

Progress on the Implementation of GHS in APEC Economies
APEC Chemical Dialogue Virtual Working Group on GHS
April 2014

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 2014 report is the fifth 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	2014
Australia	✓	✓	✓	✓	✓
Chile	✓	✓	✓		✓
Chinese Taipei	✓	✓	✓	✓	
Hong Kong, China	✓	✓	✓	✓	
Indonesia				✓	✓
Japan	✓	✓	✓	✓	✓
Korea	✓				
Malaysia		✓			✓
New Zealand	✓				
Philippines	✓ [#]				
Russia		✓			✓
Singapore	✓				✓
Thailand			✓	✓	
USA	✓	✓ [*]	✓ [*]	✓ [*]	✓ [*]

[#]Only the general information section was completed.

^{*}Only industry responses have been received.

PROGRESS REPORT

In total, there are seven completed and one partially completed GHS reporting templates for analysis for this report. Completed reports were received from– Australia; Chile; Indonesia; Japan; Malaysia; Russia and Singapore. The American Petroleum Institute (API) also provided its perspective on GHS implementation in the USA for each of the sectors. The full reports are provided as Attachments 1-8.

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 some cases, the 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.

There are several key concerns identified in the GHS implementation reports for industrial Workplace. Training and capacity building is has emerged as a major issue for most economies. The lack of experts with understanding of GHS in both government and industry has been flagged as a major issue.

The discrepancies between economies' implementation of GHS has also been flagged as a major issue. 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.

The high overall cost of GHS implementation for industry has been raised in a number of the reports as a key issue, as well as the resource capacity difference between large enterprises and SMEs.

Industrial Workplace sector identified the following challenges for GHS implementation:

1. Training and expertise: Lack of experts in both government and industry to classify chemicals and conduct GHS training,
2. Lack of clear and practical information for regulatory compliance, with some economies providing information/resources only to local companies,
3. Unknown and/or inconsistent international implementation schedules,
4. Lack of international approach to building block adoption,
5. Discrepancies in classification results depending on references used/concerns over reliable sources of data,
6. The need to build capabilities e.g. of local laboratories to conduct tests that may be needed to classify chemicals, and
7. High cost of implementation.

The majority of the reports cited two of the end-goals for GHS implementation, improvements to worker health and safety and facilitation of trade resulting in reduction in transaction costs as the driving factor for GHS implementation. However, the lack of expertise and training and lack of harmonization across economies raises serious concerns over accomplishing these end-goals.

Consumer

GHS implementation appears more difficult for the consumer products sector than for the workplace chemicals sector. Some economies have applied the same GHS implementation for workplace chemicals and consumer products, while others have chosen not to implement GHS for the consumer products sector. Many economies are still considering the potential implementation of GHS for consumer products.

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.

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.

Further, while some economies have consumer products specific rules, other do not appear to separate rules for consumer products.

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

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

As 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. The majority of economies have indicated that they follow FAO rules. Some have indicated that they are also considering GHS implementation on top of the FAO rules.

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

A new emerging thread appears to be the overlap between the Industrial Workplace sector and Agriculture. Australia and Indonesia have both specifically mentioned agricultural labelling requirements in response to Industrial Workplace chemicals labelling requirements. While both economies require specific agricultural labelling, GHS labelling is considered an additional requirement.

GHS implementation for the Agricultural sector appears to require closer study. 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". In order to ensure there is no

confusion in the Agriculture sector, the FAO/WHO and GHS requirements should be studied and recommendations made so that any duplicative or conflicting requirements are removed.

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”).

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. As there are different reasons for each of the sectors, the solutions should also be sector specific.

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 five major hurdles. They are the:

1. Need for capacity building for both government and industry,
2. Need to bring SMEs along in GHS implementation,
3. Divergence in classification leading to different labels from different economies,
4. Different building blocks/approaches adopted by different economies, and
5. Potential need for increased testing of chemical mixtures.

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.

There is an ever growing need to properly train existing Regulatory Scientists in both government and industry on GHS. This training should also ensure that the understanding of the

requirements of GHS is consistent across different economies and across government and industry.

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.

The implementation of GHS for the Agricultural sector also does not appear to be progressing. However, the implementation of GHS in Industrial Workplace is affecting the Agriculture sector. There is a need to review the current Agricultural regulatory framework based on FAO/WHO and GHS to ensure any duplicative or conflicting requirements are removed.

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 increasing expertise in GHS by training existing APEC economy Regulatory Scientists in both government and Industry.
3. Consider GHS training packages suitable for SMEs.
4. Consider a study into Agriculture sector rules based on FAO/WHO and GHS implementation, with a focus on duplicative or conflicting requirements.
5. 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
Australia coordinates GHS implementation through an Australian Government interdepartmental committee facilitated by input from a UN Sub-Committee on GHS delegation led by the Workplace Health and Safety portfolio. The Industry portfolio is the focal point for GHS reporting to the APEC Chemical Dialogue.	
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Safe Work Australia
Name	
Phone number	+61 2 6121 5317
E-mail address	info@swa.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 the model Work Health and Safety Regulations, the database will 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	Ms Caroline Reid
Phone number	+61 2 6240 6960
E-mail address	Caroline.Reid@swa.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 2014 seven out of nine jurisdictions (including the Commonwealth) have implemented the new WHS laws incorporating the GHS for classification, labeling and SDS. The remaining two 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 the GHS, 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?	
<p>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.</p>	
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?	
<p>Except for defined special labelling situations, pictograms, hazard statements, precautionary statements and signal words are required to be on a label for hazardous chemicals used in workplaces. Not all precautionary statements relating to a particular hazard classification need to be used on the label. Guidance is given that a maximum of between six and ten precautionary statements should appear on the label, depending on the nature and severity of the hazards.</p> <p>Other information (eg. Risk-based advice for pesticides) may be present on the label in addition to workplace GHS requirements.</p>	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
<p>Yes, "deem-to-comply" provisions. All jurisdictions prior to implementation of the harmonized WHS laws amended legislation to accept GHS classified and labeled chemicals.</p> <p>The new WHS laws also allow additional GHS classifications to be communicated on labels.</p> <p>For imported chemicals, details of the Australian importer and Australian emergency contact information must be included in the SDS.</p>	
Do you have training and awareness activities planned? If yes, please provide some information.	
<p>Yes. Safe Work Australia developed training materials on the GHS and held a number of training sessions using the materials around Australia.</p> <p>There are two training modules; (1) an introduction to the GHS and (2) on classification of chemicals in more detail, together with training questions and answers. These are on the Safe Work Australia website at: http://www.safeworkaustralia.gov.au/sites/swa/whs-information/hazardous-chemicals/classifying-chemicals/pages/classification</p> <p>It is expected that further GHS training sessions will be held in the future.</p> <p>Guidance on classification is available from the Safe Work Australia website. Other guidance to assist users understand labels and SDS is also available.</p>	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
No.	
Please list any specific issues of concern you have experienced so far during your GHS	

implementation efforts.
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?
<ul style="list-style-type: none"> • 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.	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
<p>Risk assessment will be overlaid on top of GHS classification. 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. 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?

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?
<p>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.</p> <p>Indirect costs include:</p> <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. <p>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.</p> <p>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.</p>
What are the expected benefits for industry through the implementation of GHS?
<p>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.</p> <p>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</p>

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. 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	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.

2014 GHS Implementation Progress Reporting Template

Introduction

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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 Friday 14 March 2014. This is to enable the progress report to be developed and circulated to the CD out-of-session for approval prior to forwarding to Ministers in May 2014.

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.

Four GHS implementation reports have been finalized so far – 2009, 2010/11, 2012 and 2013. Summary of implementation progress was compiled for APEC Ministers in 2009, 2011, 2012 and 2013 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 2014 report will also be made available on the GREAT website.

General

Please provide the Economy for which this Template is completed below.	
Does your Economy intend to adopt and implement GHS for any chemical sector in the near future (Starting work within the next 2 years)?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<i>If yes, go to next question. If no, no further answers are required.</i>	
Is there an overall strategic plan for GHS implementation?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, where can it be found? Please list websites, attach documents, etc.	
Do you have a GHS coordinator to facilitate implementation discussions within your economy?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	MINISTERIO DE SALUD
Name	PAMELA SANTIBAÑEZ
Phone number	56 2 25740717
E-mail address	psantibanez@minsal.cl
Website	www.minsal.cl
Do you have a hazard classification database?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, is it mandatory classification, or for information only? How do you access the database?	
We use the transport classification; the criteria's are established in Chilean Standard NCh 382:2013.	

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

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

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

Agriculture

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

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

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?	
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?	

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General

Please provide the Economy for which this Template is completed below.	
Does your Economy intend to adopt and implement GHS for any chemical sector in the near future (Starting work within the next 2 years)?	
<input checked="" type="checkbox"/> Yes ✓	<input type="checkbox"/> No
<i>If yes, go to next question. If no, no further answers are required.</i>	
Is there an overall strategic plan for GHS implementation?	
<input checked="" type="checkbox"/> Yes ✓	<input type="checkbox"/> No
If yes, where can it be found? Please list websites, attach documents, etc.	
Kemenperin.go.id/ghs (website is still under construction, yet documents related GHS implementation in Indonesia already have been accessed)	
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 Industry Republic of Indonesia Directorate General of Manufacturing Industrial Base, Directorate of Downstream Chemical Industry
Name	Ir. Toeti Rahajoe, MM
Phone number	+6221 – 5274385
E-mail address	tutihmt@yahoo.com
Website	www.kemenperin.go.id/ghs
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?	
Mandatory classification Classification database can be accessed in the Decree of Director General of Manufacturing Industry Base of the MOI (which has been legalized) Number:04/BIM/1/2014 dated 28th January 2014 concerning Technical Guidance and Surveillance/Control of GHS implementation.	

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 Manpower And Transmigration, Republic of Indonesia Directorate of Norm Supervision on Occupational Safety and Health, Directorate General of Labour Supervision Development
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?	
Officially Indonesia already implemented GHS for single chemical substance since 24 March 2010 as mandatory.	
How long is the phase in period and what are the transition arrangements?	
<p>Six (6) months after Decree of Minister of Industry Number 87/M-IND/PER/9/2009 has been legalized; and three (3) months after Decree of Minister of Industry Number 23/M-IND/PER/4/2013 has been legalized</p> <p>The transition arrangements were regulated by releasing the Decree of Director General of Manufacturing Industry Base of the MOI (which has been legalized) Number:04/BIM/1/2014 dated 28th January 2014 concerning Technical Guidance and Surveillance/Control of GHS implementation including the date as mandatory provision</p>	
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"> 1. Act No 1 Year 1970 concerning on Safety; 2. 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 3. Regulation of Minister of Manpower RI. No.: Per.03/MEN/1985 concerning on Occupational Safety and Health Requirement in Usage of Asbestos; 4. 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 Decree of Minister of Industry Number 23/M-IND/PER/4/2013	
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?	
<p>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.</p> <p>Other information (eg. Risk-based advice for pesticides) may be presented on the label in addition to workplace GHS requirements.</p>	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or “deemed-to comply” provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Ministry of Manpower has not engagement directly on import and export of chemicals activities.	
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 still be continued for training and workshop	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
Yes, we intend to exchange personnel and would like to have support from developed economy to conduct capacity building training on GHS. However, information exchange regarding harmonization of GHS will be prioritized. We also participate at the ILO and UNITAR’s program on GHS implementation	
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 	
Industry to complete	
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?	
Yes at 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 section.</i>	
Lead Government Agency	Ministry of Industry, Directorate General of Manufacturing Industrial Base, Directorate of Downstream Chemical Industry
Contact person	Ir. Toeti Rahajoe, MM
Phone number	+6221 – 5274385
E-mail address	tutihmt@yahoo.com / regina_reginess@yahoo.com
Website	www.kemenperin.go.id/ghs
When do you plan to implement GHS for this sector?	
Indonesia already implemented GHS for single chemical substance since 24 March 2010 as mandatory.	
How long is the phase in period and what are the transition arrangements?	
Six (6) months after Decree of Minister of Industry Number 87/M-IND/PER/9/2009 has been legalized; and three (3) months after Decree of Minister of Industry Number 23/M-IND/PER/4/2013 has been legalized The transition arrangements were regulated by releasing the Decree of Director General of Manufacturing Industrial Base of the MOI (which has been legalized) Number:04/BIM/1/2014 dated 28th January 2014 concerning Technical Guidance and Surveillance Control of GHS implementation including the date as mandatory provision.	
Are the main relevant legislations implementing GHS finalized and in operation?	
<input checked="" type="checkbox"/> Yes ✓ Decree of Director General of Manufacturing Industry Base No.:04/BIM/1/2014 concerning Technical Guidance and Surveillance of GHS Implementation which has been legalized on 28 th January 2014.	<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?	
www.kemenperin.go.id/ghs	
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 value and concentration limit are regulated in Decree of Director General of Manufacturing Industrial Base. e.g. acute toxicity has cut-off value $\geq 1,0\%$ Note: CBI and Building Block are included in the Decree of Director General	
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, label for chemical substance covers chemicals identity, GHS pictograms, signal word, hazard statement, precautionary statement, and producer, supplier, and or importer identity. Risk assessment will be devoted in Safety Data Sheet (SDS).	
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?	
Hierarchy of pictograms, hazard statements and precautionary statements are referred to UN GHS Purple Book.	
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?	
All imported chemicals (both single and mixture) must comply with GHS regulation in Indonesia (Decree of Minister of Industry Number 23/M-IND/PER/4/2013). Single chemical substance is mandatory to implement GHS since 24 March 2010; and mixture will be mandatory to be implemented in 31 December 2016. The compliance covers both domestic chemicals product and imported chemicals.	
Do you have training and awareness activities planned? If yes, please provide some information.	
Yes, capacity building training was conducted in 2011 – 2013 in Jakarta, Serang, Surabaya, and Batam cities, in order to disseminate GHS provision and regulation, and to raise awareness for chemical industry's stakeholders. The practical training will be continued this year in collaboration with Responsible Care Indonesia and other related organization.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
Yes, we intend to exchange personnel and would like to have support from developed economy to conduct capacity building training on GHS. However, information exchange regarding harmonization of GHS will be prioritized.	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
<ol style="list-style-type: none"> 1) Raise awareness for chemical industry stakeholders regarding GHS implementation 2) Lack of coordination and synergy among ministries & national agency, industries/chemical companies, academe and other related institutions. 3) Gap between large scale chemical industry and SMEs 4) Monitoring, surveillance, evaluation regarding GHS implementation 5) Competency of human resources engage with chemical management 6) Limited capability in determining Building Block, Cut-off Value, Concentration limit and CBI regarding the GHS implementation 7) Lack of facility and infrastructure. 8) Finance endorsement 	
<i>Industry to complete</i>	
Has it been easy to access all necessary information for compliance?	
MNCs and national large companies have no difficulties to access information but SMEs has limited resource and capabilities to access.	
Do you see any specific issues that are limiting the progress of GHS implementation?	
Insufficient resource particularly at the local government level such as in the provincial government and lower level. Not all related staff of the Ministry and Government Agency understand the basics of GHS, let alone how its implementation. Other important issues are the need of coordination and synergy among relevant regulators, as well as not to overlap the policy.	
What are the expected costs for industry in the implementation of GHS?	
No additional costs or any special costs in the implementation of GHS	
What are the expected benefits for industry through the implementation of GHS?	
Government must facilitate and expedite commerce (export-import), chemicals, to guide, anticipate and prevent the hazards and risks of chemicals; providing security for all stakeholders including manufacturers, distributors, retailers, consumers and users.	

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
Contact person	Directorate of Aviation Safety att. Mr. Zainul Arifin Phone: +62818279345; E-mail: zainularifindju@yahoo.com Directorate of Sea and Coast Guard att. Mrs. Eka Sukmawati Phone: +628129172724; E-mail: kplp_psc@dephub.go.id Directorate of Land Transport att. Mr. Eddy Gunawan Phone: +6281310930263, e-mail: almakalosa@yahoo.com.au
Phone number	See above
E-mail address	See above
Website	www.dephub.go.id
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	
Yes, currently most transport sector regulation are inline with international regulation: UNRTDG for the Land Transport, ICAO Annex 18 for the air transport and IMDG Code for the Sea Transport. Our understanding that harmonization work of UNRTDG etc., with the GHS is in progress in international level (coordinated by related organization under the UN).	
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?	
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 UNRTDG/ICAO/IMDG Code
Hazard statements	Refer to GHS purple book and UNRTDG/ICAO/IMDG Code
Precautionary statements	Refer to GHS purple book and UNRTDG/ICAO/IMDG Code
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Based on GHS Criteria, Building Block and UNRTDG/ICAO/IMDG Code 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?	
Will be considered	
Do you have training and awareness activities planned? If yes, please provide some information.	
This year we plan to conduct training and awareness for officers of MOT and transporter companies (LSP) in collaboration with other government agencies (Ministry of Industry) and other related organization.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
Will be considered	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
Need engagement and coordination with involved authority and stakeholders.	
Industry to complete	
Has it been easy to access all necessary information for compliance?	
Some regulation can be accessed from several international website.	
Do you see any specific issues that are limiting the progress of GHS implementation / transport regulation?	
<ul style="list-style-type: none"> Lack of awareness in some remote areas. It is necessary to raise awareness and capacity building for local government officers. 	
What are the expected costs for industry in the implementation of GHS / transport regulations?	
Cost for developing label and packaging material to comply with GHS.	
What are the expected benefits for industry through the implementation of GHS / transport regulations?	
To support the supply chain of chemicals and to reduce costs.	

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	Ministry of Agriculture, Republic of Indonesia Directorate General of Agriculture Infrastructure Pesticide Committee / Directorate of Fertilizer and Pesticide
Contact person	Mrs. Suprpti / Mrs. Lolitha
Phone number	+62 21 789 0043 / +62 21 781 0044
E-mail address	lolitha@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 labeling 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 Number 23/M-IND/PER/4/2013 which has been legalized (but pending on FAO/WHO harmonization work). The transition arrangements were regulated by releasing the Decree of Director General of Manufacturing Industry Base of the MOI (which has been legalized) No.04/BIM/1/2014 dated 28th January 2014 concerning Technical Guidance and Surveillance Control of GHS implementation including the date as mandatory provision.	
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 overlayed 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).
Industry to complete
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

2014 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 Friday 14 March 2014. This is to enable the progress report to be developed and circulated to the CD out-of-session for approval prior to forwarding to Ministers in May 2014.

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.

Four GHS implementation reports have been finalized so far – 2009, 2010/11, 2012 and 2013. Summary of implementation progress was compiled for APEC Ministers in 2009, 2011, 2012 and 2013 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 2014 report will also be made available on the GREAT website.

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 2013). And METI also developed guidance for chemical mixture as "GHS Classification Guidance for Enterprises" in 2009 (it was revised in 2013). These guidances are available both in Japanese and in English. (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 2014, 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. <div> <div><Summary of revision of PRTR Law></div> <div> <div>-The information which is required in SDS expanded to 16 headings as GHS.</div> <div>-Labelling became effort-obligation.</div> <div>-Japanese Industrial Standard (JIS) Z7253 which covers Labelling and SDS became effort-obligation to follow. etc.</div> </div> <div> <div><Summary of revision of ISHL ></div> <div> <div>-SDS and labelling of chemicals were expanded as effort-obligation basis as of 1 April 2012;</div> <div>-JIS Z7253 is recommended as an example to comply with the amended ordinance.</div> </div> </div> </div> 	
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. Ryutaro Kaneko
Phone number	+81-3-3502-6756
E-mail address	kaneko-ryuutarou@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 has classified approximately 3,000 substances, including approximately 1,400 substances regulated by the relevant Japanese laws, since 2006. METI and MHLW classified the substances with regards to the hazard for a physical and human health and MOE classified them with regards to the hazard for aquatic environment and ozone layer. Japanese government and NITE also have already translated approximately 2,000 of them into English and will continue translation of the remaining substances. The classification results are published and 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/). 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 release the computer software for GHS classification of mixtures based on the 4th revision of GHS Purple Book and 'Building Block approach' in Japan in 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. Ryutaro Kaneko
Phone number	+81-3-3502-6756
E-mail address	kaneko-ryuutarou@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 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>GHS for consumer products is not mandatory in Japan, therefore, voluntary approaches are considered to be much important and several guidance documents and other tools are available.</p> <p>As for consumer products, the inter-ministerial committee in Japan decided to adopt risk-based labelling (Annex 5) for consumer products in 2007, and the guidance document was prepared in 2008. The English version of guidance document is available from http://www.safe.nite.go.jp/english/ghs/consumer_product.html. Also calculation tool for consumer products has been published; the title of it: The Program for the Estimation Human Exposure Used in the Risk Assessment of Consumer Products, As some industry activity, e.g. Japan Soap and Detergent Association developed the guidance document for their products http://jsda.org/w/e_engls/e_ghs01.html, and as a different toll.</p> <p>It is easy to access the information for an expert of GHS in Japan.</p>
Do you see any specific issues that are limiting the progress of GHS implementation?
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. Masashi KUSUKAWA 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.
Industry to complete
Has it been easy to access all necessary information for compliance?
Do you see any specific issues that are limiting the progress of GHS implementation?
What are the expected costs for industry in the implementation of GHS?
What are the expected benefits for industry through the implementation of GHS?

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) +81-3-5253-8737
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 overlayed on top of GHS classification on the label? If yes, how will it work?			
Is there to be a maximum number of the following included on the SDS and the label?			
Pictograms			
Hazard statements			
Precautionary statements			
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?			
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?			
Do you have training and awareness activities planned? If yes, please provide some information.			
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?			
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.			
Industry to complete			
Has it been easy to access all necessary information for compliance?			
Do you see any specific issues that are limiting the progress of GHS implementation / transport regulation?			
What are the expected costs for industry in the implementation of GHS / transport regulations?			
What are the expected benefits for industry through the implementation of GHS / transport regulations?			

2014 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 Friday 14 March 2014. This is to enable the progress report to be developed and circulated to the CD out-of-session for approval prior to forwarding to Ministers in May 2014.

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.

Four GHS implementation reports have been finalized so far – 2009, 2010/11, 2012 and 2013. Summary of implementation progress was compiled for APEC Ministers in 2009, 2011, 2012 and 2013 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 2014 report will also be made available on the GREAT website.

General

Please provide the Economy for which this Template is completed below.	
Malaysia	
Does your Economy intend to adopt and implement GHS for any chemical sector in the near future (Starting work within the next 2 years)?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<i>If yes, go to next question. If no, no further answers are required.</i>	
Is there an overall strategic plan for GHS implementation?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, where can it be found? Please list websites, attach documents, etc.	
www.miti.gov.my	
Do you have a GHS coordinator to facilitate implementation discussions within your economy?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Ministry of International Trade and Industry
Name	Mr. Muhammad Razman Abu Samah / Mr. Mohd Khairi Mohd Hanafiah
Phone number	+603 62000326 / +603 62000327
E-mail address	razman@miti.gov.my / khairi@miti.gov.my
Website	www.miti.gov.my
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?	
The Environmentally Hazardous Substance (EHS) Registration and it is based on voluntary basis.	

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	Department of Occupational Safety and Health
Contact person	Ir Dr Majahar Abdul Rahman
Phone number	03-88865088
E-mail address	majahar@mohr.gov.my
Website	http://www.dosh.gov.my
When do you plan to implement GHS for this sector?	
Legislations regarding GHS in this sector have already been gazetted on October 11, 2013. It is known as Occupational Safety and Health (Classification, Labelling and Safety Data Sheet of Hazardous Chemicals) Regulations 2013 or CLASS Regulations. However, Industry Code of Practice on Chemicals Classification and Hazard Communication (ICOP CLASS) is still in the process of gazette. It is expected will be gazette on February 2014.	
How long is the phase in period and what are the transition arrangements?	
A transition period of 1 year from the date of ICOP CLASS gazette is given to industries to comply for substances and mixtures.	
Are the main relevant legislations implementing GHS finalized and in operation?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
http://www.federalgazette.agc.gov.my/output/pua_20131011_P%20U%20(A)%20310-peraturan-peraturan%20keselamatan%20dan%20kesihatan%20pekerjaan%20(pengelasan%20pelabelan%20dan%20helaian%20data%20keselamatan%20bahan%20kimia%20berbahaya)%202013.pdf	
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.	
Physical hazards – all except flammable liquids category 4 Health hazards – all except acute toxicity category 5 and aspiration hazard category 2 Environmental hazards – all except hazardous to aquatic environment – acute hazard category 2 & 3.	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide full details of non-GHS criteria being considered for adoption.	
-	
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	Maximum of 6 precautionary statements on the label. No maximum statements specified in the SDS.
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Hierarchy of hazard pictograms	

1) Physical hazards

If the “exploding bomb” applies, the use of the “flame” symbol and “flame over circle” symbol shall optional except in cases when more than one of these hazard pictograms are compulsory. In cases where the “exploding bomb” and “flame” symbol apply, as for self reactive chemical type B and organic peroxides type B, both hazard pictograms are compulsory.

2) Health Hazard

- a) If the “skull and crossbones” symbol applies, the “exclamation mark” symbol shall not appear.
- b) If the “corrosion” symbol applies, the “exclamation mark” symbol shall not appear where it is used for skin or eye irritation.
- c) If the “health hazard” symbol appears for respiratory sensitization, the “exclamation mark” symbol shall not appear where it is used for skin sensitization or for skin or eye irritation.

Hierarchy of hazard statements

- 1) If the chemicals are classified within several hazard classes or differentiation of a hazard class or hazard statements resulting from the classification shall appear on the label, unless there is evident duplication or redundancy.
- 2) In the case of evident duplication or redundancy, the following rules of precedence shall apply;
 - a) If hazard statement H410 “Very toxic to aquatic life with long lasting effects” is assigned, the statement H400 “Very toxic to aquatic life” shall not appear on the label.
 - b) The hazard statement H314 “Causes severe skin burns and eye damage” is assigned, the statement H318 “Causes serious eye damage” shall not appear on the label.

Hierarchy of precautionary statements

- 1) Precautionary statement consists of precautionary statements covering prevention, response, storage and disposal.
- 2) Not more than 6 precautionary statements shall appear on the label unless necessary to reflect the nature and the severity of the hazards. Redundant information may be omitted. Where a hazard classification results in duplicate precautionary statements, the information shall only appear once. For example, where the precautionary statements “wear face protection” and “wear gloves and face protection” are specified, then only the latter statement shall appear on the label as it relates to the more stringent protective measures.
- 3) Where a chemical is classified for a number of health hazards, generally the most stringent set of the precautionary statements shall be selected. This applies mainly for the preventive measures. With respect to statement concerning “response”, rapid action may be crucial. For example if a chemical is carcinogenic and acutely toxic, then the first aid measures for acute toxicity will take precedence over those for longer terms effects. In addition, medical attention to delayed health effects may be required in cases of incidental exposure, even if not associated with immediate symptoms of intoxication.

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?

The CLASS Regulations have already included the importer as one of the chemical suppliers responsible. Thus, it has become the responsibility of the importer to ensure the imported chemical product adheres to the legislations.

Do you have training and awareness activities planned? If yes, please provide some information.
Yes. We have done road shows to train our officers and are planning to continue with programs to further train them. We have also engaged the industries and conduct training sessions with them and are planning to continue having a few other sessions with the industries. We are also planning to have some compliance support programs to help the SMEs to implement CLASS Regulations.
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?
Looking forward to learn directly from countries already to implement GHS based legislation but so far no definite arrangement.
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
We are expecting to face issues regarding the classification of unique mixtures. Testing will be required if bridging principles could not be applied. Testing facilities available are very limited to cater for the need of upcoming surge of demand.
<i>Industry to complete</i>
Has it been easy to access all necessary information for compliance?
The information can be easily accessible through website of the regulators. There are also seminars and meetings that will be held to inform on rules and regulations that will be gazetted.
Do you see any specific issues that are limiting the progress of GHS implementation?
The cost associated in complying with the rules and regulations and expertise.
What are the expected costs for industry in the implementation of GHS?
There will be an increment in the cost of production to comply with the rules and regulations in term of administration fees, human resources and capital expenditure.
What are the expected benefits for industry through the implementation of GHS?
The compliance to the rules and regulations will facilitate the way of doing business internationally with other economies.

Consumer Products

Regulator to complete	
Do you intend to implement GHS for this sector?	
<input checked="" type="checkbox"/> Yes , but subject to public consultation outcome <input type="checkbox"/> No	
<i>If yes, please provide the following details. If no, no further answers are required for this sector.</i>	
Lead Government Agency	Ministry of Domestic Trade, Co-operatives and Consumerism Malaysia
Contact person	Dr. Mohd Khalid Abdul Samad / Ms. Thiagaletchumi V Maniam
Phone number	+603-8882 6962 / +603-8882 5862
E-mail address	khalid.samad@kpdnkk.gov.my / letchumi@kpdnkk.gov.my
Website	www.kpdnkk.gov.my
When do you plan to implement GHS for this sector?	
Still under discussion.	
How long is the phase in period and what are the transition arrangements?	
Still under discussion.	
Are the main relevant legislations finalized?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
NA	
Do you intend to adopt all hazard classification building blocks GHS as is written in the purple book?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please describe the building blocks that will be adopted.	
NA	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, please provide full details of non-GHS criteria being considered for adoption.	
NA	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
Still under discussion.	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	Still under discussion.
Hazard statements	Still under discussion.
Precautionary statements	Still under discussion.
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Still under discussion.	
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?	
Still under discussion.	
Do you have training and awareness activities planned? If yes, please provide some information.	
Still under discussion.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	

Still under discussion.
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
<ol style="list-style-type: none"> 1. Lack of technical experts who are competent (including trainers) in private and public sectors that are able to classify chemicals mainly for finished product; 2. Lack of a complete database on chemicals related to GHS in Malaysia; 3. Lack of commitment from industry players; 4. Lack of understanding and training among industry players with regards to the implementation of the GHS especially for finished goods; and 5. The industry players are proposing different type of implementation for different finished goods.
Industry to complete
Has it been easy to access all necessary information for compliance?
The information can be accessible through website of the regulators. There are also seminars and meetings that will be held to inform on rules and regulations that will be gazetted.
Do you see any specific issues that are limiting the progress of GHS implementation?
The cost associated in complying with the rules and regulations and expertise.
What are the expected costs for industry in the implementation of GHS?
There will be an increment in the cost of production to comply with the rules and regulations in term of administration fees, human resources and capital expenditure.
What are the expected benefits for industry through the implementation of GHS?
The compliance to the rules and regulations will facilitate the way of doing business internationally with other economies.

Agriculture

<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 sector.</i>	
Lead Government Agency	Department of Agriculture, Ministry of Agriculture
Contact person	Ms. Atikah Abdul KadirJailani
Phone number	03-2030 1480
E-mail address	atikah@doa.gov.my
Website	www.doa.gov.my
When do you plan to implement GHS for this sector?	
As for agriculture sector in Malaysia, we develop rules and regulations on classification and labeling based on Food and Agriculture Organization (FAO) of United Nations. The FAO is currently well accepted in the region.	
Nevertheless, we are willing to consider working on GHS based classification when needed.	
How long is the phase in period and what are the transition arrangements?	
Not applicable at the moment	
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?	
Not applicable at the moment	
Do you intend to adopt all hazard classification building blocks of GHS as is written in the purple book?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitizers. If no, please describe the building blocks that will be adopted.	
Not applicable at the moment	
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.	
Not applicable at the moment	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
The labeling use based on FAO indicate the formulation, usage, recommended crops, direction of use, statement of warnings, first aid, container disposal and net content of the pesticide and only relevant pictograms will be put on the container.	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	Yes
Hazard statements	Yes
Precautionary statements	Yes
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Not applicable at the moment	
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.
Not applicable at the moment
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?
Not applicable at the moment
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
The classification and labeling of pesticide for agriculture use is based on the FAO that currently well accepted in the region. Nevertheless, we are still waiting for FAO review on the classification and labeling based on GHS.
<i>Industry to complete</i>
Has it been easy to access all necessary information for compliance?
The information can be accessible through website of the regulators.
Do you see any specific issues that are limiting the progress of GHS implementation?
Malaysia is currently adapting to the FAO Rules and regulations and still waiting updates based on GHS for classification and labeling of pesticides.
What are the expected costs for industry in the implementation of GHS?
There will be an increment in the cost of production to comply with the rules and regulations in term of administration fees, human resources and capital expenditure.
What are the expected benefits for industry through the implementation of GHS?
The compliance to the rules and regulations will facilitate the way of doing business internationally with other economies.

Transport

Regulator to complete	
Do you intend to implement GHS for this sector (based on the UN "Purple book"), or implement Dangerous Goods transport regulations based on the UN "Orange Book" or not at all? (Please tick one of the following three boxes)	
<input checked="" type="checkbox"/> Implement Dangerous Goods (DG) transport regulations based on the UN "Orange Book"	
<input type="checkbox"/> Implement GHS based on the UN "Purple Book"	
<input type="checkbox"/> No, do not intend to implement GHS	
<i>If implementing DG transport regulations based on the UN "Orange Book", please complete Section 1 and 2. If implementing GHS based on the UN "Purple Book" please complete Section 1 and 3. If not implementing either, no further answers are required for this sector.</i>	
Section 1	
Please fill out the following details of the government agency responsible for the transport of chemicals	
Lead Government Agency	Ministry of Transport
Contact person	Mr. Nur Muhamad Muhamad Jamil
Phone number	+603 88866149
E-mail address	muhamad@mot.gov.my
Website	www.mot.gov.my
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.	
For transportation sector, Malaysia is in the process of drafting the rules and regulations based on The European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR). The rules and regulations are expected to be gazette within 2014.	
Section 3	
When do you plan to implement GHS for this sector?	
NA	
How long is the phase in period and what are the transition arrangements?	
NA	
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?	
NA	
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.	
NA	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide full details of non-GHS criteria being considered for adoption.	
NA	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes,	

how will it work?	
NA	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
NA	
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?	
NA	
Do you have training and awareness activities planned? If yes, please provide some information.	
NA	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
NA	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
NA	
Industry to complete	
Has it been easy to access all necessary information for compliance?	
The rules and regulations is still in the drafting process	
Do you see any specific issues that are limiting the progress of GHS implementation?	
The cost associated in complying with the rules and regulations and expertise.	
What are the expected costs for industry in the implementation of GHS?	
There will be an increment in the cost of production to comply with the rules and regulations in term of administration fees, human resources and capital expenditure.	
What are the expected benefits for industry through the implementation of GHS?	
The compliance to the rules and regulations will facilitate the way of doing business internationally with other economies.	

2014 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 Friday 14 March 2014. This is to enable the progress report to be developed and circulated to the CD out-of-session for approval prior to forwarding to Ministers in May 2014.

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.

Four GHS implementation reports have been finalized so far – 2009, 2010/11, 2012 and 2013. Summary of implementation progress was compiled for APEC Ministers in 2009, 2011, 2012 and 2013 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 2014 report will also be made available on the GREAT website.

General

Please provide the Economy for which this Template is completed below.	
The Russian Federation	
Does your Economy intend to adopt and implement GHS for any chemical sector in the near future (Starting work within the next 2 years)?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No , but we intend to review our existing national standard in accordance with the 4th revised edition of GHS. The Revised standards will come into force in August 2014.
<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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	Ministry of Industry and Trade of the Russian Federation
Name	Mr. Sergey Tsyb
Phone number	+7 (495) 980-28-44
E-mail address	Contacts on the website
Website	http://www.minpromtorg.gov.ru/
Do you have a hazard classification database?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, is it mandatory classification, or for information only? How do you access the database?	

Industrial Workplace

<i>Regulator to complete</i>	
Do you intend to implement GHS for this sector?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No , GHS was already implemented through national and international (for CIS Countries) standards. But we intend to revise the existing standards for their compliance with the 4th edition of GHS. Revised standards will have international (for CIS Countries) status.
<i>If yes, please provide the following details. If no, no further answers are required for this section.</i>	
Lead Government Agency	Ministry of Industry and Trade of the Russian Federation
Contact person	Mr. Sergey Tsyb
Phone number	+7 (495) 980-28-44
E-mail address	Contacts on the website
Website	http://www.minpromtorg.gov.ru/
When do you plan to implement GHS for this sector?	
Revised standards will come into force in August 2014.	
How long is the phase in period and what are the transition arrangements?	
Currently the standards are voluntary. The standards will become mandatory only after entry into force of the Technical Regulation "On Safety of Chemical Products" which expected to be in February 2015. The transition period will be a year and a half (until November, 2016).	
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>1) GOST R 53856-2010: Classification of chemicals hazard. General requirements http://www.standards.ru/document/4571589.aspx</p> <p>2) GOST R 53857-2010: Classification of chemicals for environmental hazards. General principles http://www.standards.ru/document/4574573.aspx</p> <p>3) GOST R 53854-2010: Classification of chemical mixtures hazard for health http://www.standards.ru/document/4571588.aspx</p> <p>4) GOST R 53858-2010: Classification of chemical mixtures hazard for the environmental http://www.standards.ru/document/4571576.aspx</p> <p>5) GOST 30333-2007: Chemical production safety passport. General requirements http://www.standards.ru/document/4191468.aspx</p> <p>6) GOST 31340-2007: Labelling of chemicals. General requirements http://www.standards.ru/document/4191522.aspx</p> <p>Currently the standards on safety passport and labelling are in compliance with the 1st revised edition of GHS. Standards on classification are in compliance with the 3rd revised edition of GHS. All these standards will be replaced by new ones according to the 4th revised edition of GHS (expected to be August 2014) with all hazard classes and categories.</p>	
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 , we have already adopted them
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>Explosive: classes 1-6 instead of divisions 1.1-1.6</p> <p>Absence of Cat 3 for Aerosols</p> <p>Additional classification for self-reactive substances and mixtures and for organic peroxides (class 1 – type A, class 2 – type B etc)</p> <p>Respiratory and skin sensitization without division into sub-category</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 , we have already adopted them
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Additional scoping criteria for skin corrosion/irritation and serious eye damage/eye irritation	

according to the national guidelines	
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	Not limited
Hazard statements	Not limited
Precautionary statements	Not limited until the revised standard on labelling enters into force (August 2014). Recommended number will be not more six ones, unless necessary to reflect the nature and the severity of the hazards
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
The precedence for allocation of symbols and hazard statements is established in GOST 31340 and corresponded to GHS.	
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?	
According to Resolution by the EEC #229 from 28.05.2010, all imported chemicals from section II of list (http://www.tsouz.ru/KTS/KTS17/Pages/P1_299.aspx) must be in compliance with sanitary-epidemiological and hygienic requirements and this compliance must be confirmed by state registration.	
Do you have training and awareness activities planned? If yes, please provide some information.	
Trainings on classification and labelling are provided by CIS Center on regular basis. For more information, please visit website http://www.ciscenter.ru/ru/	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
No, but the Russian Federation is a participant of different international activities, including APEC CD, Sub-Committee of Experts on the GHS, OECD pilot exercises on classification (CoCAM-4, CoCAM-5)	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
Due implementation we faced with the following concerns:	
1) Russian laboratories has no appropriate equipment for testing according to GHS	
2) Industry is not ready to comply with the GHS requirements because of absence of data on chemicals for comparison with the GHS criteria	
3) The lack of understanding by industry of GHS necessity	
<i>Industry to complete</i>	
Has it been easy to access all necessary information for compliance?	
Not always	
Do you see any specific issues that are limiting the progress of GHS implementation?	
Absence of appropriate laboratory for testing according to GHS, the high cost of testing	
What are the expected costs for industry in the implementation of GHS?	
Depends on size of enterprise: the greater manufacture, the higher cost of compliance with GHS. In average it's rather high.	
What are the expected benefits for industry through the implementation of GHS?	
Hazard communication through the supply chain; informing of consumers	
In case of export: harmonization with the international hazard assessment approach.	
Harmonized labelling.	

Consumer Products

Regulator to complete	
Do you intend to implement GHS for this sector?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No , GHS was already implemented through national and international (for CIS Countries) standards. But we intend to revise the existing standards for their compliance with the 4th edition of GHS. Revised standards will have international (for CIS Countries) status.
<i>If yes, please provide the following details. If no, no further answers are required for this sector.</i>	
Lead Government Agency	Ministry of Industry and Trade of the Russian Federation
Contact person	Mr. Sergey Tsyb
Phone number	+7 (495) 980-28-44
E-mail address	Contacts on the website
Website	http://www.minpromtorg.gov.ru/
When do you plan to implement GHS for this sector?	
Revised standards will come into force in August 2014	
How long is the phase in period and what are the transition arrangements?	
Currently the standards are voluntary. The standards will become mandatory only after entry into force of the Technical Regulation "On Safety of Chemical Products" which expected to be in February 2015. The transition period will be a year and a half (until November, 2016).	
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?	
1) GOST R 53856-2010: Classification of chemicals hazard. General requirements http://www.standards.ru/document/4571589.aspx 2) GOST R 53857-2010: Classification of chemicals for environmental hazards. General principles http://www.standards.ru/document/4574573.aspx 3) GOST R 53854-2010: Classification of chemical mixtures hazard for health http://www.standards.ru/document/4571588.aspx 4) GOST R 53858-2010: Classification of chemical mixtures hazard for the environmental http://www.standards.ru/document/4571576.aspx 5) GOST 30333-2007: Chemical production safety passport. General requirements http://www.standards.ru/document/4191468.aspx 6) GOST 31340-2007: Labelling of chemicals. General requirements http://www.standards.ru/document/4191522.aspx Currently the standards on safety passport and labelling are in compliance with the 1st revised edition of GHS. Standards on classification are in compliance with the 3rd revised edition of GHS. All these standards will be replaced by new ones according to the 4th revised edition of GHS (expected to be August 2014) with all hazard classes and categories.	
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 , we have already adopted them
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.	
Explosive: classes 1-6 instead of divisions 1.1-1.6 Absence of Cat 3 for Aerosols Additional classification for self-reactive substances and mixtures and for organic peroxides (class 1 – type A, class 2 – type B etc) Respiratory and skin sensitization without division into sub-category	
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 , we have already adopted them
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Additional scoping criteria for skin corrosion/irritation and serious eye damage/eye irritation according to the national guidelines	

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	Not limited
Hazard statements	Not limited
Precautionary statements	Not limited until the revised standard on labelling enters into force (August 2014). Recommended number will be not more six ones, unless necessary to reflect the nature and the severity of the hazards
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
The precedence for allocation of symbols and hazard statements is established in GOST 31340 and corresponded to GHS.	
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?	
According to Resolution by the EEC #229 from 28.05.2010, all imported consumer products from section II of list (http://www.tsouz.ru/KTS/KTS17/Pages/P1_299.aspx) must be in compliance with sanitary-epidemiological and hygienic requirements and this compliance must be confirmed by state registration.	
Do you have training and awareness activities planned? If yes, please provide some information.	
Trainings on classification and labelling are provided by CIS Center on regular basis. For more information, please visit website http://www.ciscenter.ru/ru/	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
No, but the Russian Federation is a participant of different international activities, including APEC CD, Sub-Committee of Experts on the GHS, OECD pilot exercises on classification (CoCAM-4, CoCAM-5)	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
Due implementation we faced with the following concerns: 1) Russian laboratories has no appropriate equipment for testing according to GHS 2) Industry is not ready to comply with the GHS requirements because of absence of data on chemicals for comparison with the GHS criteria 3) The lack of understanding by industry of GHS necessity	
<i>Industry to complete</i>	
Has it been easy to access all necessary information for compliance?	
Not always	
Do you see any specific issues that are limiting the progress of GHS implementation?	
Absence of appropriate laboratory for testing according to GHS, the high cost of testing	
What are the expected costs for industry in the implementation of GHS?	
Depends on size of enterprise: the greater manufacture, the higher cost of compliance with GHS. In average it's rather high.	
What are the expected benefits for industry through the implementation of GHS?	
Hazard communication through the supply chain; informing of consumers In case of export: harmonization with the international hazard assessment approach. Harmonized labelling.	

Agriculture

<i>Regulator to complete</i>	
Do you intend to implement GHS for this sector?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No , GHS was already implemented through national and international (for CIS Countries) standards. But we intend to revise the existing standards for their compliance with the 4th edition of GHS. Revised standards will have international (for CIS Countries) status.
<i>If yes, please provide the following details. If no, no further answers are required for this sector.</i>	
Lead Government Agency	Ministry of Industry and Trade of the Russian Federation
Contact person	Mr. Sergey Tsyb
Phone number	+7 (495) 980-28-44
E-mail address	Contacts on the website
Website	http://www.minpromtorg.gov.ru/
When do you plan to implement GHS for this sector?	
Revised standards will come into force in August 2014	
How long is the phase in period and what are the transition arrangements?	
Currently the standards are voluntary. The standards will become mandatory only after entry into force of the Technical Regulation "On Safety of Chemical Products" which expected to be in February 2015. The transition period will be a year and a half (until November, 2016).	
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>1) GOST R 53856-2010: Classification of chemicals hazard. General requirements http://www.standards.ru/document/4571589.aspx</p> <p>2) GOST R 53857-2010: Classification of chemicals for environmental hazards. General principles http://www.standards.ru/document/4574573.aspx</p> <p>3) GOST R 53854-2010: Classification of chemical mixtures hazard for health http://www.standards.ru/document/4571588.aspx</p> <p>4) GOST R 53858-2010: Classification of chemical mixtures hazard for the environmental http://www.standards.ru/document/4571576.aspx</p> <p>5) GOST 30333-2007: Chemical production safety passport. General requirements http://www.standards.ru/document/4191468.aspx</p> <p>6) GOST 31340-2007: Labelling of chemicals. General requirements http://www.standards.ru/document/4191522.aspx</p> <p>Currently the standards on safety passport and labelling are in compliance with the 1st revised edition of GHS. Standards on classification are in compliance with the 3rd revised edition of GHS. All these standards will be replaced by new ones according to the 4th revised edition of GHS (expected to be August 2014) with all hazard classes and categories.</p>	
Do you intend to adopt all hazard classification building blocks of GHS as is written in the purple book?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No , we have already adopted them
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>Explosive: classes 1-6 instead of divisions 1.1-1.6</p> <p>Absence of Cat 3 for Aerosols</p> <p>Additional classification for self-reactive substances and mixtures and for organic peroxides (class 1 – type A, class 2 – type B etc)</p> <p>Respiratory and skin sensitization without division into sub-category</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, we have already adopted them	
If yes, please provide full details of non-GHS criteria being considered for adoption.			
Additional scoping criteria for skin corrosion/irritation and serious eye damage/eye irritation according to the national guidelines			
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	Not limited		
Hazard statements	Not limited		
Precautionary statements	Not limited until the revised standard on labelling enters into force (August 2014). Recommended number will be not more six ones, unless necessary to reflect the nature and the severity of the hazards		
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?			
The precedence for allocation of symbols and hazard statements is established in GOST 31340 and corresponded to GHS.			
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?			
According to Resolution by the EEC #229 from 28.05.2010, all imported pesticides and agrochemicals and chemicals from section II of list (http://www.tsouz.ru/KTS/KTS17/Pages/P1_299.aspx) must be in compliance with sanitary-epidemiological and hygienic requirements and this compliance must be confirmed by state registration.			
Do you have training and awareness activities planned? If yes, please provide some information.			
Trainings on classification and labelling are provided by CIS Center on regular basis. For more information, please visit website http://www.ciscenter.ru/ru/			
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?			
No, but the Russian Federation is a participant of different international activities, including APEC CD, Sub-Committee of Experts on the GHS, OECD pilot exercises on classification (CoCAM-4, CoCAM-5)			
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.			
Due implementation we faced with the following concerns: 1) Russian laboratories has no appropriate equipment for testing according to GHS 2) Industry is not ready to comply with the GHS requirements because of absence of data on chemicals for comparison with the GHS criteria 3) The lack of understanding by industry of GHS necessity			
<i>Industry to complete</i>			
Has it been easy to access all necessary information for compliance?			
Not always			
Do you see any specific issues that are limiting the progress of GHS implementation?			
Absence of appropriate laboratory for testing according to GHS, the high cost of testing			
What are the expected costs for industry in the implementation of GHS?			
Depends on size of enterprise: the greater manufacture, the higher cost of compliance with GHS. In average it's rather high.			
What are the expected benefits for industry through the implementation of GHS?			
Hazard communication through the supply chain; informing of consumers In case of export: harmonization with the international hazard assessment approach. Harmonized labelling.			

Transport

Regulator to complete	
Do you intend to implement GHS for this sector (based on the UN "Purple book"), or implement Dangerous Goods transport regulations based on the UN "Orange Book" or not at all? (Please tick one of the following three boxes)	
<input checked="" type="checkbox"/> Implement Dangerous Goods (DG) transport regulations based on the UN "Orange Book"	
<input checked="" type="checkbox"/> Implement GHS based on the UN "Purple Book"	
<input type="checkbox"/> No, do not intend to implement GHS	
<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	Central Marine Research & Design Institute (CNIIMF)
Contact person	Mr. Yury Ivanov
Phone number	+7 (812) 275-8947
E-mail address	Contacts on the website
Website	http://www.cniimf.ru/info.htm
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>1) GOST R 54515-2011: Classification of chemicals hazardous due to their physical and chemical properties. Test of oxidizing chemicals in solid state http://www.standards.ru/document/4681634.aspx</p> <p>2) GOST R 54516-2011: Classification of chemicals hazardous due to their physical and chemical properties. Test of oxidizing liquids http://www.standards.ru/document/4681648.aspx</p> <p>3) GOST R 54506-2011: Classification of chemicals hazardous due to their physical and chemical properties. Test method for ignition in a confined space http://www.standards.ru/document/4681620.aspx</p> <p>4) GOST R 54510-2011: Classification of chemicals hazardous due to their physical and chemical properties. Test method for flammability of aerosol foam http://www.standards.ru/document/4681633.aspx</p> <p>5) GOST R 54513-2011: Classification of chemicals hazardous due to their physical and chemical properties. Test method for pyrophoric liquids http://www.standards.ru/document/4681656.aspx</p> <p>6) GOST R 54508-2011: Classification of chemicals hazardous due to their physical and chemical properties. Test method for pyrophoric solids http://www.standards.ru/document/4681636.aspx</p> <p>7) GOST R 54507-2011: Classification of chemicals hazardous due to their physical and chemical properties. Test method for spray aerosols to determine the distance at which ignition occurs http://www.standards.ru/document/4681628.aspx</p> <p>8) GOST R 54511-2011: Classification of chemicals hazardous due to their physical and chemical properties. Method of determining the corrosive properties of chemicals http://www.standards.ru/document/4681622.aspx</p> <p>9) GOST R 54514-2011: Classification of chemicals hazardous due to their physical and chemical properties. Method of determining of ability of chemicals to the oxidative self-heating http://www.standards.ru/document/4681625.aspx</p> <p>10) GOST R 54517-2011: Classification of chemicals hazardous due to their physical and chemical properties. Test methods of flammable chemicals in solid state http://www.standards.ru/document/4681662.aspx</p>	

11) GOST R 54509-2011: Classification of chemicals which hazard is caused by physical and chemical properties. Test methods of chemicals, which consists of organic matter (self-reactive chemicals and organic peroxides) http://www.standards.ru/document/4681676.aspx	
12) GOST R 54512-2011: Classification of chemicals hazardous due to their physical and chemical properties. Determination of ability of chemicals to emit flammable gases in contact with water http://www.standards.ru/document/4681629.aspx	
Section 3	
When do you plan to implement GHS for this sector?	
Revised standards will come into force in August 2014	
How long is the phase in period and what are the transition arrangements?	
Currently the standards are voluntary. The standards will become mandatory only after entry into force of the Technical Regulation "On Safety of Chemical Products" which expected to be in February 2015. The transition period will be a year and a half (until November, 2016).	
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?	
1) GOST R 53856-2010: Classification of chemicals hazard. General requirements http://www.standards.ru/document/4571589.aspx 2) GOST R 53857-2010: Classification of chemicals for environmental hazards. General principles http://www.standards.ru/document/4574573.aspx 3) GOST R 53854-2010: Classification of chemical mixtures hazard for health http://www.standards.ru/document/4571588.aspx 4) GOST R 53858-2010: Classification of chemical mixtures hazard for the environmental http://www.standards.ru/document/4571576.aspx 5) GOST 30333-2007: Chemical production safety passport. General requirements http://www.standards.ru/document/4191468.aspx 6) GOST 31340-2007: Labelling of chemicals. General requirements http://www.standards.ru/document/4191522.aspx Currently the standards on safety passport and labelling are in compliance with the 1 st revised edition of GHS. Standards on classification are in compliance with the 3 rd revised edition of GHS. All these standards will be replaced by new ones according to the 4 th revised edition of GHS (expected to be August 2014) with all hazard classes and categories.	
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, we have already adopted them
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.	
Explosive: classes 1-6 instead of divisions 1.1-1.6 Absence of Cat 3 for Aerosols Additional classification for self-reactive substances and mixtures and for organic peroxides (class 1 – type A, class 2 – type B etc) Respiratory and skin sensitization without division into sub-category	
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, we have already adopted them
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Additional scoping criteria for skin corrosion/irritation and serious eye damage/eye irritation according to the national guidelines	
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	Not limited
Hazard statements	Not limited
Precautionary statements	Not limited until the revised standard on labelling enters into force (August 2014). Recommended number will be not more six ones, unless necessary to reflect the nature and the severity of the hazards
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
The precedence for allocation of symbols and hazard statements was established in GOST 31340 and corresponded to the GHS. Where a transport pictogram appears on a label, a GHS pictogram for the same hazard should not appear.	
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?	
According to Resolution by the EEC #229 from 28.05.2010, all imported chemicals/products from section II of list (http://www.tsouz.ru/KTS/KTS17/Pages/P1_299.aspx) must be in compliance with sanitary-epidemiological and hygienic requirements and this compliance must be confirmed by state registration.	
Do you have training and awareness activities planned? If yes, please provide some information.	
Trainings on classification and labelling are provided by CIS Center on regular basis. For more information, please visit website http://www.ciscenter.ru/ru/	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
No, but the Russian Federation is a participant of different international activities, including APEC CD, Sub-Committee of Experts on the GHS, OECD pilot exercises on classification (CoCAM-4, CoCAM-5)	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
Due implementation we faced with the following concerns: 1) Russian laboratories has no appropriate equipment for testing according to GHS 2) Industry is not ready to comply with the GHS requirements because of absence of data on chemicals for comparison with the GHS criteria 3) The lack of understanding by industry of GHS necessity	
<i>Industry to complete</i>	
Has it been easy to access all necessary information for compliance?	
Not always	
Do you see any specific issues that are limiting the progress of GHS implementation / transport regulation?	
Absence of appropriate laboratory for testing according to GHS, the high cost of testing	
What are the expected costs for industry in the implementation of GHS / transport regulations?	
Depends on size of enterprise: the greater manufacture, the higher cost of compliance with GHS. In average it's rather high.	
What are the expected benefits for industry through the implementation of GHS / transport regulations?	
Hazard communication through the supply chain; informing of consumers In case of export: harmonization with the international hazard assessment approach. Harmonized classification and labelling.	

2014 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 Friday 14 March 2014. This is to enable the progress report to be developed and circulated to the CD out-of-session for approval prior to forwarding to Ministers in May 2014.

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.

Four GHS implementation reports have been finalized so far – 2009, 2010/11, 2012 and 2013. Summary of implementation progress was compiled for APEC Ministers in 2009, 2011, 2012 and 2013 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 2014 report will also be made available on the GREAT website.

General

Please provide the Economy for which this Template is completed below.	
Singapore	
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	<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.	
Relevant information can be found in www.wshc.sg/ghs	
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	Ministry of Manpower
Name	Veronica Chow
Phone number	66925054
E-mail address	Veronica_chow@mom.gov.sg
Website	www.mom.gov.sg
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 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 Manpower																						
Contact person	Veronica Chow																						
Phone number	66925054																						
E-mail address	Veronica_chow@mom.gov.sg																						
Website	www.mom.gov.sg																						
When do you plan to implement GHS for this sector?																							
GHS Implementation Deadlines <table border="1"> <thead> <tr> <th>Phase</th> <th>Deadline</th> <th>Target Industry</th> <th>Requirement</th> </tr> </thead> <tbody> <tr> <td>1A</td> <td>Feb 2012</td> <td>All Chemical Manufacturers & Suppliers</td> <td>Preparation of GHS SDSs & Labels for Single Substances.</td> </tr> <tr> <td>2A</td> <td>End 2012</td> <td>All Users of Chemicals</td> <td>GHS Labelling of Containers for Single Substances.</td> </tr> <tr> <td>1B</td> <td>Mid 2015</td> <td>All Chemical Manufacturers & Suppliers</td> <td>Preparation of GHS SDSs & Labels for Mixtures.</td> </tr> <tr> <td>2B</td> <td>Mid 2015</td> <td>All Users of Chemicals</td> <td>GHS Labelling of Containers for Mixtures.</td> </tr> </tbody> </table>				Phase	Deadline	Target Industry	Requirement	1A	Feb 2012	All Chemical Manufacturers & Suppliers	Preparation of GHS SDSs & Labels for Single Substances.	2A	End 2012	All Users of Chemicals	GHS Labelling of Containers for Single Substances.	1B	Mid 2015	All Chemical Manufacturers & Suppliers	Preparation of GHS SDSs & Labels for Mixtures.	2B	Mid 2015	All Users of Chemicals	GHS Labelling of Containers for Mixtures.
Phase	Deadline	Target Industry	Requirement																				
1A	Feb 2012	All Chemical Manufacturers & Suppliers	Preparation of GHS SDSs & Labels for Single Substances.																				
2A	End 2012	All Users of Chemicals	GHS Labelling of Containers for Single Substances.																				
1B	Mid 2015	All Chemical Manufacturers & Suppliers	Preparation of GHS SDSs & Labels for Mixtures.																				
2B	Mid 2015	All Users of Chemicals	GHS Labelling of Containers for Mixtures.																				
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?																							
MOM: Workplace Safety and Health (WSH) Act, WSH (General Provisions) Regulations SPRING Singapore: Singapore Standard 586:2014 –Specification of Hazardous Communication of Hazardous Chemicals and Dangerous Goods. Details of the related legislation and useful links are found in the following links: www.mom.gov.sg/legislation/occupational-safety-health/Pages/default.aspx www.wshc.sg/GHS																							
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.																							
Singapore has chosen not to adopt the following : <ol style="list-style-type: none"> 1. Flammable Gas Cat 4- except Deseal 2. Aspiration hazard Cat 2, Skin irritation Cat 3, Acute Toxicity cat 4 3. Env Acute- Cat 2,3 and Chronic – Cat 3, 4 																							
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?																							
The label will be used in intrinsic hazard classification.																							

Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	Rules of precedence apply
Hazard statements	All on SDS and label
Precautionary statements	All on SDS but 6 (max.no) on label
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
<p>The sections as defined for SDS as per the Purple book requirement. There is no defined format for the label information, is as such:-</p> <ul style="list-style-type: none"> • product identifier, • Pictogram • Hazard statements • Precautionary statements • Supplementary information • Supplier 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?	
Do you have training and awareness activities planned? If yes, please provide some information.	
<ul style="list-style-type: none"> ▪ National GHS Awareness seminars ▪ GHS Users Training Course ▪ GHS Classification for Single Substances Course ▪ GHS Classification for Mixtures Course 	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	
For the time being we do not have such plans.	
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.	
<p>Impact of Purple book revision:-</p> <p>Adoption of the fast changing revision of the Purple book i.e. once in two years, Impact analysis to the nation on the new requirement in the Purple book, Review the existing standards and guidance materials to reflect the changes for the adoption</p> <p>Local Implementation The presence of MNC and SME workplaces in the country have differing degree of challenge in the following areas:-</p> <ol style="list-style-type: none"> 1. Awareness levels of different industry 2. Workplace hazard communication programme for workers 3. Small container labeling <p>Other documentation alignment</p> <ul style="list-style-type: none"> • Alignment of UNRTDG and WHO FAO for pesticides 	
<i>Industry to complete</i>	
Has it been easy to access all necessary information for compliance?	
<p>Guidance resources available are:</p> <ul style="list-style-type: none"> ▪ Previously, Singapore Standards SS586 : 2008 (based on GHS revision 2) on Specification on Hazard Communication for Hazardous Chemicals and Dangerous Goods. 	

<ul style="list-style-type: none"> ▪ Singapore Standards SS 586 had been revised to GHS revision 4 and named as SS586:2014 2014 which launched on 7 Mar 2014. ▪ Guidebook on GHS of Classification and Labelling of Chemicals ▪ Workplace Safety and Health Act (WSHA) and its related legislation can be downloaded from http://www.mom.gov.sg/legislation/occupational-safety-health/Pages/default.aspx ▪ United Nation's GHS document (revision 4) Website ▪ Other country GHS classification website such as Japan METI – NIER website and Europe CLP GHS classification website etc
<p>Do you see any specific issues that are limiting the progress of GHS implementation?</p> <p>Challenges faced:</p> <ul style="list-style-type: none"> ▪ Allocation of manpower and resources ▪ Difficulty in obtaining SDS from suppliers/manufacturers and especially those supplied from overseas ▪ Different countries adopting different building blocks and at different version ▪ Creating awareness to all chemical users and stakeholders ▪ Not easy to obtain and translate specific chemical test data / reports (on certain Health and Environmental hazard class) to carry out the classification. ▪ Limited Technical resources / experts available in the country
<p>What are the expected costs for industry in the implementation of GHS?</p> <p>Expected Costs :</p> <ul style="list-style-type: none"> ▪ Dedicated manpower resources ▪ Time resources ▪ Printing of GHS labels ▪ Classification and Authoring SDS and chemical tests associated to the classification of chemicals ▪ Trainings ▪ Review and change of SDS and GHS labels along the implementation journey (as GHS revised every 2 years) ▪ Since Singapore is a Chemical and Logistic Hub in AP, we are facing challenge to meet with other country GHS requirement. Different country adapt to different GHS revision, adaption to different building block, different labelling format and size and training requirement etc. ▪ The cost will be higher for the initial phase as require more work, resource (manpower), technical experts and change in system design (on SDS and labelling format). Less cost on the run and maintain cost. However, industry also has to cater for the needs for any change to the new GHS revision.
<p>What are the expected benefits for industry through the implementation of GHS?</p> <p>Benefits to industry:</p> <ul style="list-style-type: none"> ▪ A safer work environment ▪ Facilitation of international trade ▪ An increase in efficiency and reduced costs from compliance with multiple regulations ▪ Maximising expert resources and minimizing labour and costs ▪ Reduced costs due to fewer incidents and illnesses ▪ Improved safety for workers and others through consistent communications on chemical hazards and precautions for safe handling and use ▪ Greater awareness of hazards and improved workplace risk assessment resulting in safer use of chemicals ▪ Less confusion when using global suppliers

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 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?
<ul style="list-style-type: none"> Not all country has consumer safety regulation.
Do you see any specific issues that are limiting the progress of GHS implementation?
<ul style="list-style-type: none"> It will take more time and resource to implement. The reason is some industrial chemical will be used as finish products with different pack size. This will be even more difficult to handle in term of the GHS labelling.
What are the expected costs for industry in the implementation of GHS?
<ul style="list-style-type: none"> This will be even higher than for industry products as more resource (i.e. manpower), time and preparation and planning is required to carry out this work. More capacity building and communication require educating the general public on the GHS.
What are the expected benefits for industry through the implementation of GHS?
<ul style="list-style-type: none"> Raise awareness and provide better understanding to consumer about the importance of safe handling and use of chemicals. Reduced costs due to fewer incidents and illnesses Improved safety mindset in consumer through consistent communications on chemical hazards and precautions for safe handling and use Greater awareness of hazards and improved risk assessment resulting in safer use of chemicals

Agriculture

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

implementation?
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
<i>Industry to complete</i>
Has it been easy to access all necessary information for compliance?
Chemicals used in agriculture are currently control under different regulatory requirement in Singapore. Information can refer to the Government website.
Do you see any specific issues that are limiting the progress of GHS implementation?
Classification and even hazardous communication tools such as labelling of Agriculture chemicals is different from GHS scheme. It will take some time to align and get agreement before adding such into the implementation scope.
What are the expected costs for industry in the implementation of GHS?
More time, cost and resource is required to include this area in the GHS implementation. Company will have to adopt and make change to their classification and hazard communication tools in order to comply.
What are the expected benefits for industry through the implementation of GHS?
<ul style="list-style-type: none"> ▪ It will be ideal if we can work on one harmonize system. This could prevent the confusion in the term of the classification, documentation and labelling. ▪ This can also reduce cost & resource as only to maintain 1 system for long turn. ▪ Reduced costs due to fewer incidents and illnesses ▪ Greater awareness of hazards and improved risk assessment resulting in safer use of chemicals

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?	
GHS information is easy available through websites.	
Do you see any specific issues that are limiting the progress of GHS implementation / transport regulation?	
<p>UN RTDG is the main reference and source for the transportation of chemicals which classified as Dangerous Goods in Singapore. UN RTDG (orange book) has been widely use and adopt internationally. Detail requirement is stated on SS586 Part 1.</p> <p>UN RTDG is taking the precedence of GHS in terms of the classification and hazard communication for the DG transportation. Although the cut-off limit, testing requirement as well as pictogram use for the Physical Hazard Classes in GHS has been aligned to UN RTDG, other classes / groups are different.</p> <p>To meet with local requirement, we only need to meet with DG requirement if transport those classified as DG. DG classification not only used in transportation but also used in the storage as well. GHS is more for workplace. There will be certain overlapped of both in the terms of the warehousing and storage of the chemicals. Hence, it is important for us to indicate which one is taking the precedence.</p> <p>It will need more time to communicate and adjust the changes and get align with the two requirements.</p>	
What are the expected costs for industry in the implementation of GHS / transport regulations?	
<ul style="list-style-type: none"> ▪ It will be ideal if we can work on one harmonize system. This will prevent the confusion in the term of the classification, documentation and labelling. ▪ More cost and resource is required in making the change in the system to align with the 2 regulations. ▪ This can also reduce cost, resource to maintain 2 systems. 	

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

- It will be ideal if we can work on one harmonize system. This will prevent the confusion in the term of the classification, documentation and labelling.
- This can also reduce cost and resource as require maintaining one system for long term.
- Reduced costs due to fewer incidents and illnesses
- Greater awareness of hazards and improved risk assessment resulting in safer use of chemicals

2014 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, 2013³⁴.	
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 not published all their HazCom 2012 letters of interpretation, including guidance from the HazCom 2012 litigation settlements.

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

Global Industrial Workplace Issues:

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

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

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

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

- To achieve the goal of harmonization and reap the associated benefits, OSHA/governments should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries. The OSHA final GHS rule is generally aligned with the GHS, but there are several issues that are not aligned, e.g., mandatory precautionary statements, combustible dusts, Hazards, Not Otherwise Classified (HNOCs).
- Collaboration is needed among the U.S. Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the GHS final rule. However, EPA and CPSC are not making progress in implementing the GHS. Although CPSC recently finalized a revised definition of strong sensitizer, 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 HazCom-2012, and based on GHS rev-2.
- More detailed HazCom 2012 guidance from OSHA is needed to assist in implementation. The HazCom 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 needs to publish all their HazCom 2012 letters of interpretation as soon as possible, including

guidance from the HazCom 2012 litigation settlements.

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

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

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

Costs for industry can be reduced by the following:

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

API suggests providing at least the following assistance materials:

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

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

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

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

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

The costs for industry can be reduced by the following:

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

UN Sub-Committee of Experts on the GHS (UNSCEGHS).

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

The differences in GHS mixture classification cutoff values/thresholds between countries are an impediment to harmonization. It might be useful to convene a working group to look at the possibility of providing harmonized GHS mixture classification cutoff values/thresholds. [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 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 GHS has not yet been implemented by the CPSC in the U.S. for consumer products. Information on the progress/status is not readily available to stakeholders. CPSC recently revised their definition of “strong sensitizer”. The accompanying staff guidance document was not easy to access and has not yet been updated to consider comments received during the rule making.

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. CPSC’s recently revised definition of “strong sensitizer” does not use risk in a manner that is consistent with the GHS.
- To achieve the goal of harmonization and reap the associated benefits, governments should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries.
- Collaboration is needed among Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the final GHS rule. However, EPA and CPSC are not making progress in implementing the GHS. Although CPSC recently finalized a revised definition of strong sensitizer, 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 HazCom-2012, and based on GHS rev-2.
- While CPSC recently revised their definition of “strong sensitizer”, the definition, and suggested label elements are not aligned with the GHS/OSHA HazCom 2012. Although the revised “strong sensitizer” definition becomes effective on March 17, 2014, the “strong sensitizer” staff guidance document has not yet been updated to consider comments received during the rule making.

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

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

Costs for industry can be reduced by the following:

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

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

Expected benefits for industry through the implementation of GHS include:

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

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

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

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

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. As EPA starts to incorporate GHS elements into their various regulations, it should be clear to stakeholders when EPA is aligning with OSHA HazCom 2012/GHS and when the EPA requirements deviate from OSHA/GHS, e.g., the proposed updates and revisions to the worker protection regulation for pesticides, e.g., the SDS.

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. Although CPSC recently finalized a revised definition of strong sensitizer, CPSC has stated that GHS implementation is on hold due to other priorities. Non-harmonized issues like HNOCs and combustible dusts add to the cost of doing business internationally.
- As EPA incorporates elements of the GHS into their various regulations ["Protection in the Workplace" (40 CFR 721.63), "Hazard Communication Program" (40 CFR 721.72) and "Agricultural Worker Protection Standard" (40 CFR Part 170)], they should align with OSHA HazCom 2012/GHS as closely as possible, e.g., criteria, definitions, classification, SDS, etc. In EPA's proposed worker protection rule requiring SDSs, the SDSs should have the same

<p><u>classifications, format and information as OSHA HCS 2012 SDSs.</u></p> <ul style="list-style-type: none"> • <u>EPA needs to align their EPCRA/SARA 311/312 (40 CFR 370) reporting requirements with the new OSHA HazCom 2012 hazards.</u>
<p>What are the expected costs for industry in the implementation of GHS?</p> <p>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.</p> <p>Costs for industry can be reduced by the following:</p> <ul style="list-style-type: none"> • 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.
<p>What are the expected benefits for industry through the implementation of GHS?</p> <p>Expected benefits for industry through the implementation of GHS include:</p> <ul style="list-style-type: none"> • 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. <p>The below activities are needed to reduce the potential risks of not achieving benefits:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>

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</p> <p>On April 9, 2012, the Coast Guard published a NPRM which creates a new requirement to specifically require SDSs for cargoes on ships. The format of this NPRM SDS example is inconsistent with the UN’s GHS framework, inconsistent with OSHA’s adoption of the GHS in HCS-2012, and based on GHS rev-2.</p> <p>Information regarding the implementation of the IMO “Recommendations for Material Safety Data Sheets (MSDS) for MARPOL Annex I Oil Cargo and Oil Fuel” (Resolution MSC.286(86)) has not been readily available from the U.S. Coast Guard. Also the information on how the IMO SDS resolution is being implemented globally is not readily available.</p>	
Do you see any specific issues that are limiting the progress of GHS implementation / transport regulation?	
<ul style="list-style-type: none"> • To achieve the goal of harmonization and reap the associated benefits, governments/organizations should align with the GHS as negotiated and seek to implement it in a manner that minimizes differences among countries/organizations. • Collaboration is needed among Coast Guard, EPA, CPSC, OSHA, and DOT. DOT has essentially implemented the necessary changes to align with the GHS, and OSHA has published the final GHS rule. However, EPA and CPSC are not making progress in implementing the GHS. Although CPSC recently finalized a revised definition of strong sensitizer, 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.