

Progress on the Implementation of GHS in APEC Economies
APEC Chemical Dialogue Virtual Working Group on GHS
May 2012

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. The APEC CD agreed to continue updating member economies on the GHS implementation progress through completion of the Template on an annual or biennial basis.

This 2012 report is the third report of the GHS implementation progress in APEC economies.

PROGRESS REPORT

Six APEC CD Member Economies - Australia, Chile, Chinese Taipei, Hong Kong, China, Japan, and Thailand - have returned the 2012 GHS Implementation Progress Reporting Template to the Virtual Working Group on GHS. The American Petroleum Institute (API) provided comments relevant to its industry sectors.

INDUSTRIAL WORKPLACE

As previously reported, this 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 challenges and concerns identified in the last report to the APEC CD for this sector were identified again for this report.

The main concern for this sector appears to be the discrepancies between economies implementation of GHS. While GHS allows certain choices 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, and differences in interpretation of mandatory and non-mandatory elements of GHS. e.g. precautionary statements. 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, with some economies providing information/resources only to local companies
2. Unknown and/or inconsistent international implementation schedule
3. Lack of international approach to building block adoption
4. Discrepancies in classification results depending on reference used/concerns over reliable sources of data
5. Contradiction of GHS with other local chemical regulations resulting in longer time than expected for local implementation of GHS
6. Training and expertise: Lack of experts to classify chemicals and conduct GHS training.
7. The need to build capabilities e.g. of local laboratories to conduct tests that may be needed to classify chemicals
8. Potentially high cost of implementation compared to expected benefits

The end-goal for GHS implementation, facilitation of trade resulting in reduction in transaction costs, appears to be an elusive goal. Without solutions for issues identified to date, implementation of GHS may not deliver the foreshadowed benefits.

CONSUMER:

Consideration of GHS implementation appears more difficult for the consumer product sector than for the workplace chemicals sector. Some 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, approaches to GHS varies.

There does not appear to be any consistency in adoption of GHS for APEC economies. Some economies are amending the existing regulatory framework to include elements of GHS. e.g. classification and/or hazard and precautionary statements (e.g. Australia), while others are implementing GHS fully (e.g. Thailand). Japan has indicated that GHS implementation for consumer products in Japan will be a voluntary initiative, relying on an industry Code of Practice. Some economies have indicated that they will not be implementing GHS for this sector (e.g. Hong Kong, China).

Currently most economies with established systems do not anticipate any significant benefits from GHS implementation.

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 to implement GHS has not yet been made,
- c) the decision has been taken but there are no details available on how and when the implementation will occur, or
- d) this section has been left blank.

The implementation of GHS in the Agricultural sector appears to be at odds with the "FAO/WHO Guidelines on Good Labeling Practice for Pesticide". Thailand commented that the FAO has stricter regulations than GHS. This is an issue that may require investigation before further implementation of GHS by APEC economies in this sector.

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

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 numbers 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 a past report can be carried forward.

2012 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 (UNSCGHS).

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.

Between 2010 and 2011, seven out of 21 member economies of the APEC CD, and an industry organisation completed the Template. Summary of implementation progress was compiled for APEC Ministers in 2009 and 2011 based on these responses.

With the finalisation of the 2009 report, 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.

Please provide the finalised template to Program Director or to Catherine Oh by 15 April 2012.

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	<input type="checkbox"/> No
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.	
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

<i>Regulator to complete</i>	
Do you intend to implement GHS for this sector?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If yes, please provide the following details. If no, no further answers are required for this section.</i>	
Lead Government Agency	Safe Work Australia
Contact person	Mr Martin Merrett
Phone number	+61 2 6240 3759
E-mail address	martin.merrett@safeworkaustralia.gov.au
Website	www.safeworkaustralia.gov.au
When do you plan to implement GHS for this sector?	
<p>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. As of 5 April 2012 five out of nine jurisdictions (including the Commonwealth) have implemented the new WHS laws incorporating the GHS for classification, labeling and SDS commencing on 1 January 2012. One jurisdiction will commence new laws on 1 January 2013. The remaining 3 jurisdictions are yet to announce implementation dates.</p>	
How long is the phase in period and what are the transition arrangements?	
<p>Five years.</p> <p>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. Both previous and GHS classification systems may be used during the transition period.</p> <p>The intent was that transition period commence in all States and Territories from 1 January 2012, and from 1 January 2017 only GHS is allowed. However, as not all States and Territories have adopted GHS on 1 January 2012, the end transition time for all States and Territories is uncertain.</p>	
Are the main relevant legislations implementing GHS finalized and in operation?	
<input checked="" type="checkbox"/> Yes – The Model Work Health and Safety legislation on which all State legislation are to be based is finalized. Not all States have implemented the Model Work Health and Safety legislation. <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?	
http://www.safeworkaustralia.gov.au/Legislation/Pages/ModelWHSLegislation.aspx	
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 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.	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	No
Hazard statements	No
Precautionary statements	No
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Pictograms and Hazard statements are both required to be on a label for products used in workplaces. Precautionary statements may be selected by the manufacturer. Guidance on labeling allows some precautionary statements to be omitted – recommends maximum 6 PS.	
Other information (eg. Risk-based advice for pesticides) may be present on the label in addition to workplace GHS requirements.	
Do you have any arrangements in place to deal with imported chemicals / products? 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, “deem-to-comply” provisions. All jurisdictions prior to implementation of the harmonized WHS laws amended legislation to accept GHS classified and labeled chemicals.	
The new WHS laws also allow additional GHS classifications to be communicated on labels	
Do you have training and awareness activities planned? If yes, please provide some information.	
Yes. Awareness and training materials are planned. Guidance on classification is available from the Safe Work Australia website. Other guidance to assist users understand labels and SDS is also available.	
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.	
Accommodating differing perspectives on chemical safety issues between industry, regulatory authorities and the general community.	
<i>Industry to complete</i>	
Has it been easy to access all necessary information for compliance?	
GHS rollout in Australia is still at an early stage. Industry is gaining experience with documentation provided by Safe Work Australia.	
Do you see any specific issues that are limiting the progress of GHS implementation?	
Australian States and Territories, EXCEPT the Australian Capital Territory, have made provision for acceptance of GHS classification and labeling. Industry has written to the	

regulator in the Australian Capital Territory expressing concern. The failure of the Australian Capital Territory to make provision for the acceptance of GHS classification and labeling creates technical non-compliances in industry's national adoption of GHS which could have ramifications for insurance and other matters beyond regulatory compliance. GHS classified and labeled chemicals imported from overseas which enter the Australian Capital Territory would also be non-compliant.

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

- **Training for awareness and new procedures**
- **Classification of chemicals/mixtures**
- **Preparation of GHS safety data sheets and labels**
- **Management of GHS and non-GHS labels and safety data sheets during transition; including customer inquiries and education**

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

A key question remains as to whether GHS will facilitate trade and reduce transaction costs.

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	The Department of Health and Ageing (Office of Chemical Safety) 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	Sarah Norris
Phone number	+61 2 6289 7883
E-mail address	sarah.norris@health.gov.au
Website	http://www.tga.gov.au/industry/scheduling.htm
When do you plan to implement GHS for this sector?	
Existing State/Territory Poisons Acts for poisons scheduling (health related classification and labelling) provide a suitable basis. Contacts for information and advice on legislative requirements can be found at http://www.tga.gov.au/industry/scheduling.htm. The Therapeutic Goods Act, 1989 and Regulations (Commonwealth) define poisons scheduling arrangements. The Act can be found via http://www.tga.gov.au/industry/scheduling-legislation.htm. Environmental elements may require a legislative basis.	
How long is the phase in period and what are the transition arrangements?	
Not applicable	
Are the main relevant legislations finalized?	
<input checked="" 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?	
Relevant main legislation can be found at: http://www.tga.gov.au/industry/scheduling-legislation.htm	
Do you intend to adopt all hazard classification building blocks GHS as is written in 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 describe 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?	
Risk assessment will be overlaid on top of GHS classification. Under the Therapeutic Goods	

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

Is there to be a maximum number of the following included on the SDS and the label?

Pictograms	Not applicable
Hazard statements	Not yet determined
Precautionary statements	As necessary

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

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

Do you have any arrangements in place to deal with imported chemicals / products? 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.

Not as yet, but may be initiated prior to implementation.

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

Exchange of personnel is not anticipated.

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?

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

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

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

At this point in time, industry is assuming that when workplace chemicals legislation refers to “consumer products” they capture all consumer products whether they are regulated as medicines or as agvet chemicals.

Most workplace chemicals are exempted from the Poisons Schedule requirement as can be seen in the introduction and Part 1 section 13 of the Poisons Schedule.

<http://www.comlaw.gov.au/Details/F2011L01612/Download>.

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

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.

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

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

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

Very little benefit is expected through the implementation of GHS. Australian consumer product regulations currently provide good public health and safety outcomes.

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

Agriculture

<i>Regulator to complete</i>	
Do you intend to implement GHS for this sector?	
<input checked="" type="checkbox"/> Yes – partial implementation GHS is partially implemented by default through implementation of GHS for workplace chemicals applying to agricultural chemicals in Australia. Although the Australian Pesticides and Veterinary Medicines Authority (APVMA) is the government agency that regulates agricultural and veterinary (agvet) chemicals, and approves particulars for their labels, the implementation of GHS labeling for agricultural chemicals is not regulated under legislation administered by the APVMA. Safe Work Australia, the agency responsible for implementing GHS for workplace chemicals, is also responsible for implementing some labeling elements of GHS (hazard and precautionary statements only) for agricultural chemicals.	<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	Safe Work Australia for GHS implementation, APVMA for other legislation regarding agvet chemicals.
Contact person	
Phone number	
E-mail address	
Website	www.apvma.gov.au; www.safeworkaustralia.gov.au
When do you plan to implement GHS for this sector?	
<p>There is no plan for full GHS implementation in the agvet chemicals sector.</p> <p>The timeline to add GHS hazard and precautionary statement on agricultural chemical labels will follow GHS implementation for workplace chemicals (see workplace chemicals section for further information).</p>	
How long is the phase in period and what are the transition arrangements?	
<p>The transition period to add GHS hazard and precautionary statement on agricultural chemical labels will follow GHS implementation for workplace chemicals. As discussed in the workplace chemicals section, the transition arrangements are a little unclear due to not all States in Australia implementing GHS at the same time (see workplace chemicals section for further information).</p> <p>For agricultural chemical product labels that were assessed since the APVMA labeling reform in 2011, WHS laws require the registrant to add GHS labeling elements to product labels.</p>	
Are the main relevant legislations finalized?	
<input checked="" type="checkbox"/> Yes – Same as workplace chemicals legislation for GHS labeling elements on agricultural chemicals. The Model Work Health and Safety legislation on which all State legislation are to be based is finalized. Not all States have implemented the Model Work Health and Safety legislation.	<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?	
<p>See Model Work Health and Safety Regulations 2011 (Cth) and equivalent State and Territory Regulations, Schedule 9, clause 10:</p> <p>http://www.safeworkaustralia.gov.au/AboutSafeWorkAustralia/WhatWeDo/Publications/Pages/Model-WHS-Regulations.aspx</p>	
Do you intend to adopt all hazard classification building blocks of 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. sensitisers. If no, please describe the building blocks that will be adopted.	
<p>Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.</p> <input type="checkbox"/> Yes <input checked="" 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>GHS information and risk assessment elements will be completely separate. Both sets of information will appear on the label.</p> <p>The APVMA undertakes a risk assessment for all agvet chemicals and must be satisfied that the label contains adequate instructions for safe and effective use before they are registered. The registration/authorisation is for specific uses set out on the label. The instructions for use, relevant hazard information and various other label content required by agvet chemical legislation (referred to as “relevant label particulars”) are approved by the APVMA as an outcome of the risk assessment.</p> <p>GHS labeling elements are additional to, and independent of, the relevant label particulars approved by the APVMA, and are added by the manufacturer following their self-assessment against the GHS criteria to meet the requirements of the new WHS legislation for workplace chemicals, described above.</p>	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	Not used for agvet chemicals, however pictograms to meet dangerous goods transport laws may be required.
Hazard statements	No
Precautionary statements	No
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
See workplace chemicals section.	
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. All imported agvet chemicals must be assessed and registered by the APVMA.	
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?

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

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

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

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

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

Indirect costs include:

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

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

Additional costs may also be incurred through creating labels with excessive numbers of hazard and precautionary statements that result in user confusion and consequently poorer risk management decisions. This may result in poorer workplace safety outcomes with associated additional costs.

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

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

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

Extending hazard information on labels (which is already required to be kept on workplace

SDSs) is not expected to provide any human health or workplace safety benefits. As noted above, there is a real risk that additional complexity and confusing labels may result in additional costs from poorer workplace safety outcomes.

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	State and territory governments are responsible for the land (road and rail) 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/
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 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 same UN Model Regulations.	
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.	
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.	
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 overlaid on top of GHS classification on the label? If yes, how will it work?	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or “deemed-to comply” provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
Industry to complete	
Has it been easy to access all necessary information for compliance?	
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.	

The Australian Regulations governing Transport of Dangerous Goods by Road and Rail lags behind international standard for implementation of the latest UNRTDG update, which hinders the harmonization process. This is partly due to the Australian Federation system where each State and Territory in Australia has to agree to the changes at a National level, then change the regulations at the State and Territory level. This is extremely time consuming and can result in a move away from international harmonization.

Governments can improve international harmonization of dangerous goods regulation by improving update mechanism and timeline, and providing information and training when these regulations are updated, with specific focus on the changes and the expected benefits of those changes.

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

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 is needed to ensure that unintended trade impediments are removed. 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 unless they are labeled to GHS. This is a unique Australian requirement which crosses regulatory boundaries between transport regulations and consumer product, workplace chemical and agricultural chemical regulations.

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

No new benefits are expected.

2012 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.

Between 2010 and 2011, seven out of 21 member economies of the APEC CD, and an industry organisation completed the Template. Summary of implementation progress was compiled for APEC Ministers in 2009 and 2011 based on these responses.

With the finalisation of the 2009 report, 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.

Please provide the finalised template to Program Director or to Catherine Oh by 15 April 2012.

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	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 uses the United Nations classification and is required for transport and from March 2011 will be for storage	

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	MINISTRY OF HEALTH
Contact person	PAMELA SANTIBÁÑEZ
Phone number	(56 2) 5740791
E-mail address	psantibanez@minsal.cl
Website	www.minsal.cl
When do you plan to implement GHS for this sector?	
Chile will begin to develop between March and April this year a National Implementation Strategy, which will include industry	
How long is the phase in period and what are the transition arrangements?	
It's not determinate	
Are the main relevant legislations implementing GHS finalized and in operation?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
Do you intend to adopt all hazard classification building blocks GHS as is written in the purple book?	
<input type="checkbox"/> Yes <input 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.	
It's not determinate	
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.	
It's not determinate	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
It's not determinate	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	No
Hazard statements	No
Precautionary statements	No
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
It's not define	
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?	
It's not define	
Do you have training and awareness activities planned? If yes, please provide some information.	
Chile won a SAICM Project for the implementation to the GHS. This project includes training and diffusion activities to all sectors involve.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	

It's not define

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

The main problem it's the laboratories capacity. Has been considered use the classification realizes for other countries, but for doubts or products without classification probably doesn't find the capacity to realize the classification.

Another difficulty is to improve the participation of organizations representing civil society

Industry to complete

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

2012: There are no advances on the implementation process in our country, even though there are 2 projects (that includes funds) form BID and SAICM. Chemical Sector, as a good practice, has started to inform to the industry about GHS, as its implementation is spreading in other economies that have similar or even more impact than Europe to Chilean Exportations, as it is the case of USA

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

2012:

1) The situation on government budget is still unclear and likely to have no assigned resources to GHS implementation in our country.

2) Some of the countries to with our economy have a higher level of trade; (both origin and destiny of hazmat) have no fully implemented GHS on their National levels. Nonetheless, this is starting to change, since important economies has announced the implementation timelines, which is suppose to drive the implementation on the rest of the economies. This leaves our country in a back position among APEC and OECD countries

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

2012:

COMMENT 1: There is no real estimation on actual costs, but those include not only the classification and labeling, but logistic, training and perhaps laboratory testing or payed access to studies already done are involved on the complete implementation process. Those costs can have an significant impact on commodities.

Comment 2: We put on the discussion those somehow hidden costs of not implementing GHS in our country yet, including misclassification and re-labeling of some exported or imported products.

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

2012: It will make easy the commerce between Chile and those countries that have started with GHS implementation.

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 HEALTH
Contact person	PAMELA SANTIBAÑEZ
Phone number	(56 2) 5740791
E-mail address	psantibanez@minsal.cl
Website	www.minsal.cl
When do you plan to implement GHS for this sector?	
It's not define	
How long is the phase in period and what are the transition arrangements?	
It's not define	
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 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.	
It's not define	
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.	
It's not define	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
It's not define	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	No
Hazard statements	No
Precautionary statements	No
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
It's not define	
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?	
It's not define	
Do you have training and awareness activities planned? If yes, please provide some information.	
Chile won a SAICM Project for the implementation to the GHS. This project includes training and diffusion activities to all sectors involve.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	

It's not define

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

The main problem it's the laboratories capacity. Has been considered use the classification realizes for other countries, but for doubts or products without classification probably doesn't find the capacity to realize the classification.

Another difficulty is to improve the participation of organizations representing civil society

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?

Agriculture

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

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

Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
<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 / 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?	

2012 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 (UNSCGHS).

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.

Between 2010 and 2011, seven out of 21 member economies of the APEC CD, and an industry organisation completed the Template. Summary of implementation progress was compiled for APEC Ministers in 2009 and 2011 based on these responses.

With the finalisation of the 2009 report, 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.

Please provide the finalised template to Program Director or to Catherine Oh by 15 April 2012.

General

Please provide the Economy for which this Template is completed below.	
Chinese Taipei (revision date: 2012/2/22, 2nd revision)	
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 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	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/
When do you plan to implement GHS for this sector?	
12/31/2008.	
How long is the phase in period and what are the transition arrangements?	
For the first stage of implementation: 12/31/2008 ~ 12/31/2009. For the second stage of implementation: 1/7/2011 ~ 12/31/2011.	
Are the main relevant legislations implementing GHS finalized and in operation?	
<input checked="" 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?	
Regulation of Labelling and Hazard Communication of Dangerous and Harmful Materials http://ghs.cla.gov.tw/common/download.ashx?type=file&SN=160	
Do you intend to adopt all hazard classification building blocks GHS as is written in 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 describe 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 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	No.
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 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, CLA has trained 276 instructors responsible for GHS awareness-raising and implementation in 2008. By December 2011, more than 100,000 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/>). GHS classification results of 3,000+ substances are provided for SME as reference. CLA is operating the APEC project G.R.E.A.T. website to provide GHS labeling elements in different languages.

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.

- **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?

- **Broad international implementation schedule**
- **Lack of international approach on building block approach**

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

Training, testing, classification, relabeling and redistribution

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

- **To improve protection of labors in workplace.**
- **International harmonized SDS and labelling elements to facilitate international trade.**

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 Economic Affairs (MOEA)
Contact person	
Phone number	
E-mail address	
Website	
When do you plan to implement GHS for this sector?	
In planning	
How long is the phase in period and what are the transition arrangements?	
In planning	
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 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.	
Not determined 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 determined yet.	
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.	
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?	
Not 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?	

Not determined yet.
Do you have training and awareness activities planned? If yes, please provide some information.
In planning
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.
Where 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.
What are the expected costs for industry in the implementation of GHS?
Training, testing, classification, relabeling and redistribution
What are the expected benefits for industry through the implementation of GHS?
<ul style="list-style-type: none"> ● International harmonized SDS and labelling elements to facilitate international trade. However, it could be a big uncertainty because international harmonization efforts are lacking in this sector, e.g. hazard or risk based approach.

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	Council of Agriculture (COA), Executive Yuan
Contact person	
Phone number	
E-mail address	
Website	http://pesticide.baphiq.gov.tw/ghs/ (Chinese only)
When do you plan to implement GHS for this sector?	
Pending on FAO and WHO harmonization work.	
How long is the phase in period and what are the transition arrangements?	
Pending on FAO and WHO harmonization work.	
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 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.	
Not determined 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 determined yet.	
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.	
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?	
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 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.
Several seminars and trainings are held every year to educating pesticide manufacturers importers and distributors .
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.
<i>Industry to complete</i>
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.
What are the expected costs for industry in the implementation of GHS?
Training, testing, classification, relabeling and redistribution
What are the expected benefits for industry through the implementation of GHS?
<ul style="list-style-type: none"> ● International harmonized SDS and labelling elements to facilitate international trade.

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 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	
When do you plan to implement GHS for this sector?	
Implemented	
How long is the phase in period and what are the transition arrangements?	
Implemented	
Are the main relevant legislations finalized?	
<input checked="" 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?	
In progress	
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 overlaid 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	No.
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 or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Deemed-to comply provisions.	
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)	
<i>Industry to complete</i>	
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.	
What are the expected costs for industry in the implementation of GHS / transport regulations?	
Training, testing, classification, labeling and distribution	
What are the expected benefits for industry through the implementation of GHS / transport regulations?	
● Harmonization among aviation, sea and land transportation	

2012 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.

Between 2010 and 2011, seven out of 21 member economies of the APEC CD, and an industry organisation completed the Template. Summary of implementation progress was compiled for APEC Ministers in 2009 and 2011 based on these responses.

With the finalisation of the 2009 report, 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.

Please provide the finalised template to Program Director or to Catherine Oh by 15 April 2012.

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 finalized. In the transport sector, certain local requirements will be harmonized with part of the GHS on hazard symbols of dangerous goods where appropriate. Please refer to the sections “industrial workplace” and “transport” for further information.]	<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	LAM Chi-hon
Phone number	(852) 2852 4067
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 overlaid 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
<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?

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 overlaid on top of GHS classification on the label? If yes, how will it work?	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	

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

Agriculture

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 overlaid on top of GHS classification on the label? If yes, how will it work?	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	

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

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 (excluding explosives) on land) Marine Department (for dangerous goods at sea) Civil Engineering and Development Department (for explosives on land)
Contact person	Mr. Patrick LEUNG Wai-hung (Fire Services Department) Mr. Ivan SHUEN Chi-keung (Marine Department) Dr. Clive FRANKS (Civil Engineering and Development Department) Dr. PANG Lok-sing (Create Hong Kong)
Phone number	852- 2733 7596 (Fire Services Department) 852- 2852 4538 (Marine Department) 852- 2716 8698 (Civil Engineering and Development Department) 852- 2294 2788 (Create Hong Kong)
E-mail address	icpolic2@hkfsd.gov.hk (Fire Services Department) ivanshuen@mardep.gov.hk (Marine Department) camfranks@cedd.gov.hk (Civil Engineering and Development Department) pangloksing@createhk.gov.hk (Create Hong Kong)
Website	http://www.hkfsd.gov.hk/ (Fire Services Department) http://www.mardep.gov.hk/ (Marine Department) http://www.cedd.gov.hk/ (Civil Engineering and Development Department) http://www.createhk-esela.gov.hk/eng/ (Create Hong Kong)
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.	
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 (excluding explosives) in Hong Kong, China (HKC). Subsidiary legislation of the Ordinance is under amendment and is anticipated to be completed in 2013. Under the amendment, classification and labeling systems of dangerous goods in HKC will be modeled on the International Maritime Dangerous Goods (IMDG) 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, Hong Kong Fire Services Department has no intention so far to implement GHS for land transport of dangerous	

goods or chemicals in HKC.

The Commissioner of Mines of the Civil Engineering and Development 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 explosives in HKC. Subsidiary legislation of the Ordinance is under amendment and is anticipated to be completed in 2013. Under the amendment, classification and labeling systems of dangerous goods in HKC will be modeled on the IMDG 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 Civil Engineering and Development Department has no intention so far to implement GHS for land transport of explosives in HKC.

The Marine Department of the Government of the Hong Kong Special Administrative Region is the authority under the Dangerous Goods Ordinance and the Merchant Shipping (Prevention and Control of Pollution) Ordinance to control the marine transport of dangerous goods in HKC, for which the IMDG Code for the classification and labeling of dangerous goods has been adopted. Hence the marine transport of dangerous goods in HKC is, in part, in harmony with the GHS on hazard symbols of dangerous goods.

The Head of Create Hong Kong of the Government of the Hong Kong Special Administrative Region is the authority under the Entertainment Special Effects Ordinance to control the transport of pyrotechnic special effects materials (PSEM) used in entertainment programmes and events. Classification and labelling systems of PSEM are modelled on the IMDG Code, and hence the transport of PSEM in HKC is harmonised with part of the GHS on hazard symbols of dangerous goods where appropriate.

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?

Yes 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?

Yes 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.

Yes 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 / 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?

2012 GHS Implementation Progress Reporting Template

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With the finalisation of the 2009 report, 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.

Please provide the finalised template to Program Director or to Catherine Oh by 15 April 2012.

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 labelinglabelling to reflected the 3rd revision of GHS Purple Book. In 2012, Japan integrated existing SDS and labelling JIS, and made new JIS Z 7253 reflected the 4th revision of GHS Purple Book. • The inter-ministerial committee decided to adopt risk-based labelinglabelling 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). • <u>PRTR Law (METI) and the Industrial Safety and Health Act (under the jurisdiction of MHLW) stipulate the way to provide provision of information (e.g. SDS and labelling) on hazardous chemicals. In 2012, METI and MHLW have revised related ordinances and guideline to make conform with GHS.</u> <u><Summary of revision of PRTR Law></u> <u>-The information which is required in SDS will expand to 16 headings as GHS.</u> <u>-Labelling will become effort-obligation.</u> <u>-Japanese Industrial Standard (JIS) Z7253 which covers Labelling and SDS will become effort-obligation to follow. etc.</u> <u><Summary of revision of ISHL ></u> <u>-SDS and labeling of chemicals were expanded as effort-obligation basis as of 1 April 2012;</u> <u>-JIS Z7253 is recommended as an example to comply with the amended ordinance.</u> 	
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?

- **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_download.html)

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	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/
When do you plan to implement GHS for this sector?	
Relevant legislation has already proclaimed, Oct. 20, 2006.	
How long is the phase in period and what are the transition arrangements?	
From December 2006 to December 2008	
Are the main relevant legislations implementing GHS finalized and in operation?	
<input checked="" 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?	
Web-link (http://www.mhlw.go.jp/topics/bukyoku/roudou/ghs/index.html)	
Do you intend to adopt all hazard classification building blocks GHS as is written in 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 describe the building blocks that will be adopted.	
Cut-off values are listed for 104 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 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	None
Hazard statements	None
Precautionary statements	None
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 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?
No
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?

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	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/
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?
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.
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.
It is easy to access the information for an expert of GHS in Japan.
Do you see any specific issues that are limiting the progress of GHS implementation?
Lack of experts to classify and label consumer products, especially in SMEs
What are the expected costs for industry in the implementation of GHS?
<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?
<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 this sector.</i>	
Lead Government Agency	Ministry of Agriculture, Forestry, and Fisheries Ministry of Agriculture, Forestry, and Fisheries
Contact person	Mr. Tomohiro ISHIOKA Mrs. Chiemi SAITO Mr. Tomohiro ISHIOKA Mr. Sadami SUZUKI
Phone number	+81-3-3501-3767 +81-3-3501-3767
E-mail address	ghs-agri@nm.maff.go.jp ghs-agri@nm.maff.go.jp
Website	http://www.maff.go.jp/ http://www.maff.go.jp/
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"	
<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 labelinglabelling 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 labelinglabelling systems of dangerous goods by the ICAO-TI are consistent with them of the UN "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. sensitisers. If no, please describe the building blocks that will be adopted.			
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.			
<input type="checkbox"/> Yes		<input type="checkbox"/> No	
If yes, please provide full details of non-GHS criteria being considered for adoption.			
Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?			
Is there to be a maximum number of the following included on the SDS and the label?			
Pictograms			
Hazard statements			
Precautionary statements			
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?			
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or “deemed-to comply” provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?			
Do you have training and awareness activities planned? If yes, please provide some information.			
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?			
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.			
<i>Industry to complete</i>			
Has it been easy to access all necessary information for compliance?			
Do you see any specific issues that are limiting the progress of GHS implementation / 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?			

2012 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 (UNSCGHS).

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.

Between 2010 and 2011, seven out of 21 member economies of the APEC CD, and an industry organisation completed the Template. Summary of implementation progress was compiled for APEC Ministers in 2009 and 2011 based on these responses.

With the finalisation of the 2009 report, 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.

Please provide the finalised template to Program Director or to Catherine Oh by 15 April 2012.

GHS REPORTING TEMPLATE

COUNTRY : THAILAND

General

Please provide the Economy for which this Template is completed below.	
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.	
PLEASE CONTACT FOOD AND DRUG ADMINISTRATION. THIS IMPLEMENTATION PROJECT IS	
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	FOOD AND DRUG ADMINISTRATION / DEPARTMENT OF INDUSTRIAL WORKS
Name	
Phone number	/ DEPARTMENT OF TRANSPORT
E-mail address	
Website	
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?	
FOR INFORMATION AND REFERENCE. IT IS THE LIST OF 500 SUBSTANCES UNDER THE HAZARDOUS SUBSTANCES	

THE ACCESS IS THROUGH PUBLIC WEB SITE.

UNDER UNITAR/FD
CO-OPERATION,
/DEPARTMENT OF
AGRICULTURE

(DIW)

Industrial Workplace

Regulator to complete	
Do you intend to implement GHS for this sector?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide the following details. If no, no further answers are required for this section.	
Lead Government Agency	DEPARTMENT OF INDUSTRIAL WORKS (HAZARDOUS SUBSTANCES BUREAU)
Contact person	(DIW)
Phone number	
E-mail address	
Website	www.diw.go.th
When do you plan to implement GHS for this sector?	
NOTIFICATION HAS BEEN ENFORCED ON 12 MAR 2012	
How long is the phase in period and what are the transition arrangements?	
1 YEAR FOR SINGLE SUBSTANCES, 5 YEARS FOR MIXTURES	
Are the main relevant legislations implementing GHS finalized and in operation?	
<input checked="" 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?	
PUBLIC HEARING & ACCESS THROUGH WEB SITE	
Do you intend to adopt all hazard classification building blocks GHS as is written in 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 describe the building blocks that will be adopted.	
FOR INDUSTRIAL CHEMICALS, DIW WILL ADOPT THE 'HIGHER' CUT-OFF POINTS	
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?	
AT THE MOMENT, 'NO'	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	NO: TO THE MAXIMUM NUMBER AS GHS REQUIRES.
Hazard statements	NO: TO THE MAXIMUM NUMBER AS GHS REQUIRES.
Precautionary statements	NOT REQUIRED BY REGULATION, CONSIDERED AS OPTIONAL.
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
NO DEFINED HIERARCHY. SEQUENCE SHOULD BE BY GHS (PICTOGRAMS/SIGNAL WORD/ HAZARD STATEMENT)	
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?	
PENDING	
Do you have training and awareness activities planned? If yes, please provide some information.	
YES, A NUMBER OF TRAININGS HAVE BEEN ORGANIZED BY BOTH GOVERNMENT AND PRIVATE SECTORS	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	

CAPACITY BUILDING HAS BEEN CARRIED OUT SINCE TRAINING PERIOD WITH JCIA (JAPAN CHEMICAL INDUSTRY ASSOCIATION)	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
DIFFERENT RESULT OF CLASSIFICATION / NO HARMONIZED DATABASE FOR SINGLE SUBSTANCES	CLASSIFICATION.
<i>Industry to complete</i>	
Has it been easy to access all necessary information for compliance?	
IT IS NOT EASY TO ACCESS NECESSARY INFORMATION ESPECIALLY FINDING/SCREENING	FOR RELIABLE INFORMATION.
Do you see any specific issues that are limiting the progress of GHS implementation?	
THERE IS CERTAIN LOOPHOLE FOR NUMBERS OF CHEMICAL COVERAGE. NOW ONLY UNDER HAZARDOUS SUBSTANCES REQUIRE COMPLIANCE.	
What are the expected costs for industry in the implementation of GHS?	
CANNOT FORESEE AND ESTIMATE	
What are the expected benefits for industry through the implementation of GHS?	
HARMONIZED LABELS AND SDS - IMPROVED HAZARD COMMUNICATION.	
	-LIMITED KNOWLEDGE OF INDUSTRY ON TOXICITY AND ECO-TOXICITY.

Consumer Products

Regulator to complete	
Do you intend to implement GHS for this sector?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide the following details. If no, no further answers are required for this sector.	
Lead Government Agency	FOOD AND DRUG ADMINISTRATION (FDA)
Contact person	
Phone number	
E-mail address	
Website	WWW.FDA.MOPH.GO.TH
When do you plan to implement GHS for this sector?	
NOTIFICATION DRAFT HAS BEEN FINALIZED. NOW WAITING TO BE RELEASED.	
How long is the phase in period and what are the transition arrangements?	
1 YEAR FOR SINGLE SUBSTANCES, 5 YEARS FOR MIXTURES.	
Are the main relevant legislations finalized?	
<input checked="" 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?	
PUBLIC HEARING & ACCESS THROUGH WEB SITE.	
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.	
FOR CONSUMER CHEMICALS, FDA WILL ADOPT THE 'LOWER' CUT-OFF POINTS	
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?	
STUDY HAS BEEN DONE BUT IMPLEMENTATION IS STILL PENDING.	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	NO: TO THE MAXIMUM NUMBER AS GHS REQUIRES.
Hazard statements	NO: TO THE MAXIMUM NUMBER AS GHS REQUIRES.
Precautionary statements	NOT REQUIRED BY REGULATION, CONSIDERED AS OPTIONAL.
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
NO DEFINED HIERARCHY. SEQUENCE SHOULD BE BY GHS (PICTOGRAMS/SIGNAL WORD/HAZARD STATEMENT)	
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?	
PENDING	
Do you have training and awareness activities planned? If yes, please provide some information.	
YES, A NUMBER OF TRAININGS HAVE BEEN ORGANIZED BY BOTH GOVERNMENT AND PRIVATE SECTORS.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	

CAPACITY BUILDING HAS BEEN CARRIED OUT SINCE TRAINING PERIOD WITH UNITAR .	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
DIFFERENT RESULT OF CLASSIFICATION / NO HARMONIZED DATABASE FOR SINGLE <i>Industry to complete</i>	SUBSTANCES CLASSIFICATION .
Has it been easy to access all necessary information for compliance?	
IT IS NOT EASY TO ACCESS NECESSARY INFORMATION ESPECIALLY FINDING/SCREENING	FOR RELIABLE INFORMATION .
Do you see any specific issues that are limiting the progress of GHS implementation?	
THERE IS CERTAIN LOOPHOLE FOR NUMBERS OF CHEMICAL COVERAGE . NOW ONLY UNDER	HAZARDOUS SUBSTANCES
What are the expected costs for industry in the implementation of GHS?	REQUIRE COMPLIANCE .
CANNOT FORESEE AND ESTIMATE .	
What are the expected benefits for industry through the implementation of GHS?	
HARMONIZED LABELS AND SDS - IMPROVED HAZARD COMMUNICATION	-LIMITED KNOWLEDGE OF INDUSTRY ON TOXICITY AND ECO-TOXICITY.

Agriculture

Regulator to complete	
Do you intend to implement GHS for this sector?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide the following details. If no, no further answers are required for this sector.	
Lead Government Agency	DEPARTMENT OF AGRICULTURE
Contact person	
Phone number	
E-mail address	
Website	WWW.DOA.GO.TH
When do you plan to implement GHS for this sector?	
NOW PENDING. WAITING FOR THE DISCUSSION RESULT BETWEEN FAO AND GHS FOR IMPLEMENTATION	
How long is the phase in period and what are the transition arrangements?	
1 YEAR FOR SINGLE SUBSTANCES, 5 YEARS FOR MIXTURES.	
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.	
NOT YET DEFINED.	
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	PENDING
Hazard statements	PENDING
Precautionary statements	PENDING
NEED TO SEE WHEN COMPARED WITH CURRENT SYSTEM BY FAO.	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
PENDING	
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?	
PENDING	
Do you have training and awareness activities planned? If yes, please provide some information.	
YES A NUMBER OF TRAININGS HAVE BEEN ORGANIZED.	
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.
FAO HAS STRICTER REGULATIONS WHEN COMPARED TO 'GHS'
<i>Industry to complete</i>
Has it been easy to access all necessary information for compliance?
LIMITED ACCESS TO RELIABLE INFORMATION.
Do you see any specific issues that are limiting the progress of GHS implementation?
FAO LABELING SYSTEM IN COMPARISON WITH GHS
What are the expected costs for industry in the implementation of GHS?
COST FOR LABEL CHANGE / SIGNIFICANT COST
What are the expected benefits for industry through the implementation of GHS?
HARMONIZED LABELS AND SDS - IMPROVED HAZARD COMMUNICATION,

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 checked="" type="checkbox"/> Implement GHS based on the UN "Purple Book"	
<input type="checkbox"/> No, do not intend to implement GHS	
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.	
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	
Phone number	
E-mail address	
Website	WWW. MOT. GO.TH
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.	
NOW NO LEGISLATION HAS NOT BEEN IN PLACE. PRACTICE ACCORDING TO GHS HAS BEEN PROVIDED AS GUIDELINE FOR INDUSTRY AND TRANSPORT SECTOR.	
Section 3	
When do you plan to implement GHS for this sector?	
NO PLAN FOR CONCRETE LEGISLATION	
How long is the phase in period and what are the transition arrangements?	
NO DETAIL YET	
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 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 describe the building blocks that will be adopted.	
ACCORDING TO AUTHORITIES IN CHARGE SUCH AS DIW, FDA, DOA	
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	} ACCORDING TO AUTHORITIES IN CHARGE SUCH AS DIW, FDA, DOA
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
ACCORDING TO AUTHORITIES IN CHARGE.	
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?	
PENDING.	
Do you have training and awareness activities planned? If yes, please provide some information.	
YES A NUMBER OF TRAININGS PROVIDED.	
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.	
DEPENDS ON INDUSTRY.	
Industry to complete	
Has it been easy to access all necessary information for compliance?	
NO GHS INFORMATION AVAILABLE FOR SPECIFIC TRANSPORT SECTOR. MAINLY FOR INDUSTRY.	
Do you see any specific issues that are limiting the progress of GHS implementation / transport regulation?	
TRANSPORT SECTOR STILL HAS LIMITED KNOWLEDGE ABOUT GHS. MORE TRAININGS ARE REQUIRED.	
What are the expected costs for industry in the implementation of GHS / transport regulations?	
MAINLY ON TRAINING FOR TRANSPORT SECTOR	
What are the expected benefits for industry through the implementation of GHS / transport regulations?	
HARMONIZED UNDERSTANDING - IMPROVED HAZARD COMMUNICATION	

General

Please provide the Economy for which this Template is completed below.	
Completed on the United States (U.S.) by the American Petroleum Institute (API) on <u>April 15, 2012.</u>	
Does your Economy intend to adopt and implement GHS for any chemical sector in the near future (Starting work within the next 2 years)? The U.S. transportation sector has already adopted and implemented the GHS. OSHA has just published the final GHS rule for the industrial/workplace sector on March 26, 2012 and implementation is now starting.	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If yes, go to next question. If no, no further answers are required.</i>	
Is there an overall strategic plan for GHS implementation? Each U.S. agency/sector has its own statutory authorities and implementing regulations. Each agency/sector will develop its own GHS implementation plan.	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, where can it be found? Please list websites, attach documents, etc.	
Do you have a GHS coordinator to facilitate implementation discussions within your economy? The U.S. coordinates GHS implementation through an interagency committee.	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Environmental Protection Agency (EPA); Occupational Safety and Health Administration (OSHA); Department of Transportation (DOT); Consumer Product Safety Commission (CPSC)
Name	Interagency Coordinating Group on Harmonization Contact: Maureen Ruskin/OSHA
Phone number	1-202-693-1955
E-mail address	Ruskin.Maureen@dol.gov
Website	http://www.osha.gov/dsg/hazcom/index.html
Do you have a hazard classification database?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, is it mandatory classification, or for information only? How do you access the database?	
U.S. DOT uses the UN Orange Book classification list as a basis for its HMT table/list.	

Industrial Workplace

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

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

Industry to complete

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

OSHA has just published the requirements to implement the GHS on March 26, 2012. So far OSHA has not routinely held meetings to obtain stakeholder input prior to UNSCEGHS meetings which will impact future GHS revisions as well as OSHA Hazard Communication Standard (HCS) revisions.

Global Industrial Workplace Issues:

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

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

Sometimes implementation dates are published, but the related implementing regulations are not yet finalized, or the regulations are finalized but the transition period and implementation dates are not clear.

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

- To achieve the goal of harmonization and reap the associated benefits, OSHA/governments should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries. The OSHA final GHS rule is generally aligned with the GHS, but there are several issues that are not aligned, e.g., mandatory precautionary statements.**
- Collaboration is needed among the U.S. Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the GHS final rule. However, EPA and CPSC are not making progress in implementing the GHS. CPSC has stated that GHS implementation is on hold due to other priorities. The recent International Maritime Organization (IMO)/Coast Guard activities related to SDSs do not promote global harmonization and a consistent SDS format.**

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

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

Costs for industry can be reduced by the following:

- To achieve the goal of harmonization and reap the associated benefits, OSHA/governments should align the HCS with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries.**
- OSHA/governments should be as consistent as possible with European Union (EU) GHS**

implementation and the GHS as negotiated at the UN, especially for hazard classes/categories for mixture cut-off values/concentration limits and for the effective dates and transition periods.

- **Manufacturers should be allowed to use their own precautionary statements in addition to the precautionary statements in the GHS, which should be non-binding suggestions.**

API suggests providing at least the following assistance materials:

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

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

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

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

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

The costs for industry can be reduced by the following:

- **GHS must be implemented comprehensively and consistently across industries on a global basis.**
- **Governments should work closely with each other to ensure alignment to the UN-endorsed version of the GHS and to minimize country-specific deviations.**
- **OSHA/governments need to ensure and set forth a process for U.S. stakeholder input into future GHS technical decisions to be made through negotiations at the UN Sub-Committee of Experts on the GHS (UNSCEGHS).**
- **OSHA/governments should support sector-specific guidance, including providing web links to relevant documents.**
- **Manufacturers should be allowed to use their own precautionary statements in addition to the precautionary statements in the GHS, which should be non-binding suggestions.**

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

Consumer Products

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

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

Industry to complete

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

The GHS has not yet been implemented by the CPSC in the U.S. for consumer products. Information on the progress/status is not readily available to stakeholders.

Global Issues:

It is not always possible to keep up to date and find the necessary GHS compliance information from some APEC economies. Also, it is not always easy to understand which sectors are covered by the implementing regulations/legislation/standards. Some countries/economies have restricted access to regulations, information and/or websites to domestic companies only. This is contrary to the objectives of the GHS.

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

Sometimes implementation dates are published, but the related implementing regulations are not yet finalized, or the regulations are finalized but the transition period and implementation dates are not clear.

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

- **For consumer products, the use of risk-based labeling for chronic effects could be an implementation issue.**
- **To achieve the goal of harmonization and reap the associated benefits, governments should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries.**
- **Collaboration is needed among Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the final GHS rule. However, EPA and CPSC are not making progress in implementing the GHS. CPSC has stated that GHS implementation is on hold due to other priorities. The recent IMO/Coast Guard activities related to SDSs do not promote global harmonization and a consistent SDS format.**

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

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

Costs for industry can be reduced by the following:

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

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

Expected benefits for industry through the implementation of GHS include:

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

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

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

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

Agriculture

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

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

Industry to complete

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

The U.S. EPA has not yet implemented the GHS for agricultural chemicals. The GHS information on the U.S. EPA website and in EPA presentations has been informative but has not been updated recently.

Global Issues:

It is not always possible to keep up to date and find the necessary GHS compliance information from some APEC economies. Also, it is not always easy to understand which sectors are covered by the implementing regulations/legislation/standards. Some countries/economies have limited access to regulations, information and/or websites to domestic companies only. This is contrary to the objectives of the GHS.

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

Sometimes implementation dates are published, but the related implementing regulations are not yet finalized, or the regulations are finalized but the transition period and implementation dates are not clear.

In the case of pesticides, the FAO and WHO pesticide publications should be readily available on-line.

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

- GHS implementation for the labelling of agricultural pesticides is still at an early stage world-wide. For pesticides, the inclusion of GHS information in the *FAO Guidelines on Good Labelling Practice for Pesticides*, the *FAO Guidelines on Pesticide Registration* and *WHO Recommended Classification of Pesticides* publication is a consideration for GHS implementation. The use of risk-based labeling could also be an implementation issue.
- To achieve the goal of harmonization and reap the associated benefits, governments should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries.
- Collaboration is needed among Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the GHS final rule. However, EPA and CPSC are not making progress in implementing the GHS. CPSC has stated that GHS implementation is on hold due to other priorities. The recent International Maritime Organization (IMO)/Coast Guard activities related to SDSs do not promote global harmonization and a consistent SDS format.

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

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

Costs for industry can be reduced by the following:

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

- **FAO/WHO information on pesticides that is aligned with the GHS should be developed.**

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

Expected benefits for industry through the implementation of GHS include:

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

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

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

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

Transport

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

Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
Industry to complete	
Has it been easy to access all necessary information for compliance?	
<p>U.S. DOT has implemented the GHS.</p> <p>There have been no issues accessing the necessary compliance information from the U.S. DOT. U.S. DOT routinely holds stakeholder meetings prior to the UNSCETDG meetings in Geneva to obtain stakeholder input.</p> <p>U.S. Coast Guard / IMO SDS Information regarding the implementation of the IMO "Recommendations for Material Safety Data Sheets (MSDS) for MARPOL Annex I Oil Cargo and Oil Fuel" (Resolution MSC.286(86)) has not been readily available from the U.S. Coast Guard. Also the information on how the IMO SDS resolution is being implemented globally is not readily available.</p>	
Do you see any specific issues that are limiting the progress of GHS implementation / transport regulation?	
<ul style="list-style-type: none"> • To achieve the goal of harmonization and reap the associated benefits, governments/organizations should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries/organizations. • Collaboration is needed among Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the final GHS rule. However, EPA and CPSC are not making progress in implementing the GHS. CPSC has stated that GHS implementation is on hold due to other priorities. The recent International Maritime Organization (IMO)/Coast Guard activities related to SDSs do not promote global harmonization and a consistent SDS format. <p>U.S. Coast Guard / IMO SDS Lack of agreement by the IMO and UNSCEGHS about the IMO SDS and how to harmonize IMO Resolution MSC.286(86) with the GHS SDS format is limiting progress.</p>	
What are the expected costs for industry in the implementation of GHS / transport regulations?	

U.S. Coast Guard / IMO SDS

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

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

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

U.S. Coast Guard / IMO SDS

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