with the assistance of the Chemical Dialogue or referred to the United Nations Sub-Committee of Experts on the Globally Harmonized System of classification and labelling of chemical products (UNSCEGHS).

In 2009, nine out of 21 member economies of the APEC Chemical Dialogue (CD) completed the GHS Implementation Progress Reporting Template (Template). This process not only provided invaluable information regarding the progress of GHS implementation in these economies, but the participating member economies also reported that the process of completing the Template enabled articulation of implementation issues for further discussion.

APEC CD agreed that the Template should be completed by APEC member economies at regular intervals to provide the opportunity for economies to share the GHS implementation workload and draw on the experiences of others in the implementation of the GHS. Regular reporting will also provide opportunities for industry to work more closely with economies to progress the development of the GHS and identify implementation issues of concern at a practical level.

In order to achieve these objectives, the template is divided into a general section, industrial sector, consumer goods, agricultural chemicals and transport. Detailed and specific answers should be provided for each of the questions. Where a reference is made to documents, information on how to access these documents should follow.

Please answer all sections, even if your economy has a single set of regulations and a single regulatory body working on GHS implementation. This will help to identify any differences in approaches adopted by the different economies.

If you require any assistance on filling out the template, please contact the Catherine Oh of the Virtual Working Group on GHS at coh@accord.asn.au.

General

Please provide the Economy for which this Template is completed below.	
CHILE	
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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Ministry of Health
Name	Ms. Pamela Santibañez
Phone number	(56 2) 5740791
E-mail address	psantibanez@minsal.cl
Website	www.minsal.cl
Do you have a hazard classification database?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, is it mandatory classification, or for information only? How do you access the database?	
It is used the United Nations classification and it is mandatory for transport and from March 2011 it will be for warehousing	

Industrial Workplace

Regulator to complete				
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 the Industrial Workplace section.</i>				
Lead Government Agency	Ministry of Health			
Contact person	Ms. Pamela Santibañez			
Phone number	(56 2) 5740791			
E-mail address	psantibanez@minsal.cl			
Website	www.minsal.cl			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input checked="" type="checkbox"/> Drafted		<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
It is developing a National Implementation Strategy, which will include the industrial sector				
Transition – What is the timing for the transition in this sector?				
Begin _____		End _____		
What arrangements will be made available for business in this phase?				
Not defined yet				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list the building blocks that will be adopted.				
Not defined yet				
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.				
Not defined yet				
Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?				
Not defined yet				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
Not defined yet				
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?				

Deemed-to comply provisions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>	Not defined yet	
Do you have training and awareness activities planned? If yes, please provide some information.		
For the year 2011, it is planned to develop awareness activities of GHS, both public and private sector		
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?		
Not for now		
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.		
<ul style="list-style-type: none"> - Our Economy has spent several years trying to implement GHS, however this has not resulted (there is not any document how it will be implemented). For this reason, in this stage our main objective is developing an implementation strategy. - It has been difficult to get the participation of representatives organizations of civil society 		
Industry to complete		
Has it been easy to access all necessary information for compliance?		
There is no information from a regulatory point of view to comply with GHS, even though there is a starting work in progress, to participate in two projects that include funding for the implementation on GHS. Exporters to the following economies were prompt to implement GHS local implementations: 1) UE: Directive 1272, also known as CLP Directive 2) Korea: Standard for Classification, Labeling of Chemical Substance and Material Safety Data Sheet according the Industrial Safety & Health Act, 2008 3) Japan: JIZ Z 7250 (2005) Standard.		
Do you see any specific issues that are limiting the progress of GHS implementation?		
As far as we know, there are limited or no budget from the State to do so. Moreover, when funds would be considered, Chilean State will need to provide a special and intensive training process to the regulators, in those specifics subjects, essential for a successful implementation of the GHS. There are a few companies that have presented concern about probable impacts on the GHS implementation, due our current regulation (which covers UN recommendations on the transport of hazardous materials) is different in some aspects with GHS, so it might cause confusion on regulators or inspectors, with no proper training on the GHS labeling.		
Please provide detail of the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)		
The workload supposed to be very intensive, since a lot of areas need to be covered. From the classification point of view, there is a chance to have less workload since we do not expect to find big changes from the current UN system used for Transportation. Nevertheless because there are new divisions and risk to taking into account, this will take a lot of time to comply. Therefore, timing is essential to best implementing the GHS. Most challenges are expected from the labeling part, due the absence of a clear regulation on risk communication other than the used at the transport.		
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?		
Main benefit is the market access to those economies to have covered the GHS on their legislations. The main risk to not achieve this benefit, start when different approaches might create different regulations and conditions, in different countries. This condition itself, create a contradiction on the initiative to harmonize the criteria. Nevertheless there is a small impact expected in this area, due unequal opinions on risk assessment.		

How can governments best help industry with the implementation of GHS?

Creating a clear and yet achievable regulatory scenario, all industry must align their processes to get a uniform classification and risk communications systems. When formulating this regulations and laws it is fundamental to consult the industry representatives to create effective pieces of law that contribute with the GHS objectives. There is also important to consider a reasonable timeline and steps to implement, giving a fair space of time, to small size companies to comply. It also would help creating instruments to co-financing the implementation in small companies or group of them, using i.e.: a "Clean Production" approach. Finally it would be desirable, to consider similar regulations in the UE or other countries that has already implemented GHS, taking advantage of the variety of languages used at the UE including Spanish.

Consumer Products

Regulator to complete				
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 the Consumer Products Section.</i>				
Lead Government Agency	Ministry of Health			
Contact person	Ms. Pamela Santibañez			
Phone number	(56 2) 5740791			
E-mail address	psantibanez@minsal.cl			
Website	www.minsal.cl			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input type="checkbox"/> Drafting	<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date _____	
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
As part of the developing of the Implementation National Strategy, it will include the application to the consumer products, however this work is just began and it not defined how and who will implement it				
Transition – What is the timing for the transition in this sector?				
Begin _____		End _____		
What arrangements will be made available for business in this phase?				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per 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 list 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.				
Not defined yet				
Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?				
Not defined yet				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				

Not defined yet		
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?		
Deemed-to-comply provisions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Other arrangements Please provide a full description	Not defined yet	
Do you have training and awareness activities planned? If yes, please provide some information.		
For the year 2011, it is planned to develop awareness activities of GHS, both public and private sector		
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?		
Not for now		
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.		
<ul style="list-style-type: none"> - Our Economy has spent several years trying to implement GHS, however this has not resulted (there is not any document how it will be implemented). For this reason, in this stage our main objective is developing an implementation strategy. - It has been difficult to get the participation of representatives organizations of civil society 		
<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?		
Please detail the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)		
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?		
How can governments best help industry with the implementation of GHS?		

Agriculture

Regulator to complete				
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 the Industrial Workplace section.</i>				
Lead Government Agency	Agricultural and Livestock Service			
Contact person	Mr. Ignacio Figueroa			
Phone number	(56 2) 6950805			
E-mail address	ignacio.figueroa@sag.gob.cl			
Website	www.sag.cl			
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?				
<input checked="" type="checkbox"/> Drafted		<input type="checkbox"/> Bills Passed	<input type="checkbox"/> Proclaimed	If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?				
It is developing a National Implementation Strategy, which will include the agricultural sector.				
Transition – What is the timing for the transition in this sector?				
Begin _____		End _____		
What arrangements will be made available for business in this phase?				
Not defined yet				
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?				
<input type="checkbox"/> Yes		<input type="checkbox"/> No		
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list the building blocks that will be adopted.				
Not defined yet				
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.				
Not defined yet				
Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?				
Not defined yet				
Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label? <i>If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.</i>				
Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?				
Not defined yet				
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?				

Deemed-to comply provisions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Accept additional criteria	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>	Not defined yet	
Do you have training and awareness activities planned? If yes, please provide some information.		
For the year 2011, it is planned to develop awareness activities of GHS, both public and private sector		
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?		
Not for now		
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.		
<ul style="list-style-type: none"> - Our Economy has spent several years trying to implement GHS, however this has not resulted (there is not any document how it will be implemented). For this reason, in this stage our main objective is developing an implementation strategy. - It has been difficult to get the participation of representatives organizations of civil society 		
<i>Industry to complete</i>		
Has it been easy to access all necessary information for compliance?		
Pesticides, in accordance with existing regulation, must be registered prior putting the products on the market. In this process the industry must submit the data for supporting toxicological and ecotoxicological requirements required by the regulation.		
Do you see any specific issues that are limiting the progress of GHS implementation?		
We understand GHS uses FAO/WHO criteria for pesticides labeling		
Please provide detail of the work required by industry to implement GHS, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)		
We consider important develop joint training public and private sector, and the assimilation of FAO/WHO criteria about pesticides.		
What are the expected benefits for industry through the implementation of GHS? Are there any risks that this benefit may not be achieved?		
We consider important and beneficial the implementation of information system to users		
How can governments best help industry with the implementation of GHS?		
We consider indispensable the phased implementation of the system in order to generate capacities for each of them facilitating the implementation		

Transport

Regulator to complete	
Do you intend to implement Dangerous Goods transport regulations based on the UN "Orange Book", or implement GHS for this sector (based on the UN "Purple book") or not at all? <i>Please tick one of the following three boxes</i>	
<input checked="" type="checkbox"/> Implement Dangerous Goods (DG) transport regulations based on the UN "Orange Book"	
<input checked="" 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	Ministry of Transport and Telecommunications, Transportation Undersecretary
Contact person	Mr. Víctor Carrasco Poblete
Phone number	(56 2) 4213422
E-mail address	vcarrasc@mtt.cl
Website	www.mtt.cl
Only	
Section 2	
Do you currently have regulations based on the UN "Orange Book" in operation in your economy?	
<input checked="" 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	
Regulatory instruments - What is the status of legislation / regulatory instruments for this sector?	
<input checked="" type="checkbox"/> Drafted	<input type="checkbox"/> Bills Passed <input type="checkbox"/> Proclaimed If proclaimed, date _____
If proclaimed, please provide a means of access to the Act e.g. web-link, contact person. If not, when do you expect it to be proclaimed?	
Transition – What is the timing for the transition in this sector?	
Begin <u>2011</u>	End <u>2012</u>
What arrangements will be made available for business in this phase?	
Not defined yet	
Extent - Do you intend to adopt all hazard classification building blocks GHS as per the purple book?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please indicate the cut-off points for mixtures you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please list the building blocks that will be adopted.	
Not defined yet	
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 overlaid on top of GHS classification on the label? If yes, how will it work?	

Labeling – Will each of the following elements be used on the label and SDS and is there to be a maximum number of the following included on the SDS and the label?

If there are no maximum numbers specified, please write "none" next to "Max" in the appropriate column.

Pictograms	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Signal words	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Hazard statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
Precautionary statements	Label	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____
	SDS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Max _____

How is the hierarchy of pictograms, hazard statements and precautionary statements defined?

Not defined yet

Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions ("deemed-to comply" provisions) and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?

Deemed-to comply provisions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Accept additional criteria	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Other arrangements <i>Please provide a full description</i>		

Do you have training and awareness activities planned? If yes, please provide some information.

For the year 2011, it is planned to develop awareness activities on GHS in Transport sector

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

Not for now

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?

Our norms have been based on the UN Orange Book for risk communication and classification, at ground transport of Hazardous Materials. Nonetheless, our laws are still too basic to cover the risk on transportation of hazardous materials.

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

As far as we know, GHS will only apply to the labeling, but not to the packing for transport purpose. This means that packages for transport, and trucks tanks, will use the same pictograms that are used today. The main impact could be in classifications, depending on how the state chooses to apply the GHS.

Please provide detail of the work required by industry to implement GHS / transport regulations, including information on how this workload may be reduced. (e.g. Classification and labeling of all products. This workload is more acceptable if spread over a long implementation period. Training of staff, which if coordinated by Government, will help industry.)

We believe that GHS implementation should not have important effects on hazardous materials transportation. In other words the UN Purple Book should not replace the Orange Book.

What are the expected benefits for industry through the implementation of GHS / transport regulations? Are there any risks that this benefit may not be achieved?

Improving regulations on transport will help the industry to compete on an even regulatory basis, because at that scenario, law will fix the minimum safety standard.

How can governments best help industry with the implementation of GHS / transport regulations?

We believe the transport regulations could be improved, by motivating self regulations and/or the implementation of management systems that covers those kinds of operations.

Maintaining GHS Principles and Objectives in Global Implementation Regional GHS Classification Lists

Governments across the globe have begun or will soon begin the process to implement the UN Globally Harmonized System for Classification and Labeling (GHS). For many regions, this process will be complicated and potentially costly, and efforts to ease problems in transition will be considered. But as governments and stakeholders weigh options to minimize potential complications, they should remain focused to maintaining the overall approaches and principles articulated in the GHS

The architects of the GHS recognized that changes to “national systems will be required to achieve a single globally harmonized system...” In their efforts to make these changes, some regions are publishing lists of GHS classifications for specific chemicals. Other groups are considering a global database for chemical classifications. There may be benefits to such lists, particularly for some small enterprises that may not have the resources necessary to re-classify their chemical products. Such companies may appreciate the opportunity to use a published classification list.

But governments should remain cognizant to the potential pitfalls of such lists. For example, it is almost certain that as different regions develop chemical classification lists, they will come to different conclusions on classifications for some chemicals. This outcome runs counter to the overall objective of the GHS – which is harmonization across the globe. In addition, regional chemical classification lists do not typically address potential impurities in chemical products. This is important because in some cases, it is the impurities that would typically drive the hazard classification.

If a region opts to move forward with a classification list, it should clearly state that adherence to the list is voluntary. This action would preserve the GHS objective of self-classification¹, which is stated in the GHS framework (Section 1.3.2.1.2):

One objective of the GHS is for it to be simple and transparent with a clear distinction between classes and categories in order to allow for “self classification” as far as possible. For many hazard classes the criteria are semi-quantitative or qualitative and expert judgment is required to interpret the data for classification purposes. Furthermore, for some hazard classes (e.g. eye irritation, explosives or self-reactive substances) a decision tree approach is provided to enhance ease of use. (emphasis added)

In order to provide the flexibility needed for self-classification, a region with a classification list should provide a mechanism that allows companies to classify their products differently if they have data to support that new classification.

Additionally, if a region moves forward with a GHS classification list, it should provide clear explanation of the data used for the classifications listed. It should also remain flexible and capable to quickly change classifications, as new data becomes available.

¹ As articulated in the GHS framework (Section 1.1.4.1), “The GHS is designed to permit self-classification.”