

Progress on the Implementation of GHS in APEC Economies
APEC Chemical Dialogue Virtual Working Group on GHS
March 2013

HISTORY

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 the need for capacity building.

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

This 2013 report is the fourth report of the GHS implementation progress in APEC economies.

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

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

*These economies have provided both government and industry response in some reports, and industry responses only in others.

[#]Only the general information section was completed.

PROGRESS REPORT

In total, there are seven completed and partially completed GHS reporting templates for analysis for this report. Four APEC CD Member Economies - Australia, Chinese Taipei, Hong Kong, China and Japan - have returned the 2013 GHS Implementation Progress Reporting Template to the Virtual Working Group on GHS. Thailand returned a partially completed report – Industrial Workplace and Transport sections were missing from the report. The American Petroleum Institute (API) provided its perspective on GHS implementation for each of the sectors. Indonesia completed the 2012 template late last year and has been included in this report.

Industrial Workplace

As previously reported, this sector appears to be the focal point for implementation of GHS. All economies have reported that the GHS implementation for industrial workplace is progressing ahead of implementation of other sectors. In the case of Hong Kong, China, and Japan, Industrial Workplace is the only sector that will implement GHS.

Facilitation of international trade and improved workers' health were identified as the main benefits from GHS implementation.

The challenges and concerns identified in this report mirrors the challenges raised in previous reports.

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, divergent versions of GHS are being implemented globally. There are also concerns that differences can arise between the GHS classifications used in different economies which also potentially leads to divergence in GHS labelling. Where classification databases are maintained by governments in economies, they can at times be treated as mandatory classification which can exacerbate the issue.

Training and capacity building is also emerging as a major issue for some economies. The lack of experts with understanding of GHS has been flagged as an issue particularly for SMEs, as well as the lack of government inspectors with understanding of GHS to enforce compliance.

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 schedules,
3. Lack of international approach to building block adoption,
4. Discrepancies in classification results depending on references used/concerns over reliable sources of data,
5. Conflict between GHS and 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, and
8. Potentially high cost of implementation compared to expected benefits.

One of the end-goals for GHS implementation, facilitation of trade resulting in reduction in transaction costs, may become an elusive goal without solutions for issues identified to date.

Consumer

GHS implementation appears more difficult for the consumer products sector than for the workplace chemicals sector. Most economies have reported that GHS is being considered for

implementation for the consumer products sector, only Thailand and Indonesia have finalised legislation for implementation of GHS. Further, in the case of Thailand, GHS implementation will only apply to a sub-section of consumer products (only consumer products under the *Hazardous Substances Act 1992*).

One of the concerns raised with respect to the implementation of GHS for consumer products is that there does not appear to be any consistency in economies' approaches to adoption of GHS globally. Inconsistency in GHS implementation for this sector is reflected in the GHS reporting templates submitted by 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. Indonesia). 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).

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

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

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

As the GHS implementation for this sector is not consistent or global, benefits from facilitation of international trade is also not expected. Further, for consumer products, it is unlikely that a single label would be acceptable for all APEC economies due in part to language differences, cultural preferences and other local regulatory requirements.

Agriculture

Similar to the Consumer Products sector, the GHS implementation for the Agricultural sector also appears uncertain. Some economies have indicated that they will be implementing GHS for the Agricultural sector (e.g. Thailand and partially for Australia) while some economies are waiting for FAO/WHO harmonisation work (e.g. Indonesia and Chinese Taipei). Other economies have stated that they will not be adopting GHS for this sector (e.g. Japan and Hong Kong, China).

The common thread emerging appears to be that most economies are waiting for WHO/FAO decisions. Currently the WHO/FAO labelling appears to be the internationally accepted labelling for agricultural pesticides.

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

Transport

As previously reported, 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.

SUMMARY AND DISCUSSION

While the implementation of GHS is progressing in the APEC region, its progress appears to be impeded for a number of reasons. There are different reasons for each of the sectors, and consideration of any solutions should consider the individual sectors separately.

It is apparent that the greatest benefit from GHS implementation would be derived from the Industrial Workplace sector. Most of the APEC economies are planning to implement GHS for this sector and many already have legislations in place.

While there are a number of issues identified in the implementation, there are three major hurdles. They are the:

1. Divergence in classification leading to different labels from different economies,
2. Need for capacity building, and
3. Different building blocks/approaches adopted by different economies.

APEC could have a significant role in addressing these issues.

For example, there have been numerous discussions in different fora for harmonising the classification of chemicals. This is a time consuming and costly process which ignores the GHS principle of self-classification. APEC CD could reiterate the GHS principle of self-classification, and recommend that any classification database maintained by APEC economies be for information only i.e. not mandatory classification.

It is apparent that there are several APEC economies that are already building capacity for GHS implementation, while others are struggling. APEC CD may wish to consider different ways to leverage expertise available in some of the APEC economies to build capacity for the APEC region.

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

However, once APEC economies implement GHS and have more experience with the system, APEC CD could play a role in encouraging convergence in the adoption of building blocks and implementation approaches within APEC.

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

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

It is also worth noting the work of the Virtual Working Group on Consumer Products, a sub-group of the APEC CD. This Virtual Working Group explored challenges faced by different economies in implementing GHS, and compiled case studies to aid APEC economies considering GHS implementation for this sector.

The implementation of GHS for the Agricultural sector also does not appear to be progressing. However, as the agricultural pesticide labels already appear to be harmonised based on the FAO/WHO criteria, it is pragmatic for this sector to look to the FAO/WHO harmonisation work before considering any further implementation of GHS.

The transport sector is relatively unaffected by the implementation of GHS as the implementation of GHS in this sector is largely effected at the UN level, where the UN GHS classifications and the UNRTDG classifications are aligned where relevant and as far as possible. There is no discussion on whether labelling elements of GHS should be adopted for transport.

The international regulation of hazards posed by chemicals during transport is and has long been addressed by the adoption of UNRTDG, and it is unlikely that we will see a move towards wholesale adoption of GHS in this sector.

It is also recommended that the future GHS reports remove the transport section, as this is peripheral to the implementation of GHS at large.

RECOMMENDATIONS

It is recommended that the APEC CD:

1. Reiterate the GHS principle of self-classification and recommend that any GHS classification databases maintained by APEC economies be for information only, and not as sources of mandatory classification.
2. Consider different ways of leveraging expertise available in some APEC economies to build GHS capacity for the APEC region.
3. Agree to remove the Transport sector report from future GHS implementation reports.

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
<p>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.</p>	
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 overlayed 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 may 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	Lead Government Agency
Contact person	Contact person
Phone number	Phone number
E-mail address	E-mail address
Website	Website
When do you plan to implement GHS for this sector?	
<p>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.</p>	
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?	
<p>Relevant main legislation can be found at: http://www.tga.gov.au/industry/scheduling-legislation.htm</p>	
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.	
<p>These remain under consideration. However, it is desirable that there be integration with existing requirements so as to minimise disruption to existing classification arrangements.</p>	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No – to be determined
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>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.</p>	

Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	Pictograms
Hazard statements	Hazard statements
Precautionary statements	Precautionary statements
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?	
<p>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.</p> <p>http://www.health.gov.au/internet/main/publishing.nsf/Content/7FE108F56018FC1DCA2575910011D11E/\$File/GHS%20Discussion%20Paper_Final%20Draft%20for%20Approval_16%20March%202009.pdf.</p>	
Do you see any specific issues that are limiting the progress of GHS implementation?	
<p>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 <i>Therapeutic Goods Act 1989</i> (Cth) and some as agvet chemicals (e.g. household pesticides and herbicides) under the <i>Agricultural and Veterinary Chemicals Code Act 1994</i>.</p> <p>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.</p> <p>Industry has attempted work through this inconsistency at the drafting stage of workplace chemicals legislation with some success, but unfortunately ambiguity still remains.</p>	

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. However, no work has progressed by DoHA since the initial proposal in 2009.

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

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

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 <p>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.</p>	<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?

See *Model Work Health and Safety Regulations 2011 (Cth)* and equivalent State and Territory Regulations, Schedule 9, clause 10:

<http://www.safeworkaustralia.gov.au/AboutSafeWorkAustralia/WhatWeDo/Publications/Pages/Model-WHS-Regulations.aspx>

Do you intend to adopt all hazard classification building blocks of 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. 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.

Yes No

If yes, please provide full details of non-GHS criteria being considered for adoption.

Will there be a risk assessment element overlaid on top of GHS classification on the label? If yes, how will it work?

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

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

GHS 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.

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.
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Hazard statements	No
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Precautionary statements	No
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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.
<i>Industry to complete</i>
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: <ul style="list-style-type: none"> • 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	Lead Government Agency
Contact person	Contact person
Phone number	Phone number
E-mail address	E-mail address
Website	Website
Only	
Section 2	
Do you currently have regulations based on the UN “Orange Book” in operation in your economy?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, is this transport sector regulation compatible with GHS? Please explain how the interface between GHS and UN “Orange Book” based regulation works. If no, please provide the details of the implementation plan. Please provide links to relevant legislation, draft legislation and/or other regulatory information.	
<p>The Australian Code for the transport of dangerous goods (by road & rail) and the associated model legislation are based on the United Nations Recommendations on the Transport of Dangerous Goods – Model Regulations. The regulations for air and sea transport of dangerous goods in Australia adopt the international air and sea transport codes for dangerous goods which are also based on the same UN Model Regulations.</p> <p>These regulatory frameworks are compatible with the GHS through their adoption of the UN model regulations, given that the UN model regulations are aligned as far as possible with the provisions in the GHS and it has been agreed that any subsequent editions of the UN Model Regulations will continue to adopt all relevant GHS requirements.</p> <p>Accordingly, dangerous goods transport regulation in Australia effectively incorporate provisions from the GHS, via the UN Model Regulations, and will continue to do so in future revisions. This ensures a consistent approach to the GHS by all transport modes for the transport of dangerous goods.</p>	
Section 3	
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	Pictograms
Hazard statements	Hazard statements
Precautionary 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 <i>Australian Code for the Transport of Dangerous Goods by Road and Rail (ADG Code)</i> 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 United Nations Sub-Committee of Experts on Transport of Dangerous Goods (UNSCETDG) and United Nations Sub-Committee of Experts on the Globally Harmonised System of Classification and Labelling of Chemicals (UNSCGHS) 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.

General

Please provide the Economy for which this Template is completed below.	
Chinese Taipei (revision date: 2013/2/23, 3rd 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.	
<p>See scheme of National GHS Implementation 3-year Action (FY2006-FY2008) attached and website (http://ghs.cla.gov.tw/) for details.</p> <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 <p>Revision of CNS15030 is scheduled in 2013 to adopt the 4th edition of UN Purple Book.</p>	
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. For the third stage of implementation: 2013 (scheduled). For full implementation: 2015 (scheduled).	
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 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?	

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 2012, more than 101,000 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 3,300+ substances are provided for SME as reference. CLA is operating the APEC project G.R.E.A.T. website to provide GHS labelling 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.
<ul style="list-style-type: none"> ● International implementation schedule. ● Discrepancies in building blocks approach among economics. ● Discrepancies in classification results due to different references. ● Scope of full implementation (lack of national chemical substance inventory, a national inventory is in the process of nomination and development).
<i>Industry to complete</i>
Has it been easy to access all necessary information for compliance?
Official GHS website (http://ghs.cla.gov.tw/), GHS Help Desk Service (+886-6-2937770).
Do you see any specific issues that are limiting the progress of GHS implementation?
<ul style="list-style-type: none"> ● Broad international implementation schedule. ● Lack of international approach on building block approach.
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"> ● 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?
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 of GHS as is written in the purple book?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please describe the building blocks that will be adopted.	
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?	

Not determined yet.
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?
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.	

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 workplace sector and the implementation schedule is to be finalised. In the transport sector, certain local requirements will be harmonised with part of the GHS on hazard symbols of dangerous goods where appropriate. Please refer to the sectors “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

<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	Labour Department
Contact person	Mr. 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 finalised	
How long is the phase in period and what are the transition arrangements?	
In line with majority member economies; Co-existence of current legislation and GHS during transitional period	
Are the main relevant legislations implementing GHS finalized and in operation?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
When the relevant legislation is ready for enactment	
Do you intend to adopt all hazard classification building blocks GHS as is written in the purple book?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please describe the building blocks that will be adopted.	
The physical and health hazard blocks that are relevant to existing legislation will be adopted	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
Under review	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	In line with existing statutory requirements
Hazard statements	In line with existing statutory requirements
Precautionary statements	In line with existing statutory requirements
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Aiming at reducing duplication or redundancy of information	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Yes	
Do you have training and awareness activities planned? If yes, please provide some information.	
Yes, training and awareness seminars planned	

Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?
A subject matter to be considered
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
Differences in adoption of building blocks among member economies
<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

<i>Regulator to complete</i>	
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 of GHS as is written in the purple book?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please describe the building blocks that will be adopted.	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	

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

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) Civil Aviation Department (for carriage of dangerous goods by air)
Contact person	Mr. Patrick LEUNG Wai-hung (Fire Services Department) Mr. Andrew NG Lap-hay (Marine Department) Dr. Clive FRANKS (Civil Engineering and Development Department) Dr. PANG Lok-sing (Create Hong Kong) Ms Amy POON (Civil Aviation Department)
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) 852- 2910 6980 (Civil Aviation Department)
E-mail address	lcpolice2@hkfsd.gov.hk (Fire Services Department) andrew_ng@mardep.gov.hk (Marine Department) camfranks@cedd.gov.hk (Civil Engineering and Development Department) pangloksing@createhk.gov.hk (Create Hong Kong) aympoon@cad.gov.hk (Civil Aviation Department)
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) http://www.cad.gov.hk (Civil Aviation Department)
Only	
Section 2	
Do you currently have regulations based on the UN "Orange Book" in operation in your economy?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, is this transport sector regulation compatible with GHS? Please explain how the interface between GHS and UN "Orange Book" based regulation works. If no, please provide the details of the implementation plan. Please provide links to relevant legislation, draft legislation and/or other regulatory information.	
The Fire Services Department (FSD) of the Government of the Hong Kong Special Administrative Region (HKSAR) 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 while Dangerous Goods	

(Application and Exemption) Regulation, (DG(A&E)R) 2012, and the Dangerous Goods (Shipping) Regulation, (DG(S)R) 2012, were passed in 2012. The remaining 2 regulations, viz. Dangerous Goods (General) Regulation, (DG(G)R), and Dangerous Goods (Packing, Marking and Labelling) Regulation, (DG(PML)R), are anticipated to be completed in 2014.

Under the DG(A&E)R 2012, the classification of dangerous goods in HKC was modelled on the International Maritime Dangerous Goods (IMDG) Code which is consistent with the UN Recommendations on Transport of Dangerous Goods, Model Regulations.

In the DG(PML)R under drafting, the labelling systems for road transport of dangerous goods will be modelled on the requirements of the UN Recommendations on Transport of Dangerous Goods, Model Regulations. In gist, the local requirements of HKC for danger labels for road transport of dangerous goods will be harmonised with part of GHS on hazard symbols of dangerous goods where appropriate.

Nevertheless, FSD 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 (CEDD) of the HKSAR Government 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 labelling systems of dangerous goods in HKC will be modelled 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 harmonised with part of GHS on hazard symbols of dangerous goods where appropriate. Nevertheless, the CEDD has no intention so far to implement GHS for land transport of explosives in HKC.

The Marine Department of the HKSAR Government 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 labelling 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 HKSAR Government 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.

The carriage of dangerous goods by air to, from or over HKC is required to comply with the requirements stipulated under the Technical Instructions for the Safe Transport of Dangerous Goods by Air (TI), approved and published by International Civil Aviation Organization (ICAO), instead of the UN "Purple book" or UN "Orange book".

The ICAO Dangerous Goods Panel will review periodically any changed recommendations of the United Nations Subcommittee of Experts on the Transport of Dangerous Goods or the International Atomic Energy Agency, and will amend the TI as deemed appropriate.

To give legal effect to the TI requirements, two pieces of legislation (i.e. the Dangerous Goods (Consignment By Air) (Safety) Ordinance and the Air Navigation (Dangerous Goods) Regulations) were enacted.

The proposed GHS will be implemented on air transport of dangerous goods in HKC if it becomes a TI requirement.

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.

Industry to complete

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

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

What are the expected costs for industry in the implementation of GHS / transport regulations?
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What are the expected benefits for industry through the implementation of GHS / transport regulations?
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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.	
INDONESIA	
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"> The Indonesian government has committed to implement GHS and establish the National Team of GHS in 2005, in conjunction with the GHS UNITAR Project. Scope of the First Period of GHS UNITAR Project (2005-2007) are Training and Capacity Building for the Implementation of the GHS of Classification and Labeling of Chemicals, consist of 3 phase of activities, i.e., Situation Analysis; Gap Analysis; and National Planning Strategy Arrangement. The Scope of Second Period of GHS UNITAR Project (2010 - 2013) are Training and Capacity Building for the Implementation of the GHS Classification and Labeling of Chemicals. The Scope includes three (3) phase of activities, i.e., Updating the National GHS Strategy; Completion and entry into force GHS Implementing Legislation; Training and Stakeholder Workshops; Supporting Activities for Stakeholders and Participate at Regional and International Communication. In 2009, regulation on GHS Implementation firstly published, i.e. Minister of Industry Decree No.87/2009; currently this regulation is under process of amendment. The task of Ministries in charge for GHS implementation, mainly are Ministry of Industry, Ministry of Manpower and Transmigration, Ministry of Agriculture, Ministry of Transportation and Ministry of Trade. Other relevant Ministry and Government authority are also support this program activity. The National Team of GHS consisting of people who interested, have competence, and background the chemical management. They are from university; chemistry association and chemical industry associations as well as government officers. They had participated at the training and capacity building of the GHS and Chemical Risk Assessment and Management in Indonesia and abroad, and. have been recognized / certified as trainer. Ministry of Industry has publish Purple Book in Bahasa Indonesia (first edition); GHS comic published by National Agency for Drug and Food Control (NADFC / BPOM); and GHS leaflets published by National Committee of Responsible Care (KN-RCI) <p>Some activities that has been carried out by the Ministry of Manpower and Transmigration RI to empower industries related with GHS implementation i.e.</p> <ul style="list-style-type: none"> Put GHS implementation into Chemical OSH Expert training, Chemical OSH Officer; Deliver GHS implementation to labor inspector in labor inspector training; Capacity building for labor inspector through GHS implementation training conducted by Ministry of Industry It has being revised Decree of Minister of Manpower RI. No. Kep.187/MEN/1999 concerning on Controlling Hazardous Chemical at Workplace. One of aspect to be revised is related GHS implementation. <p>The website: www.kemenperin.go.id (improvement in progress), and National Committee of Responsible Care Indonesia: www.responsiblecare-indonesia.or.id</p>	
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	Directorate of Downstream Chemical Industry Directorate General for Manufacturing Industry Basis Ministry of Industry, Republic of Indonesia
Name	Mrs. Toeti Rahajoe / Regina Anindita Tony
Phone number	+6221-5274385
E-mail address	tutihmt@yahoo.com / regina_reginess@yahoo.com
Website	www.kemenperin.go.id

Do you have a hazard classification database?

Yes

No

If yes, is it mandatory classification, or for information only? How do you access the database?

No, but now we will be establishing national database (in preparation stage) through collaboration with ASEAN – Japan to establish National and ASEAN Chemical Safety 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	Directorate of Norm Supervision on Occupational Safety and Health, Directorate General of Labor Supervision Development Ministry of Manpower And Transmigration, Republic of Indonesia
Contact person	Mr. Amri AK / Ms. Agustin Ernawati
Phone number	+62-21- 5255733 ext 264, +62-21-5268045
E-mail address	amriak@ymail.com / wahyuer@yahoo.com
Website	www.depnakertrans.go.id
When do you plan to implement GHS for this sector?	
The Government officially regulates GHS implementation in September 2009 through the Ministry of Industry Decree No.87/2009. GHS has been implemented for all chemicals used in workplaces mostly in big company, but for the SME are still required engagement from the government and relevant stakeholders to support and coaching them.	
How long is the phase in period and what are the transition arrangements?	
It's not determine	
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?	
<p>Legislations and Regulations relevant with GHS implementations are:</p> <ol style="list-style-type: none"> Act No 1 Year 1970 concerning on Safety; Decree of Minister of Manpower RI. No. Kep.187/MEN/1999 concerning on Controlling Hazardous Chemical at Workplace; Note : This regulation has being revised and put GHS implementation into revision draft Regulation of Minister of Manpower RI. No.: Per.03/MEN/1985 concerning on Occupational Safety and Health Requirement in Usage of Asbestos; Regulation of Minister of Manpower RI No. :Per. 03/MEN/1986 concerning on Occupational Safety and Health at Workplace for Handling Pesticides; <p>www.depnakertrans.go.id</p>	
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 will be included in the Amendment of Minister Industry Decree No.87/2009	
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?	
Workplace regulation requires a hazard-based label; Risk assessment is also required in workplaces handling the 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?	
Pictogram and Hazard Statements are both required to be on label for products used in workplaces. Precautionary statements may be selected by the manufacturer. Guidance on labeling allows some precautionary statements to be omitted.	
Other information (eg. Risk-based advice for pesticides) may be presented 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, in planning	
Do you have training and awareness activities planned? If yes, please provide some information.	
Yes, awareness trainings have been done in past two years and will be continued for training and workshop	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
To be considered	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
<ul style="list-style-type: none"> • Lack of chemical inventory database / chemical safety database • The comparison of number of OSH human resources (labor inspector) with number of companies that should be supervised are not balance 	
<i>Industry to complete</i>	
Has it been easy to access all necessary information for compliance?	
Some regulation can be accessed from website.	
Do you see any specific issues that are limiting the progress of GHS implementation?	
Increase capacity building for government staff in particular for person in charge for GHS implementation for pesticide / agrochemical is required.	
What are the expected costs for industry in the implementation of GHS?	
May be in the initiation stage	
What are the expected benefits for industry through the implementation of GHS?	
For safety and security of chemical, people and environment	

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	Directorate of Downstream Chemical Industry Directorate General of Manufacturing Industry Basis Ministry of Industry
Contact person	Ir.Toeti Rahajoe, MM (Mrs)
Phone number	+62 21 5274385
E-mail address	tutihmt@yahoo.com
Website	www.kemenperin.go.id
When do you plan to implement GHS for this sector?	
GHS is mandatory for single substance since September 2009 and for mixtures is going to implemented mandatorily in December, 2016	
How long is the phase in period and what are the transition arrangements?	
For single substances, phase in period needed 6 (six) months after decree of Minister of Industry concerning GHS of classificaton and labelling for chemicals had been legalized. For mixtures, phase period will need 3 (three) years since the Revision of decree of Minister of Industry concerning GHS of classification and labelling for chemical legalized in 2013. Transition arragentments occured from mandatory for single substance and voluntary for mixture to mandatory both single substance and 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?	
Website concerning on GHS implementation in Indonesia is still under-construction	
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. sensitisers. If no, please describe the building blocks that will be adopted.	
Cut-off points will be adopting from UN GHS Purple Book with consideration for cut-off value or concentration limit is lower than cut-off value of UN GHS Purple Book.	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
Yes, Chemical hazard and risk assessment are complementary engagement and can not be separated to each other. Risk assessment is still pending issue and not defined yet	
Is there to be a maximum number of the following included on the SDS and the label?	

Pictograms	No, refer to UN GHS Purple Book
Hazard statements	No, refer to UN GHS Purple Book
Precautionary statements	No, refer to UN GHS Purple Book
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
The hierarchy of pictograms, hazard statements and precautionary statement is defined by adopting UN GHS Purple Book. The Provisions of hazard statements and precautionary will be regulated in Decree of Director General for Manufacturing Industry Basis	
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?	
Imported chemicals / product must comply GHS provision in Indonesia as mentioned in Decree of Minister of Industry and the Revision concerning on GHS of Classification and Labelling for Chemicals.	
Do you have training and awareness activities planned? If yes, please provide some information.	
Yes, awareness training have been done every year since 2004 in collaboration with National Committee of Responsible Care Indonesia (KN-RCI), supported by JETRO and AOTS of Japan, as well as UNITAR. Indonesia will continue to conduct training & capacity building aims to advance competency of personnel especially for small and medium enterprise (SME) or small medium scale industry and the government officials (regulators) as well	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
Yes, likely. We consider	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
<ul style="list-style-type: none"> • Commitment of CEO is very important and really required for implementation of GHS • CEO commitment not only as the Top Executive of the Company but also Senior Government Officer who in charge or relevant for chemical management improvement in Indonesia • Regular upgrading for GHS expert or trainers is required must be conducted annually • Number of qualified GHS trainers is limited and shall be increased to provide GHS training and workshop on GHS and Chemical Management and Risk Assessment; the first priority is training and workshop at the potential chemical industry zones and consumers. • Appropriate planning for the GHS training and workshop with emphasize for SME must be carried out including budget planning. 	
<i>Industry to complete</i>	
Has it been easy to access all necessary information for compliance?	
<ul style="list-style-type: none"> • Information on the progress/status is very limited, most of them are not yet readily available to stakeholders. • The GHS has been implemented to chemical producers / manufacturers but for consumer products is not yet mandatory in Indonesia such as paint, asbestos, etc. including chemical in article; • Voluntary approaches are recommended as important action including to provide technical guidance and required tools. 	
Do you see any specific issues that are limiting the progress of GHS implementation?	
<ul style="list-style-type: none"> • The use of risk-based labeling for chronic effects must be a high priority for consumer products. • From point of view of industry associations, coordination among "<u>relevant ministries or government agencies</u>" is very important. Industry association (FIKI & KN-RCI) support and strongly suggest the government of Indonesia to reactivate National Forum on Hazardous and Toxic Material (FORKONAS) as National Coordinating Council for GHS / Chemical Management and Risk Assessment. The coordinating council consisting of Ministry of Industry; Ministry of Manpower; Ministry of Agriculture; Ministry of Transportation and Ministry of Trade. Other related government authority also required to support the GHS Implementation Program. • The Government must officially issue priority list of chemical mostly available in Indonesian market as the target of GHS. • The Ministry of Industry must take efforts to establish national chemical safety database (national chemical inventory) 	

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

- **The cost for GHS implementation is not a big issue for the multinational companies and (MNC) and national large company / industry including State Owned Enterprises such as national petrochemical industry, fertilizer enterprises, etc.**
- **However some of company/industry including the SME the cost may be facing as the cost challenge.**
- **The Government / Ministry of Industry is expected to encourage and support the SME by conducting coaching program, in collaboration with national industry association**

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

- **Getting recognition from national authority and international parties mean a good and increase prospective business; By implementating GHS, industry doesn't only comply the decree of Minister of Industry and UN GHS Purple Book Provision, but also consumer products will be accepted in market.**
- **Achieving the objective / goal of GHS i.e. to protect human health and environment; the producer/industry can produce and distribute its product safely for people (physic and health), and environment with deeply concern on safety and security.)**
- **Continuously improve understanding of hazardous chemical**
- **Improve downstream of hazard assessment activities**

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	Pesticide Committee / Directorate of Fertilizer and Pesticide DG of Agriculture Infrastructure Ministry of Agriculture, Republic of Indonesia
Contact person	Mrs. Suprapti / Mrs. Yulia Purwanti
Phone number	+62 21 789 0043 / +62 21 781 0044
E-mail address	yulia_pungki@yahoo.com
Website	www.deptan.go.id
When do you plan to implement GHS for this sector?	
For the use of pesticides are used according to the labelling provisions of the FAO / WHO; for import-export activities have attended GHS regulations, refer to the Ministry of Agriculture (MOA) Decree No.24/2011	
How long is the phase in period and what are the transition arrangements?	
GHS Implementation for pesticide products (mixture) refer to Decree of Ministry of Industry No. 87/2009; Pending on FAO/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?	
No, it is not finalized yet but relevant legislations are gradually reviewed and updated as well as improvement of the website are in progress. www.deptan.go.id	
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 single substance refer to existing regulations, for pesticide (mixture) refer to regulation of the FAO and WHO (harmonization work is in progress)	
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?	
Risk assessment element is not determined yet, and therefore training and capacity building related to this issue are important and required.	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	Refer to GHS purple book and FAO/WHO
Hazard statements	Refer to GHS purple book and FAO/WHO
Precautionary statements	Refer to GHS purple book and FAO/WHO
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Based on GHS Criteria / Building Block and FAO / 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?	
Pesticides that have been registered at the Ministry of Agriculture can be imported or produced. In order to process the registration and for the purposes of research and product development; Sample of (new) pesticides in limited quantities is possible for import. Classification and labeling have been listed in the	

conditions / requirements pesticide registration (Decree of Agriculture Minister No.24/2011)
Do you have training and awareness activities planned? If yes, please provide some information.
Yes, training and capacity building program on the use of pesticide have been conducted. Training and Workshop on GHS and Risk Assessment related to pesticide / agrochemicals is required and to be held in cooperation with relevant institutions/organization (detailed planning will be determined).
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?
We have collaborated with ASEAN member country for some activities. We will consider extending activity on improvement of GHS implementation within ASEAN countries as well as collaboration with APEC member economies.
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
<ul style="list-style-type: none"> • Conduct Training for the trainer on GHS with emphasize on classification and labeling of mixture (pesticide) as well as chemical management and risk assessment, participated by pesticide manufacturers, distributors and relevant stakeholders as well as Staff of Ministry of Agriculture who in charge of the regulation person and field supervision. • Collaborate with relevant institution to conduct training and capacity building on GHS implementation. • Regularly review to improve regulation based on the global trend chemical management and to harmonize with other regulation (effective and applicable regulation).
<i>Industry to complete</i>
Has it been easy to access all necessary information for compliance?
<ul style="list-style-type: none"> • Ministry of Agriculture (MOA) is expected establishing website related to GHS implementation especially for pesticides/agrochemicals. • The MOA/Government Agency/Regulators are expected to establish the inventory database or database of chemical/pesticide relevant to the National Chemical Safety Database (that is in progress of planning by the MOI); that mean provide appropriate information, available and easily accessed by industry and public • The MOA is expected to improve cooperation networking with the associations and relevant stakeholders, to conduct awareness training and workshop on GHS to improve knowledge and competency of pesticide manufacturers (SME), transporters, distributors including the shops ' owner of pesticide and fertilizer shops.
Do you see any specific issues that are limiting the progress of GHS implementation?
<ul style="list-style-type: none"> • FAO/WHO information on pesticide that is aligned with the GHS must be developed by MOA • Training and coaching on GHS for SME
What are the expected costs for industry in the implementation of GHS?
<ul style="list-style-type: none"> • Challenge for industry (SME) to comply with regulations related to GHS • Preparing appropriate budget for SDS and labeling of pesticide/agrochemical products must be prioritized by man
What are the expected benefits for industry through the implementation of GHS?
<ul style="list-style-type: none"> • Safety and security of chemical (pesticide), safety for people/users and environment

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, Labour, 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), Ministry of Land, Infrastructure, Transport, and Tourism (MLIT), and Cabinet Office (CAO). This committee developed “GHS Classification Guidance for the Japanese Government” to facilitate classification process dealing with chemical substances in 2009 (it was revised in 2010 and will be revised in 2013). And METI also developed guidance for chemical mixture as “GHS Classification Guidance for Enterprises” in 2009 (it was revised in 2010 and will be revised in 2013). (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 (JIS Z 7252) 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 labelling to reflect 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. In 2013, Japan will revise JIS Z 7252 based on the GHS classification to reflect the 4th revision of GHS Purple Book and ‘Building Block approach’ determined in Japan.. • The inter-ministerial committee decided to adopt risk-based labelling 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). • 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 revised related ordinances and guideline to make conform with GHS. <Summary of revision of PRTR Law> <ul style="list-style-type: none"> -The information which is required in SDS expanded to 16 headings as GHS. -Labelling became effort-obligation. -Japanese Industrial Standard (JIS) Z7253 which covers Labelling and SDS became effort-obligation to follow. etc. <Summary of revision of ISHL > <ul style="list-style-type: none"> -SDS and labeling of chemicals were expanded as effort-obligation basis as of 1 April 2012; -JIS Z7253 is recommended as an example to comply with the amended ordinance. 	
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, Labour, and Welfare (MHLW)
Name	Mr. Hisao YAMAGUCHI
Phone number	+81-3-3502-6756
E-mail address	yamaguchi-hisao@mhlw.go.jp

Website	http://www.mhlw.go.jp/
Do you have a hazard classification database?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, is it mandatory classification, or for information only? How do you access the database?	
<ul style="list-style-type: none"> • Japanese government classified substances regulated by laws (about 1400 substances since FY 2005 to 2006). With regards to hazard for their physical and human health, METI and MHLW classified substances. MOE classified their hazard for aquatic environment and ozone layer. 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. Japan will develop the computer software for GHS classification of mixtures based on the 4th revision of GHS Purple Book and 'Building Block approach' in Japan in 2013~2014. <p>http://www.meti.go.jp/policy/chemical_management/int/ghs_auto_classification_tool_ver3_download.html</p>	

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 107 substances for labelling and 640 substances for delivering SDS under the Ordinance on Industrial Safety and Health	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °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. Reiko EDA
Phone number	+81-3-3501-0080
E-mail address	Eda-reiko@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 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?
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
Contact person	Mr. Tomohiro ISHIOKA Mrs. Chiemi SAITO
Phone number	+81-3-3501-3767
E-mail address	ghs-agri@nm.maff.go.jp
Website	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) g_MRB_KSK@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. Hiromitsu SUGIMOTO
Phone number	(by air) +81-3-5253-8731
E-mail address	(by air) dg-jcab@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 labelling 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 labelling 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. 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?	
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?	

Agriculture

<i>Regulator to complete</i>	
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	Mrs. Supanon Sirichuaychoo
Phone number	0 2579 7986
E-mail address	ssupanon@yahoo.com
Website	
When do you plan to implement GHS for this sector?	
GHS will be used when pesticides are re-registered which will commence in 2017	
How long is the phase in period and what are the transition arrangements?	
Please in period will be commenced in 2017	
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?	
It is expected to be finalized in 2015	
Do you intend to adopt all hazard classification building blocks of 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.	
The adopted cut-off point for sensitizers are 0.1% W/W	
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?	
Not decided yet	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	Not decided yet
Hazard statements	Not decided yet
Precautionary statements	Not decided yet
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Not decided 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?	
Imported pesticide with GHS label is accepted.	
Do you have training and awareness activities planned? If yes, please provide some information.	
Yes. Introduction to GHS had been trained for officials and private sector.	
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?

2013 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 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 Catherine Oh by **COB Monday 11 March 2013**.

History

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.

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.

Three GHS implementation reports have been finalized so far – one in 2009, another between 2010 and 2011, and the third in 2012. Summary of implementation progress was compiled for APEC Ministers in 2009, 2011 and 2012 based on these responses.

At the APEC CD 2012 a decision was reached to publish the GHS implementation reports on the GHS Reference Exchange and Tool (GREAT) website hosted by the Chinese Taipei to allow sharing of this information (<http://great.cla.gov.tw/ENG/index.aspx>). It is expected that the 2013 report will also be made available on the GREAT website.

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 February 28, 2013.	
Does your Economy intend to adopt and implement GHS for any chemical sector in the near future (Starting work within the next 2 years)? The U.S. transportation sector has already adopted and implemented the GHS. OSHA published the final GHS rule for the industrial/workplace sector on March 26, 2012 and implementation has started.	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If yes, go to next question. If no, no further answers are required.</i>	
Is there an overall strategic plan for GHS implementation? Each U.S. agency/sector has its own statutory authorities and implementing regulations. Each agency/sector will develop its own GHS implementation plan.	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, where can it be found? Please list websites, attach documents, etc.	
Do you have a GHS coordinator to facilitate implementation discussions within your economy? The U.S. coordinates GHS implementation through an interagency committee.	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Environmental Protection Agency (EPA); Occupational Safety and Health Administration (OSHA); Department of Transportation (DOT); Consumer Product Safety Commission (CPSC)
Name	Interagency Coordinating Group on Harmonization Contact: Maureen Ruskin/OSHA
Phone number	1-202-693-1955
E-mail address	Ruskin.Maureen@dol.gov
Website	http://www.osha.gov/dsg/hazcom/index.html
Do you have a hazard classification database?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, is it mandatory classification, or for information only? How do you access the database?	
U.S. DOT uses the UN Orange Book classification list as a basis for its HMT table/list.	

Industrial Workplace

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

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

Industry to complete

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

OSHA published the requirements to implement the GHS on March 26, 2012. OSHA has published a few HazCom 2012 implementation tools. More detailed guidance is needed to assist in implementation. The guidance is needed as soon as possible. OSHA has not been clear when and if they will update HazCom 2012 to align with GHS revisions 4 and 5.

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

Global Industrial Workplace Issues:

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

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

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

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

- **To achieve the goal of harmonization and reap the associated benefits, OSHA/governments should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries. The OSHA final GHS rule is generally aligned with the GHS, but there are several issues that are not aligned, e.g., mandatory precautionary statements, **combustible dusts, Hazards, Not Otherwise Classified (HNOCs).****
- **Collaboration is needed among the U.S. Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the GHS final rule. However, EPA and CPSC are not making progress in implementing the GHS. 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. On April 9, 2012, the Coast Guard published a NPRM which creates a new requirement to specifically require SDSs for cargoes on ships. The format of this NPRM SDS example is inconsistent with the UN's GHS framework, inconsistent with OSHA's adoption of the GHS in HCS-2012, and based on GHS rev-2.**

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

- **Significant costs are anticipated for SDS revisions, re-labelling, re-distributing revised SDSs to customers, and employee training. Information Technology (IT) solutions (i.e., software) are already available through major vendors offering SDS authoring systems supporting GHS. Although in many cases the bulk of the software (i.e., algorithm) work is complete, country or regional differences in regulatory provisions may require upgrades.**

- API member companies issue tens of thousands of SDSs that will need revision to meet the OSHA GHS final rule. For example, one API member company currently has approximately 4,500 SDSs for the U.S. market, all of which will require revision under the OSHA GHS final rule. For this one company, approximately 10,000 U.S. employees would be affected, e.g., require updated training.
- **Non-harmonized issues like HNOCs and combustible dusts add to the cost of doing business internationally. Non-harmonized SDS formats, e.g., the IMO/Coast Guard format, also add to the cost of doing business internationally.**

Costs for industry can be reduced by the following:

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

API suggests providing at least the following assistance materials:

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

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

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

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

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

The costs for industry can be reduced by the following:

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

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

Consumer Products

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

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

Industry to complete

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

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. [Only the EU CLP has a clear schedule for implementing updates to the GHS via their ATP process.](#)

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

- **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. [On April 9, 2012, the Coast Guard published a NPRM which creates a new requirement to specifically require SDSs for cargoes on ships. The format of the SDS example is inconsistent with the UN's GHS framework, inconsistent with OSHA's adoption of the GHS in HCS-2012, and based on GHS rev-2.](#)**

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

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

implementation?

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

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.

After OSHA published their final GHS Rule, the EPA published a timely Pesticide Registration Notice to aid in explaining the potential differences in pesticide and industrial sector labeling.

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. **Only the EU CLP has a clear schedule for implementing updates to the GHS via their ATP process.**

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. **Non-harmonized issues like HNOCs and combustible dusts add to the cost of doing business internationally.****

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 through the 17th Revised Edition of the UN Model Regulations, Amendment 36–12 to the IMDG Code and the 2013–2014 ICAO Technical Instructions.</p> <p>There have been no issues accessing the necessary compliance information from the U.S. DOT. U.S. DOT routinely holds stakeholder meetings prior to the UNSCETDG meetings in Geneva to obtain stakeholder input. DOT routinely amends 49 CFR/Hazardous Materials Regulations to incorporate on-going updates of the UN Model Regulations and the modal requirements of the IMDG Code and ICAO Technical Instructions.</p> <p>U.S. Coast Guard / IMO SDS On April 9, 2012, the Coast Guard published a NPRM which creates a new requirement to specifically require SDSs for cargoes on ships. The format of this NPRM SDS example is inconsistent with the UN's GHS framework, inconsistent with OSHA's adoption of the GHS in HCS-2012, and based on GHS rev-2.</p> <p>Information regarding the implementation of the IMO "Recommendations for Material Safety Data Sheets (MSDS) for MARPOL Annex I Oil Cargo and Oil Fuel" (Resolution MSC.286(86)) has not been readily available from the U.S. Coast Guard. Also the information on how the IMO SDS resolution is being implemented globally is not readily available.</p>	
Do you see any specific issues that are limiting the progress of GHS implementation / transport regulation?	
<ul style="list-style-type: none"> • To achieve the goal of harmonization and reap the associated benefits, governments/organizations should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries/organizations. • Collaboration is needed among Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the final GHS rule. However, EPA and CPSC are not making progress in implementing the GHS. 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. **The inconsistent SDS formats for OSHA HazCom 2012, the UN GHS and the proposed recommended Coast Guard SDS format do not promote harmonization.**

U.S. Coast Guard / IMO SDS

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

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

U.S. Coast Guard / IMO SDS

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

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

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

U.S. Coast Guard / IMO SDS

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