

APEC CD GHS Implementation Convergence Questionnaire 2020

Progress Report

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Background

Since the 7th CD meeting in Peru in 2008 where the report of the Virtual Working Group on GHS (VWGGHS), “*Developing Clarity and Consistency in the Implementation of the Globally Harmonised System for the Classification and Labelling of Chemicals (GHS)*” was endorsed, the participating APEC Economies provided GHS implementation Reports detailing the progress of GHS implementation in their respective Economies on an annual or biennial basis.

Over the past decade, these reports identified that foreshadowed trade benefits from GHS implementation were not fully realized due to divergent implementation of GHS across the regions. The divergences in GHS implementation include:

- Adoption of different revisions of GHS,
- Adoption of different building blocks,
- Adoption of different classification cut-offs for building blocks, and
- Imposition of specific local requirements.

At the 21st Chemical Dialogue (CD) meeting in Papua New Guinea in 2018, the CD agreed to a new reporting mechanism on GHS implementation, focused on identifying strategies to improve GHS convergence by Member Economies, noting that the GHS Implementation Report template developed in 2008 was not intended to tease out the reasons behind the divergence, and therefore not an ideal tool for the task. The CD also supported trialing the new reporting form, the GHS Implementation Convergence Questionnaire (the Questionnaire), out of session, with a view to providing a new report to the Ministers Responsible for Trade (MRT) in 2019 (APEC CD 21 Agenda Item 3.c.ii).

The final report on GHS implementation convergence was tabled at the APEC Ministers Responsible for Trade (MRT) meeting in May 2019.¹ The report summarized steps taken by the CD to date, then identified a series of recommended steps that economies could implement to promote convergence:

- Adopt the 7th revision of the GHS by 2021;
- Implement automatic or legislated review processes to continually update to newer revisions of the GHS;
- Allow flexibility for classification where sub-categorization options exist in GHS building blocks; and
- Convene workshops within the CD Regulators’ Forum where detailed risk assessment and risk management specific to individual hazard categories and concentration cut-offs can be considered.

At the CD23 meeting in Puerto Varas, Chile, the Questionnaire for 2020 was tabled. The CD agreed to the timeline of action for the GHS implementation convergence report for MRT in 2020 and encouraged its Members to complete the questionnaire.

Introduction

The Questionnaire is focused on identifying any information that may assist in convergent implementation of GHS across the region.

¹ See 2019/MRT/006.

The Questionnaire is structured in five sections and aims to reflect the recommendations in the 20th APEC CD report endorsed by Ministers regarding addressing GHS implementation divergence². The five sections are:

1. Respondent details
2. General Information
3. Economies adopt later editions of GHS
4. Economies adopt common building blocks to facilitate trade
5. Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

It is noted that no questions in relation to the second dot point of the 20th APEC CD report recommendations (see footnote 1) were included in the Questionnaire as the issue is already clearly identified and actionable by individual Economies.

It must also be noted that this questionnaire does not address the whole of the GHS classification system *per se*. It is intended to tease out some of the key drivers behind implementation or non-implementation of specific building blocks, classification cut-off concentrations and sub-categories. The hypothesis is that the same or similar considerations would apply across most classification end points.

The questions were intended to allow contemplation of some potential impacts for Economies if they were to move to a more convergent implementation of GHS. As such, questions regarding flow-on risk management arising from GHS classification were included.

For example, in the 2019 Questionnaire, the divergent approaches to implementing the sensitization hazard classes was explored. This exercise was aimed at identifying key issues for divergences in the implementation of the GHS sensitization classes, with the goal of identifying potential solutions. The exercise was useful, with potential solutions and future work required for convergence identified as detailed in the Introduction section of this report.

In the 2020 Questionnaire, on which this report is based, the focus was on GHS Building Blocks where there were greatest variability across the APEC Economy wide GHS adoption i.e.:

- lower hazard categories or building blocks e.g. Flammable Liquid Category 4, Acute Toxicity Category 5, Aspiration Hazard Category 2, etc., and
- where the classification categories have been amended significantly in the later revisions of the GHS e.g. Flammable gases and Aerosols.

A copy of the 2020 Questionnaire is provided as Attachment 1 as a reference.

All responses to the Questionnaire are attached to this report as Attachment 2. The contact details of the respondents have been redacted as foreshadowed.

² ³ *To address divergences in GHS, the CD recommends that:*

- *APEC CD regulators work with each other to find possible ways to deliver a convergent implementation of GHS over time.*
- *Each APEC CD economy considers and amends elements of its own local rules for GHS implementation that may impede convergent implementation of GHS within the APEC region.*
- *Economies adopt common building blocks to facilitate trade.*
- *Economies adopt later editions of GHS.*

Response summary

Respondent details

Total responses received: 11

Total number of responding APEC Economies: 10

Respondent economies:

- Australia,
- Indonesia,
- Japan,
- Malaysia,
- Mexico,
- Peru,
- The Republic of the Philippines,
- The Russian Federation,
- Singapore, and
- Chinese Taipei.

Responses from regulators: 4

Responses received from industry: 5

Other: 3³

Table 1: Responses over time

Economies	2019	2020
Australia	✓	✓
Brunei Darussalam		
Canada	✓	
Chile		
The People's Republic of China		
Hong Kong, China		
Indonesia		✓
Japan		✓
The Republic of Korea		
Malaysia	✓	✓
Mexico	✓	✓
New Zealand		
Papua New Guinea		
Peru		✓
The Republic of the Philippines	✓	✓
The Russian Federation	✓	✓
Singapore	✓	✓
Chinese Taipei	✓	✓
Thailand	✓	
The United States of America	✓	
Viet Nam	✓	

³ Malaysia provided a joint regulator and industry response and is counted as both regulator response and industry response for the purposes of this report rather than 'other'.

General Information

Of the 10 responding economies, one economy noted that GHS is not currently in force in their economy. GHS is in force in 13 of the 14 economies that have provided responses to the Questionnaire in 2019 and 2020. All responding economies have plans to adopt later revisions of GHS or implement GHS.

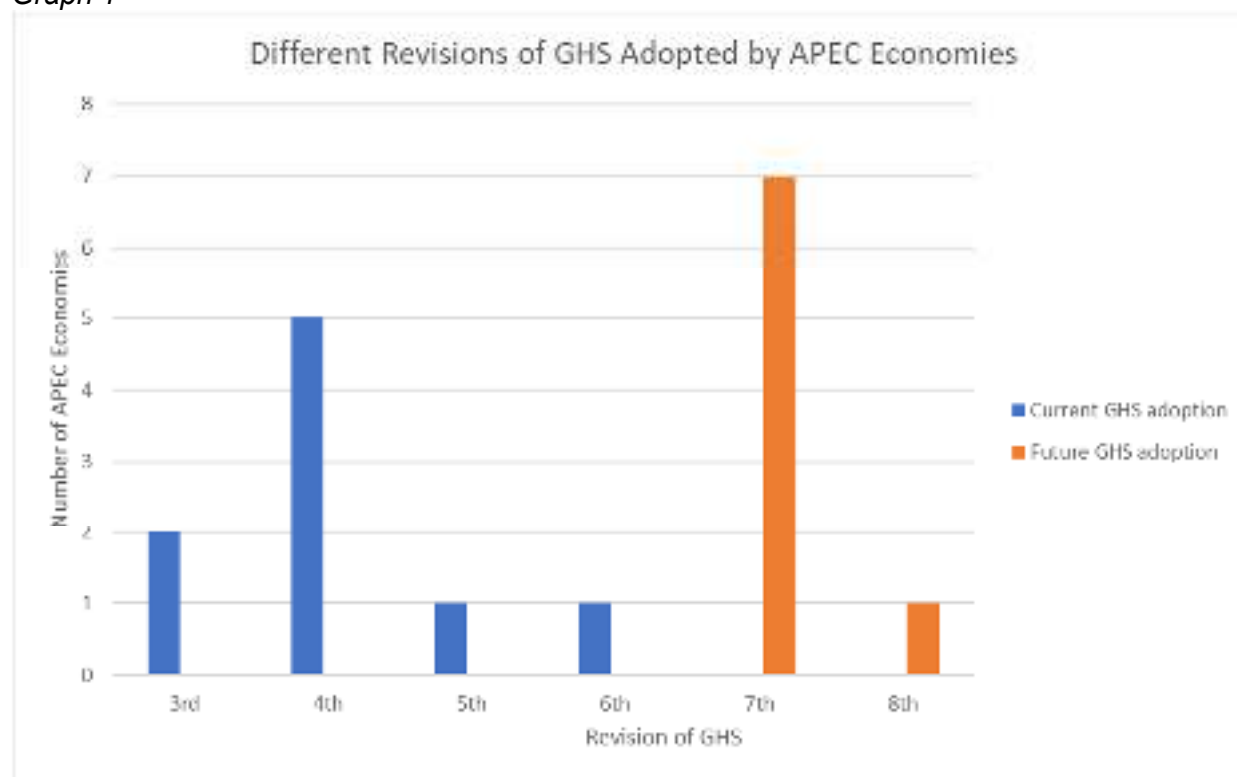
Based on the information received via the Questionnaire in 2020, the 4th revision of GHS is the most common GHS revision adopted by the reporting Economies.

Four Economies (Mexico, Singapore, Chinese Taipei and the Republic of Philippines) responded that they accept later revisions of GHS than the implemented revision. Japan noted that it will only accept compliance with earlier revisions of GHS. The remainder of Economies either did not accept earlier or later revision of GHS or did not have clear mechanisms to allow acceptance of earlier or later revisions of GHS.

Economies adopt later editions of GHS

Seven Economies responded that they have plans to move to the 7th revision of GHS. Two Economies identified 2020 as the likely adoption year, four Economies identified 2021 and one Economy identified 2022 as the likely adoption year. One Economy, the Republic of Philippines noted its plans to move to the 8th revision of GHS by 2022. Japan noted that its regular GHS implementation review occurs once every five years: The 6th revision of GHS was implemented in 2019, with the next review planned in 2024.

Graph 1



While some Economies identified formal mechanisms to trigger the adoption of later revisions of GHS such as legislated 5 yearly reviews, other Economies appeared to have less formal mechanisms. Identified review mechanisms include established GHS focal points that can review the need for update and “manually” triggered review, usually by the regulator.

The review trigger mechanisms that were identified by the Economies are listed below:

- Legislated 5 yearly reviews,
- Established GHS task force of regulator, industry and training organisations to assess the need for the adoption of a new revision on an on-going basis,
- Review every two years (it is unclear whether this is a legislated or less formal administrative practice), and
- “manual” trigger by the regulator.

Some Economies also identified that a full law making/update process would need to be followed to update to the newer revision of GHS, including cost/benefit analysis, regulation impact analysis and public consultations.

Economies adopt common building blocks to facilitate trade

At the 2017 SOM3 Chemical Dialogue meeting in Ho Chi Minh City, the VWG-GHS shared a document comparing the implementation of GHS amongst APEC Economies, *Comparison of Implementing Globally Harmonised System of Classification and Labelling Regulations Amongst the APEC Economies* (agenda item 2017/SOM3/CD/012) for review and discussion.

The comparison document highlighted the divergent implementation of GHS building blocks across the APEC region. While some of these divergences are likely to be due to the differences that exist in the legislative/regulatory structure of each economy and/or careful regulation impact consideration e.g. decision by Australia, Canada and the USA not to adopt environmental building blocks, some divergences may be due to the lack of availability of information on GHS implementation by close trading partners during the Economy’s implementation consideration.

In 2019, as an initial study to explore potential convergence of regulatory approach for GHS implementation, the differences in the implementation of two hazard classes, skin sensitisation and respiratory sensitisation across the APEC region was explored. The conclusion from that study, drawn from the responses provided, are:

- Allowing flexibility of adoption where either a single category or sub-categorisation may be used, appeared to deliver the greatest benefits compared to restricting to either only a single category or only sub-categories, and
- The implementation of the mixture calculation cut-off concentration appears to be based on risk management consideration for which the GHS does not provide guidance as it is a hazard-based system. Achieving convergent GHS implementation would therefore require some discussion outside GHS itself, specifically how GHS classification feeds into risk management considerations and how the risk management controls are derived.

The 2020 survey focus was on GHS Building Blocks where there was greatest variability across the APEC Economy wide GHS adoption i.e.:

- lower hazard categories or building blocks e.g. Flammable Liquid category 4, Acute Toxicity category 5, Aspiration Hazard category 2, Skin Irritation category 3 and Eye Irritation category 2; and
- where the classification categories have been amended significantly in the later revisions of the GHS e.g. Flammable Gases and Aerosols categories.

It is noted that two of the 10 responding Economies were undecided as to the adoption options for any of the GHS building blocks. The analysis provided below for the building block adoptions are therefore based on the responses of eight Economies.

Flammable gases and aerosols

The Flammable Gases and Aerosols categories were included in the Questionnaire based on the different adoptions of these categories across the APEC region and the fairly significant change in these categories across the GHS revisions. The question was whether the implementation of later revisions of GHS would lead to greater convergence.

All eight responding Economies identified that they plan to adopt all Aerosols categories, however only six identified that they will adopt all Flammable Gases categories. Australia, one of the two Economies not planning to adopt all Flammable Gases categories provided an explanation that Flammable Gases category 2 will not be adopted for consistency with Dangerous Goods Division 2.1 classification.

Flammable Liquid Category 4

Five responding Economies noted that they have adopted the Flammable Liquid Category 4. Additionally, Singapore responded that it adopts the GHS physical hazard classes and categories except for Flammable Liquids Category 4. The only chemical that is required to be classified under this category is diesel.

The Questionnaire requested additional information from Economies that have adopted Flammable Liquid Category 4 – what are the practical implications of the adoption of this category other than GHS hazard communication? The only response received, from Australia, noted that there are risk management controls on chemicals classified as Flammable Liquid Category 4, such as storage, signage and handling.

Eye Irritation Category 2

Three Economies responded that they adopt Eye Irritation category 2 as a single category with no sub categorization and three Economies responded that they adopt the category as two subcategories 2A and 2B. Chinese Taipei noted that they allow classification as a single category 2 with no sub-categorisation where data is not available for sub-categorisation. Australia noted that with the implementation of the 7th revision of GHS expected in 2020, the policy intent to adopt this building block flexibly, as either single category or as two sub-categories will be made clearer, noting that there is some confusion with the current implementation.

Lower Health Hazards (Acute Toxicity category 5; Skin Irritation Category 3; Aspiration Hazard Category 2)

Three Economies, Mexico, the Russian Federation and Chinese Taipei have responded that they have implemented the lower health hazard categories, Acute Toxicity category 5, Skin Irritation category 3 and Aspiration Hazard category 2. It is interesting to note that the Economies are either adopting all lower health hazard categories or none of them.

None of the three responding Economies that have adopted the lower health hazard categories responded to the additional question regarding practical implication of the adoption of these categories e.g. any specific product registration or storage and/or handling requirements.

Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Economies were asked to identify any forum for regulators that are dedicated to GHS implementation convergence or where GHS implementation could be discussed, in addition to those that were identified in 2019⁴. The following were identified:

- Intergovernmental Network on Chemicals and Waste for Latin America and the Caribbean, and
- Latin American Meeting on Chemicals Management.

The responses provided to the question regarding resources/support required to encourage convergence of GHS legislation/regulations within APEC are paraphrased, grouped and summarized below.

- Active participation and involvement:
 - Support and active participation from Governments,
 - Buy-in from all relevant regulatory sectors e.g. industrial chemical, consumer, agricultural chemicals, and
 - Engagement from technical and regulatory experts.
- Appropriate resourcing:
 - Resources to allow active participation,
 - Resources to participate in GHS convergence discussions,
 - Budget for workshops, and
 - GHS expert for capacity building including training the trainer on the latest revision of UN Purple Book to boost the GHS implementation.
- Benchmarking and analysis:
 - Analysis of reasons for the divergent implementation of GHS (potential expansion of the Questionnaire to live discussions), and
 - Bench marking on GHS best practices.
- Information sharing, training and mentoring:
 - Sharing of learnings on implementation and transition,
 - Information sharing on how GHS is implemented/new revisions are adopted, including how Regulation Impact Assessment is conducted,
 - Fostering common understanding of benefits of convergence,
 - Support for mentoring systems for SMEs, and
 - Consideration of risk and GHS;
 - Develop capacities on risk evaluation and share lessons learned regarding chemical management, and
 - Deeper understanding of how the GHS related regulations/legislations in the implementing Economies are utilized e.g. does it feed into risk management process beyond hazard communication?
- Development of flexible rules:
 - Discussion of mutual acceptance of mixture calculation cut-off concentrations, and

⁴ In 2019 the following fora were identified.

- APEC Chemical Dialogue
- UN GHS Sub-Committee (UNSCEGHS)
- United Nations Institute for Training and Research
- USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards)
- ASEAN Chemical Industry Regulatory Co-operation Workshop platform
- ASEAN OSHNet

- Continued acceptance of industry self-classification.

Conclusion

Based on the responses to the Questionnaire, the APEC Economies are working towards some aspects of convergent implementation of GHS. However, collaboration across the APEC region is essential to achieve better alignment.

The respondents to the Questionnaire have identified the need for a concerted effort at convergent implementation of GHS and contributed ideas for the way forward.

Economies adopt later revisions of GHS

All except two Economies that are planning to adopt a later revision of GHS have identified the 7th revision as the revision to adopt. One Economy has foreshadowed plans to adopt the 8th revision of GHS by 2022, while another has identified 2024 as the next review date with no specific GHS revision number identified.

In the last report, it was noted that the APEC Economies appeared to be converging on the adoption of the 7th revision of GHS between 2020-2022. It was also noted that given the differences in the review mechanisms across the Economies, the potential near future alignment of GHS 7th revision adoption is by good fortune rather than good design.

The responses this year supports the theory that the convergence on the 7th revision of GHS was indeed by fortune rather than by design. It is unlikely that we will see the same revision of GHS adopted across the APEC region at the same time without stronger commitment and a plan forward.

Economies adopt common building blocks to facilitate trade

It is noted that the conclusions drawn regarding convergent adoption of GHS classification building blocks is solely based on the responses to the Questionnaire, which in turn only considered a small number of building blocks where there was significant divergence.

With a very limited number of detailed responses on the reasons behind implementation of GHS building blocks it is difficult to analyse the reasons behind the divergence. Some of the discussions below are therefore hypotheses based on the information provided rather than analysis.

Physico-chemical hazards such as flammable gases and aerosols classification may be influenced by other global regulatory classifications such as dangerous goods classification. Two Economies did not adopt Flammable Gas category 2 classification and one of those economies specifically cited alignment with dangerous goods classification as the reason for the non-adoption.

Flammable Liquid category 4 elicited the most detailed response from participants. It is evident that the Flammable Liquid category 4 classification is used in risk management in at least some economies e.g. Australia for storage and signage requirements, in Singapore for diesel for requirements such as licensing.

Responding Economies were split in their approach in the adoption of Eye Irritation category 2 classification. Almost equal numbers implemented the category as a single category, as two sub-categories, or with the option to use sub-categories or a single category. This may suggest that there is no one method that is better than the other – more dialogue amongst regulators around

these options may encourage convergence in the approach of adopting those building blocks with sub-categories.

It is also interesting to note that the Economies have either opted to adopt all three lower hazard categories or none. None of the Economies that have implemented these building blocks have provided details on how these are used for risk management. Consensus on implementation convergence for these building blocks may be easier to reach than some other building blocks where there are clear risk management implications.

Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

From the list provided by survey respondents over the past two years, it is apparent that there are several fora where GHS implementation can be and is discussed. What is unclear is the nature and depth of the discussion and whether there are any overlaps.

It may be useful to take stock of work that is already occurring on GHS implementation, leverage work that is already done or in progress, and identify areas of further work that may be useful in achieving the two stated aims of implementing GHS – increased worker protection and ease of trade across borders.

Recommendations

The CD recommends that:

- Economies consider whether aligning GHS revision implementation timeframes is important to achieve convergence,
- Economies consider how GHS impacts on risk management controls in each economy and consider whether some lower hazard building blocks are necessary for best practice risk management,
- Economies consider allowing flexibility for classification for building blocks where sub-categorisation options exist in GHS, and
- Economies consider the best use of resources by taking stock of work already occurring in other fora and identify areas of further work that may be useful in quantifiably achieving the two stated aims of implementing GHS – increased worker protection and ease of trade across borders.

Attachment 1

Respondent Details

Please note that for the public report, the name, phone number and the email address of the respondent will be redacted. The name of the Organisation/Agency will be published for transparency.

1. Economy

2. Responding as:

Regulator

Industry

Other (please specify)

3. Name of Organisation/Agency

4. Name of Respondent

5. Phone number of the Respondent (for any follow up questions or clarifications)

6. Email address of the Respondent (for any follow up questions or clarifications)

7. Have you provided a response to previous years' GHS Convergence Questionnaire?

Yes

No

8. Has there been any changes in the GHS implementation in your Economy, including any new plans for changes, since you last completed the GHS Convergence Questionnaire?

Yes

No (please skip to page 8)

General Information

9. Has your Economy adopted the GHS?

Yes

No

General Information

10. Which revision of GHS is currently in force in your economy?

- | | |
|--|---|
| <input type="radio"/> Draft version | <input type="radio"/> 4th Revision (2011) |
| <input type="radio"/> 1st Edition (2003) | <input type="radio"/> 5th Revision (2013) |
| <input type="radio"/> 1st Revision (2005) | <input type="radio"/> 6th Revision (2015) |
| <input type="radio"/> 2nd Revision (2007) | <input type="radio"/> 7th Revision (2017) |
| <input type="radio"/> 3rd Revision (2009) | <input type="radio"/> 8th Revision (2019) |
| <input type="radio"/> Other (please specify) | |

11. Does your Economy accept classification, Hazard and Precautionary statements based on a revision of GHS that is not currently in force in your economy (i.e. either earlier revisions or later revisions)?

- No
- Later revisions only
- Earlier revisions only
- Other (please specify)

Economies adopt later editions of GHS

12. Does your economy have a mechanism to facilitate adoption of newer revisions of GHS as they are published by the UN e.g. legislated review process, sunset clause, etc.?

Yes

Unsure

No

13. Please provide details

Economies adopt later editions of GHS

14. Is there a plan to adopt one or more later revision of GHS within the next five years?

Yes

No

Unsure

Economies adopt later editions of GHS

15. Select the planned year/s for adoption

- 2019 2022
- 2020 2023
- 2021

16. Select the revision number/s planned for adoption

- 4th Revision 8th Revision (publication expected 2019)
- 5th Revision 9th Revision (publication expected 2021)
- 6th Revision 10th Revision (publication expected 2023)
- 7th Revision

17. Please detail the process that will be used for the amendment e.g. amendment to existing regulations to refer to the later revision of the GHS, consultation with stakeholders, final approval/legislative process and projected timeline for the process.

18. What are the impediments to adopting later revisions of the GHS?

Economies adopt common building blocks to facilitate trade

At the 2017 SOM3 Chemical Dialogue meeting in Ho Chi Minh City, the Virtual Working Group on GHS shared a document comparing the implementation of GHS amongst APEC Economies titled **Comparison of Implementing Globally Harmonised System of Classification and Labelling Regulations Amongst the APEC Economies (agenda item 2017/SOM3/CD/012)** for review and discussion.

The comparison document highlighted the divergent implementation of GHS building blocks across the APEC region.

The results from the 2019 Questionnaire, an initial study exploring potential convergent approaches using the sensitisation hazard classes, suggests that a flexible approach to GHS implementation where possible, achieves a more convergent implementation. Where health and safety concerns are raised, further risk assessment and management discussion and consideration may be required to build consensus to convergence.

For this 2020 GHS Convergence Questionnaire, we will explore the lower hazard categories that are implemented by some Economies but not others to examine further opportunities and road blocks to a more convergent implementation of GHS across the APEC region.

Some of the divergences in the choice of building blocks appear specific to the revision adopted by the Economies i.e. Flammable Gas and Aerosol classes. The questions relating to these classes will aim to confirm this assumption and draw out whether adoption of later revisions will lead to convergence.

Where the divergences in the building block adoption are unrelated to the revision adopted, specific rationale for adoption/non-adoption will be sought.

19. Has your Economy implemented all Categories (including sub-categories as relevant) for **Flammable gas (Chapter 2.2)** and **Aerosol (Chapter 2.3)** classes within the GHS Revision implemented in your Economy?

- Yes - For both Flammable Gas and Aerosol classes
- Yes - only for Flammable Gas
- Yes - only for Aerosol
- No

If your Economy has not adopted all GHS categories for Flammable Gas and Aerosol classes for the revision of GHS that is current in your Economy, please provide a short reason.

20. If your Economy plans to move to a later revision of GHS, is there are plan to to adopt all Categories (including sub-categories) of Flammable Gas and Aerosol classes?

- Yes - for both Flammable Gas and Aerosol classes
- Yes - only for Flammable Gas
- Yes - only for Aerosol
- No

If your Economy does not plan to adopt all GHS categories for Flammable Gas and Aerosol classes for future GHS revision updates, please provide a short reason.

21. Has your Economy adopted Flammable Liquid Category 4 building block?

- Yes
- No

If yes, please detail the practical implications of the adoption other than GHS hazard communication e.g. local laws relating to fire fighting, emergency response or building standards linked to the Flammable Liquid Category 4 classification.

22. Has you Economy adopted Acute Toxicity Category 5 building block?

- Yes
- No

If yes, please detail practical implications of the adoption other than GHS hazard communication e.g. triggers product registration requirement or specific storage and/or handling requirements.

23. Has you Economy adopted Skin Irritation Category 3 building block?

- Yes
- No

If yes, please detail practical implications of the adoption other than GHS hazard communication e.g. triggers product registration requirement or specific storage and/or handling requirements.

24. Has your Economy adopted Aspiration Hazard Category 2 building block?

- Yes
- No

If yes, please detail practical implications of the adoption other than GHS hazard communication e.g. triggers product registration requirement or specific storage and/or handling requirements.

25. Has your Economy adopted Eye Irritation category 2:

- As a single category with no sub-categorisation
- As two sub-categories, 2A and 2B
- Only sub-category 2A

If your Economy has NOT adopted sub-category 2B, please detail the practical implications of the non-adoption INCLUDING GHS hazard communication e.g. substances classified as eye irritant category 2B do not required GHS hazard label or SDS.

Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

26. Are you aware of any existing forum for regulators where regulatory convergence can be discussed, **other than** those identified in the 2019 APEC CD GHS Convergence report i.e.:

- APEC Chemical Dialogue
- UN GHS Sub-Committee (UNSCEGHS)
- United Nations Institute for Training and Research
- USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards)
- ASEAN Chemical Industry Regulatory Co-operation Workshop platform
- ASEAN OSHNet

Yes

No

Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

27. Are there any current fora solely for the discussion on the convergent implementation of GHS?

Yes

No

Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

28. Please list all newly identified fora where GHS implementation convergence is or could be discussed and facilitated.

Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

29. What resources/support is required to encourage convergence of GHS legislation/regulations within APEC?

Thank you for completing the survey

30. Thank you for completing this survey. Do you have any other comments to add?

Attachment 2

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, September 13, 2019 6:38:26 PM
Last Modified: Friday, September 13, 2019 7:14:05 PM
Time Spent: 00:35:39
IP Address: 202.47.80.76

Page 1: Respondent Details

Q1 Economy **Inodnesia**

Q2 Responding as: **Regulator**

Q3 Name of Organisation/Agency

Ministry of Industry

Q4 Name of Respondent

[REDACTED]

Q5 Phone number of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q6 Email address of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q7 Have you provided a response to previous years' GHS Convergence Questionnaire? **Yes**

Q8 Has there been any changes in the GHS implementation in your Economy, including any new plans for changes, since you last completed the GHS Convergence Questionnaire? **Yes**

Page 2: General Information

Q9 Has your Economy adopted the GHS? **Yes**

Page 3: General Information

Q10 Which revision of GHS is currently in force in your economy? **4th Revision (2011)**

Q11 Does your Economy accept classification, Hazard and Precautionary statements based on a revision of GHS that is not currently in force in your economy (i.e. either earlier revisions or later revisions)? Other (please specify):
it is not clearly specified in the regulation

Page 4: Economies adopt later editions of GHS

Q12 Does your economy have a mechanism to facilitate adoption of newer revisions of GHS as they are published by the UN e.g. legislated review process, sunset clause, etc.? **Yes**

Q13 Please provide details

It is stated in GHS Regulation No 23/2013 Article 2 item 3

Page 5: Economies adopt later editions of GHS

Q14 Is there a plan to adopt one or more later revision of GHS within the next five years? **Yes**

Page 6: Economies adopt later editions of GHS

Q15 Select the planned year/s for adoption **2021**

Q16 Select the revision number/s planned for adoption **7th Revision**

Q17 Please detail the process that will be used for the amendment e.g. amendment to existing regulations to refer to the later revision of the GHS, consultation with stakeholders, final approval/legislative process and projected timeline for the process.

Recently, MOI is drafting Indonesia National Standard (SNI) for GHS. The SNI will be adopting GHS 7th edition. Timeline: finalization of the SNI draft and GHS regulation revision in 2020. Implementation of the GHS regulation in 2021.

Page 7: Economies adopt later editions of GHS

Q18 What are the impediments to adopting later revisions of the GHS?

GHS implementation for the SMEs

Page 8: Economies adopt common building blocks to facilitate trade

Q19 Has your Economy implemented all Categories (including sub-categories as relevant) for Flammable gas (Chapter 2.2) and Aerosol (Chapter 2.3) classes within the GHS Revision implemented in your Economy?

No,
If your Economy has not adopted all GHS categories for Flammable Gas and Aerosol classes for the revision of GHS that is current in your Economy, please provide a short reason.:
Flammable Gas: Sub Category 1A/1B are not adopted;
Aerosol: Category 3 is not adopted.

Q20 If your Economy plans to move to a later revision of GHS, is there are plan to to adopt all Categories (including sub-categories) of Flammable Gas and Aerosol classes?

Yes - for both Flammable Gas and Aerosol classes

Q21 Has your Economy adopted Flammable Liquid Category 4 building block?

No

Q22 Has you Economy adopted Acute Toxicity Category 5 building block?

No

Q23 Has you Economy adopted Skin Irritation Category 3 building block?

No

Q24 Has you Economy adopted Aspiration Hazard Category 2 building block?

No

Q25 Has you Economy adopted Eye Irritation category 2:

As two sub-categories, 2A and 2B

Page 9: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q26 Are you aware of any existing forum for regulators where regulatory convergence can be discussed, other than those identified in the 2019 APEC CD GHS Convergence report i.e.:
APEC Chemical Dialogue
UN GHS Sub-Committee (UNSCEGHS)
United Nations Institute for Training and Research
USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards)
ASEAN Chemical Industry Regulatory Co-operation Workshop platform
ASEAN OSHNet

No

Page 10: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q27 Are there any current fora solely for the discussion on the convergent implementation of GHS?

Respondent skipped this question

Page 11: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q28 Please list all newly identified fora where GHS implementation convergence is or could be discussed and facilitated.

Respondent skipped this question

Page 12: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q29 What resources/support is required to encourage convergence of GHS legislation/regulations within APEC?

GHS expert for capacity building including Training for the Trainers on the latest revision of UN Purple Book to boost the GHS implementation in Indonesia. Support for mentoring system for the SMEs.

Page 13: Thank you for completing the survey

Q30 Thank you for completing this survey. Do you have any other comments to add?

Need support for exchange expertise and bench marking on the GHS best practices.

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, November 26, 2019 4:28:42 AM
Last Modified: Tuesday, November 26, 2019 4:50:30 AM
Time Spent: 00:21:47
IP Address: 148.244.211.253

Page 1: Respondent Details

Q1 Economy Mexico

Q2 Responding as: Industry

Q3 Name of Organisation/Agency

ASOCIACIÓN NACIONAL DE LA INDUSTRIA QUÍMICA, A.C.

Q4 Name of Respondent

[REDACTED]

Q5 Phone number of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q6 Email address of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q7 Have you provided a response to previous years' GHS Convergence Questionnaire? Yes

Q8 Has there been any changes in the GHS implementation in your Economy, including any new plans for changes, since you last completed the GHS Convergence Questionnaire? No (skip questions relating to timing of GHS implementation and revision being adopted)

Page 2: General Information

Q9 Has your Economy adopted the GHS? Respondent skipped this question

Page 3: General Information

Q10 Which revision of GHS is currently in force in your economy? **Respondent skipped this question**

Q11 Does your Economy accept classification, Hazard and Precautionary statements based on a revision of GHS that is not currently in force in your economy (i.e. either earlier revisions or later revisions)? **Respondent skipped this question**

Page 4: Economies adopt later editions of GHS

Q12 Does your economy have a mechanism to facilitate adoption of newer revisions of GHS as they are published by the UN e.g. legislated review process, sunset clause, etc.? **Respondent skipped this question**

Q13 Please provide details **Respondent skipped this question**

Page 5: Economies adopt later editions of GHS

Q14 Is there a plan to adopt one or more later revision of GHS within the next five years? **Respondent skipped this question**

Page 6: Economies adopt later editions of GHS

Q15 Select the planned year/s for adoption **Respondent skipped this question**

Q16 Select the revision number/s planned for adoption **Respondent skipped this question**

Q17 Please detail the process that will be used for the amendment e.g. amendment to existing regulations to refer to the later revision of the GHS, consultation with stakeholders, final approval/legislative process and projected timeline for the process. **Respondent skipped this question**

Page 7: Economies adopt later editions of GHS

Q18 What are the impediments to adopting later revisions of the GHS? **Respondent skipped this question**

Page 8: Economies adopt common building blocks to facilitate trade

Q19 Has your Economy implemented all Categories (including sub-categories as relevant) for Flammable gas (Chapter 2.2) and Aerosol (Chapter 2.3) classes within the GHS Revision implemented in your Economy?

Yes - only for Flammable Gas,

If your Economy has not adopted all GHS categories for Flammable Gas and Aerosol classes for the revision of GHS that is current in your Economy, please provide a short reason.:

Aerosol class did not exist when the regulation was emitted.

Q20 If your Economy plans to move to a later revision of GHS, is there are plan to to adopt all Categories (including sub-categories) of Flammable Gas and Aerosol classes?

Yes - only for Aerosol

Q21 Has your Economy adopted Flammable Liquid Category 4 building block?

Yes

Q22 Has you Economy adopted Acute Toxicity Category 5 building block?

Yes

Q23 Has you Economy adopted Skin Irritation Category 3 building block?

Yes

Q24 Has you Economy adopted Aspiration Hazard Category 2 building block?

Yes

Q25 Has you Economy adopted Eye Irritation category 2:

As a single category with no sub-categorisation

Page 9: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q26 Are you aware of any existing forum for regulators where regulatory convergence can be discussed, other than those identified in the 2019 APEC CD GHS Convergence report i.e.:
 APEC Chemical Dialogue
 UN GHS Sub-Committee (UNSCEGHS)
 United Nations Institute for Training and Research
 USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards)
 ASEAN Chemical Industry Regulatory Co-operation Workshop platform
 ASEAN OSHNet

No

Page 10: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q27 Are there any current fora solely for the discussion on the convergent implementation of GHS?

Respondent skipped this question

Page 11: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q28 Please list all newly identified fora where GHS implementation convergence is or could be discussed and facilitated.

Respondent skipped this question

Page 12: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q29 What resources/support is required to encourage convergence of GHS legislation/regulations within APEC?

Share data base, studies and clasifications list between countries.

Page 13: Thank you for completing the survey

Q30 Thank you for completing this survey. Do you have any other comments to add?

Respondent skipped this question

#3

INCOMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, December 03, 2019 11:12:15 AM
Last Modified: Friday, December 06, 2019 7:38:42 PM
Time Spent: Over a day
IP Address: 202.90.138.170

Page 1: Respondent Details

Q1 Economy

The Republic of the Philippines

Q2 Responding as:

Regulator

Q3 Name of Organisation/Agency

OCCUPATIONAL SAFETY AND HEALTH CENTER (Department of Labor and Employment)

Q4 Name of Respondent

[REDACTED]

Q5 Phone number of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q6 Email address of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q7 Have you provided a response to previous years' GHS Convergence Questionnaire?

No

Q8 Has there been any changes in the GHS implementation in your Economy, including any new plans for changes, since you last completed the GHS Convergence Questionnaire?

No (skip questions relating to timing of GHS implementation and revision being adopted)

Page 2: General Information

Q9 Has your Economy adopted the GHS?

Yes

Page 3: General Information

Q10 Which revision of GHS is currently in force in your economy?

Other (please specify):

DOLE Department Order (DO) 136 series 2014 used the 2011 (4th Revision) but Section 5 of the DO on Adherence to the latest edition of the GHS states that the establishment shall always adopt the latest edition of the GHS

Q11 Does your Economy accept classification, Hazard and Precautionary statements based on a revision of GHS that is not currently in force in your economy (i.e. either earlier revisions or later revisions)?

Later revisions only

Page 4: Economies adopt later editions of GHS

Q12 Does your economy have a mechanism to facilitate adoption of newer revisions of GHS as they are published by the UN e.g. legislated review process, sunset clause, etc.?

Yes

Q13 Please provide details

The Occupational Safety and Health Center being a training institution on OSH provides information on the latest revision on GHS in our Chemical Safety Trainings for chemical manufacturers, handlers and users. These information must be adopted by the establishment based on Section 5 of DOLE DO 136-14

Page 5: Economies adopt later editions of GHS

Q14 Is there a plan to adopt one or more later revision of GHS within the next five years?

Yes

Page 6: Economies adopt later editions of GHS

Q15 Select the planned year/s for adoption

2022

Q16 Select the revision number/s planned for adoption

8th Revision (publication expected 2019)

Q17 Please detail the process that will be used for the amendment e.g. amendment to existing regulations to refer to the later revision of the GHS, consultation with stakeholders, final approval/legislative process and projected timeline for the process.

Review of the existing Department Order , consultation with industries and stakeholders, propose amendment of the DO, presentation to Tripartite Executive Committee (TEC), final approval of the Secretary of Labor and issuance of the amendment (2020 to 2022)

Page 7: Economies adopt later editions of GHS

Q18 What are the impediments to adopting later revisions of the GHS?

long legislative process, concerns of the chemical industries as to compliance and corresponding penalties on violations

Page 8: Economies adopt common building blocks to facilitate trade

Q19 Has your Economy implemented all Categories (including sub-categories as relevant) for Flammable gas (Chapter 2.2) and Aerosol (Chapter 2.3) classes within the GHS Revision implemented in your Economy?

No,

If your Economy has not adopted all GHS categories for Flammable Gas and Aerosol classes for the revision of GHS that is current in your Economy, please provide a short reason.:

The Technical Working Group (TWG) is presently reviewing and working on the building blocks

Q20 If your Economy plans to move to a later revision of GHS, is there are plan to to adopt all Categories (including sub-categories) of Flammable Gas and Aerosol classes?

Yes - for both Flammable Gas and Aerosol classes

Q21 Has your Economy adopted Flammable Liquid Category 4 building block?

No

Q22 Has you Economy adopted Acute Toxicity Category 5 building block?

No

Q23 Has you Economy adopted Skin Irritation Category 3 building block?

No

Q24 Has you Economy adopted Aspiration Hazard Category 2 building block?

No

Q25 Has you Economy adopted Eye Irritation category 2:

Respondent skipped this question

Page 9: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q26 Are you aware of any existing forum for regulators where regulatory convergence can be discussed, other than those identified in the 2019 APEC CD GHS Convergence report i.e.:
 APEC Chemical Dialogue
 UN GHS Sub-Committee (UNSCEGHS)
 United Nations Institute for Training and Research
 USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards)
 ASEAN Chemical Industry Regulatory Co-operation Workshop platform
 ASEAN OSHNet

Yes

Page 10: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q27 Are there any current fora solely for the discussion on the convergent implementation of GHS? **Yes**

Page 11: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q28 Please list all newly identified fora where GHS implementation convergence is or could be discussed and facilitated. **Respondent skipped this question**

Page 12: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q29 What resources/support is required to encourage convergence of GHS legislation/regulations within APEC? **Respondent skipped this question**

Page 13: Thank you for completing the survey

Q30 Thank you for completing this survey. Do you have any other comments to add? **Respondent skipped this question**

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, December 13, 2019 7:22:17 PM
Last Modified: Friday, December 13, 2019 9:06:59 PM
Time Spent: 01:44:42
IP Address: 121.121.43.121

Page 1: Respondent Details

Q1 Economy **Malaysia**

Q2 Responding as: Other (please specify):
Regulator & Industry

Q3 Name of Organisation/Agency

Department of Occupational Safety and Health (DOSH) & Chemical Industries Council of Malaysia (CICM)

Q4 Name of Respondent

[REDACTED]

Q5 Phone number of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q6 Email address of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q7 Have you provided a response to previous years' GHS Convergence Questionnaire? **Yes**

Q8 Has there been any changes in the GHS implementation in your Economy, including any new plans for changes, since you last completed the GHS Convergence Questionnaire? **Yes**

Page 2: General Information

Q9 Has your Economy adopted the GHS? **Yes**

Page 3: General Information

Q10 Which revision of GHS is currently in force in your economy? **3rd Revision (2009)**

Q11 Does your Economy accept classification, Hazard and Precautionary statements based on a revision of GHS that is not currently in force in your economy (i.e. either earlier revisions or later revisions)? **No**

Page 4: Economies adopt later editions of GHS

Q12 Does your economy have a mechanism to facilitate adoption of newer revisions of GHS as they are published by the UN e.g. legislated review process, sunset clause, etc.? **No**

Q13 Please provide details

We do not have an automatic or legislated mechanism to adopt a newer version, but it is manually triggered and has to go through usual legislative process to amend the regulation

Page 5: Economies adopt later editions of GHS

Q14 Is there a plan to adopt one or more later revision of GHS within the next five years? **Yes**

Page 6: Economies adopt later editions of GHS

Q15 Select the planned year/s for adoption **2022**

Q16 Select the revision number/s planned for adoption **7th Revision**

Q17 Please detail the process that will be used for the amendment e.g. amendment to existing regulations to refer to the later revision of the GHS, consultation with stakeholders, final approval/legislative process and projected timeline for the process.

DOSH:

1. Process involved regulations write up by an internal committee
2. Consultation will be made with stakeholders through public comment
3. Approval subjected to Attorney General and legal advisor at ministerial level

CICM:

Government is expected to revise existing regulation / industry code of practice to refer to the later editions of GHS

Page 7: Economies adopt later editions of GHS

Q18 What are the impediments to adopting later revisions of the GHS?

DOSH:

Since GHS is embedded into legislation, adoption of later revision of GHS will take time and not possible to be aligned simultaneously

CICM:

Awareness and understanding of the changes of the later GHS revisions, which may affect classifications of a chemical. Industry will need to review their classifications to ensure it is aligned with the adopted later revisions of GHS

Page 8: Economies adopt common building blocks to facilitate trade

Q19 Has your Economy implemented all Categories (including sub-categories as relevant) for Flammable gas (Chapter 2.2) and Aerosol (Chapter 2.3) classes within the GHS Revision implemented in your Economy? **No**

Q20 If your Economy plans to move to a later revision of GHS, is there are plan to to adopt all Categories (including sub-categories) of Flammable Gas and Aerosol classes? **No**

If your Economy does not plan to adopt all GHS categories for Flammable Gas and Aerosol classes for future GHS revision updates, please provide a short reason.:
Not yet decided

Q21 Has your Economy adopted Flammable Liquid Category 4 building block? **No**

Q22 Has you Economy adopted Acute Toxicity Category 5 building block? **No**

Q23 Has you Economy adopted Skin Irritation Category 3 building block? **No**

Q24 Has you Economy adopted Aspiration Hazard Category 2 building block? **No**

Q25 Has you Economy adopted Eye Irritation category 2: **As a single category with no sub-categorisation**

Page 9: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q26 Are you aware of any existing forum for regulators where regulatory convergence can be discussed, other than those identified in the 2019 APEC CD GHS Convergence report i.e.:
APEC Chemical Dialogue
UN GHS Sub-Committee (UNSCEGHS)
United Nations Institute for Training and Research
USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards)
ASEAN Chemical Industry Regulatory Co-operation Workshop platform
ASEAN OSHNet

Page 10: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q27 Are there any current fora solely for the discussion on the convergent implementation of GHS? **Yes**

Page 11: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q28 Please list all newly identified fora where GHS implementation convergence is or could be discussed and facilitated.

Not aware of any new fora / forum

Page 12: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q29 What resources/support is required to encourage convergence of GHS legislation/regulations within APEC?

DOSH:

1. Support and active participation of National Coordinating Committee (NCC) for coordinating 4 sectors (i.e. workplace, transport, agriculture and consumer) for GHS implementation
2. Budget for workshop
3. Support and expertise from industry and other stakeholders

CICM:

1. Strong support & commitment from the Government, i.e. Minister of Trade and regulating authorities
 2. Resources (time & budget) are available for participation in discussions for convergence of GHS legislation / regulations
 3. Support & expertise from industry and other stakeholders
-

Page 13: Thank you for completing the survey

Q30 Thank you for completing this survey. Do you have any other comments to add?

DOSH:

To ensure all programmes / activities under APEC Chemical Dialogue is being disseminated to all related agencies and stakeholders to ensure continuity and successful implementation in each country

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, December 16, 2019 10:33:57 AM
Last Modified: Monday, December 16, 2019 10:49:27 AM
Time Spent: 00:15:30
IP Address: 39.109.208.104

Page 1: Respondent Details

Q1 Economy Singapore

Q2 Responding as: Industry

Q3 Name of Organisation/Agency

Singapore Chemical Industry Council

Q4 Name of Respondent

[REDACTED]

Q5 Phone number of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q6 Email address of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q7 Have you provided a response to previous years' GHS Convergence Questionnaire? Yes

Q8 Has there been any changes in the GHS implementation in your Economy, including any new plans for changes, since you last completed the GHS Convergence Questionnaire? No (skip questions relating to timing of GHS implementation and revision being adopted)

Page 2: General Information

Q9 Has your Economy adopted the GHS? Respondent skipped this question

Page 3: General Information

Q10 Which revision of GHS is currently in force in your economy? **Respondent skipped this question**

Q11 Does your Economy accept classification, Hazard and Precautionary statements based on a revision of GHS that is not currently in force in your economy (i.e. either earlier revisions or later revisions)? **Respondent skipped this question**

Page 4: Economies adopt later editions of GHS

Q12 Does your economy have a mechanism to facilitate adoption of newer revisions of GHS as they are published by the UN e.g. legislated review process, sunset clause, etc.? **Respondent skipped this question**

Q13 Please provide details **Respondent skipped this question**

Page 5: Economies adopt later editions of GHS

Q14 Is there a plan to adopt one or more later revision of GHS within the next five years? **Respondent skipped this question**

Page 6: Economies adopt later editions of GHS

Q15 Select the planned year/s for adoption **Respondent skipped this question**

Q16 Select the revision number/s planned for adoption **Respondent skipped this question**

Q17 Please detail the process that will be used for the amendment e.g. amendment to existing regulations to refer to the later revision of the GHS, consultation with stakeholders, final approval/legislative process and projected timeline for the process. **Respondent skipped this question**

Page 7: Economies adopt later editions of GHS

Q18 What are the impediments to adopting later revisions of the GHS? **Respondent skipped this question**

Page 8: Economies adopt common building blocks to facilitate trade

Q19 Has your Economy implemented all Categories (including sub-categories as relevant) for Flammable gas (Chapter 2.2) and Aerosol (Chapter 2.3) classes within the GHS Revision implemented in your Economy?

No,
If your Economy has not adopted all GHS categories for Flammable Gas and Aerosol classes for the revision of GHS that is current in your Economy, please provide a short reason.:
Not yet, we are still referencing to GHS revision 4 at the moment.

Q20 If your Economy plans to move to a later revision of GHS, is there are plan to to adopt all Categories (including sub-categories) of Flammable Gas and Aerosol classes?

Yes - for both Flammable Gas and Aerosol classes,
If your Economy does not plan to adopt all GHS categories for Flammable Gas and Aerosol classes for future GHS revision updates, please provide a short reason.:
Yes. We are planning to adopt GHS revision 7 by 2021.

Q21 Has your Economy adopted Flammable Liquid Category 4 building block?

Yes,
If yes, please detail the practical implications of the adoption other than GHS hazard communication e.g. local laws relating to fire fighting, emergency response or building standards linked to the Flammable Liquid Category 4 classification.:
Yes but limited to Diesel. Singapore adopts the GHS physical hazard classes and categories except for Flammable liquids Category 4. The only chemical that is required to be classified under this category is diesel. Diesel is controlled under the Fire Safety (Petroleum & Flammable Material) Regulations by SCDF (Singapore Civil Defense Force) and required license to import, transport and store in Singapore.

Q22 Has you Economy adopted Acute Toxicity Category 5 building block?

No

Q23 Has you Economy adopted Skin Irritation Category 3 building block?

No

Q24 Has you Economy adopted Aspiration Hazard Category 2 building block?

No

Q25 Has you Economy adopted Eye Irritation category 2:

As a single category with no sub-categorisation,
If your Economy has NOT adopted sub-category 2B, please detail the practical implications of the non-adoption INCLUDING GHS hazard communication e.g. substances classified as eye irritant category 2B do not required GHS hazard label or SDS.:
Yes, For the following hazard classes, where data are not available, it is not necessary to further classify them into sub-categories: Serious eye damage/eye irritation - Sub-categories 2A and 2B are merged into Cat 2.

Page 9: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q26 Are you aware of any existing forum for regulators where regulatory convergence can be discussed, other than those identified in the 2019 APEC CD GHS Convergence report i.e.:
APEC Chemical Dialogue
UN GHS Sub-Committee (UNSCEGHS)
United Nations Institute for Training and Research
USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards)
ASEAN Chemical Industry Regulatory Co-operation Workshop platform
ASEAN OSHNet

Respondent skipped this question

Page 10: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q27 Are there any current fora solely for the discussion on the convergent implementation of GHS?

Respondent skipped this question

Page 11: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q28 Please list all newly identified fora where GHS implementation convergence is or could be discussed and facilitated.

Sharing by regulators on how GHS is implemented and adoption of new versions. Sharing on how regulator conduct the regulatory impact assessment and implement the change to regulation and standard.

Encouraging regulators to share the learning and challenges for countries who have not yet to implement GHS.

To share the benefits of GHS implementation in the country (engagement between industry and regulators)

Page 12: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q29 What resources/support is required to encourage convergence of GHS legislation/regulations within APEC?

Capacity Building to SMEs (Small and Medium Enterprises), compliance aid for the GHS implementation to SME, sharing of good industry practice between MNCs to SMEs and

sharing of learning between regulators to regulators on the implementation and transition.

Page 13: Thank you for completing the survey

Q30 Thank you for completing this survey. Do you have any other comments to add?

Respondent skipped this question

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, December 17, 2019 4:24:04 PM
Last Modified: Tuesday, December 17, 2019 5:03:14 PM
Time Spent: 00:39:10
IP Address: 165.12.252.111

Page 1: Respondent Details

Q1 Economy **Australia**

Q2 Responding as: Other (please specify):
National Policy Body for Work Health and Safety

Q3 Name of Organisation/Agency

Safe Work Australia

Q4 Name of Respondent

[REDACTED]

Q5 Phone number of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q6 Email address of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q7 Have you provided a response to previous years' GHS Convergence Questionnaire? **Yes**

Q8 Has there been any changes in the GHS implementation in your Economy, including any new plans for changes, since you last completed the GHS Convergence Questionnaire? **Yes**

Page 2: General Information

Q9 Has your Economy adopted the GHS? **Yes**

Page 3: General Information

Q10 Which revision of GHS is currently in force in your economy? **3rd Revision (2009)**

Q11 Does your Economy accept classification, Hazard and Precautionary statements based on a revision of GHS that is not currently in force in your economy (i.e. either earlier revisions or later revisions)?

Other (please specify):

Most Australian states and territories only accept classification, hazard and precautionary statements in accordance with the 3rd revised edition of the GHS. However, in Victoria a chemical may be labelled and its safety data sheet prepared in accordance with either the 3rd, 4th or 5th revised edition of the GHS.

Page 4: Economies adopt later editions of GHS

Q12 Does your economy have a mechanism to facilitate adoption of newer revisions of GHS as they are published by the UN e.g. legislated review process, sunset clause, etc.? **No**

Q13 Please provide details

To implement a newer version of the GHS in Australia, a decision must be made at the national level as to which revision will be adopted, the building blocks adopted and the timing of implementation.

Page 5: Economies adopt later editions of GHS

Q14 Is there a plan to adopt one or more later revision of GHS within the next five years? **Yes**

Page 6: Economies adopt later editions of GHS

Q15 Select the planned year/s for adoption **2020**

Q16 Select the revision number/s planned for adoption **7th Revision**

Q17 Please detail the process that will be used for the amendment e.g. amendment to existing regulations to refer to the later revision of the GHS, consultation with stakeholders, final approval/legislative process and projected timeline for the process.

Formal consultation with Australian stakeholders began in March 2019, with a series of face to face workshops. On 3 July 2019 a consultation paper was published to seek stakeholder views on the proposed adoption of the 7th Revision. Following consultation, agreement to implement the 7th Revision of the GHS was reached on 27 November 2019. An in-principle implementation date has been agreed for 1 July 2020, with a 2 year transitional period.

Page 7: Economies adopt later editions of GHS

Q18 What are the impediments to adopting later revisions of the GHS?

There are no significant impediment to implementing later revisions of the GHS. Normal regulation impact, consultation and legislative amendment processes. However it is important that the timing of adoption of later revisions must be co-ordinated with major trading partners.

Page 8: Economies adopt common building blocks to facilitate trade

Q19 Has your Economy implemented all Categories (including sub-categories as relevant) for Flammable gas (Chapter 2.2) and Aerosol (Chapter 2.3) classes within the GHS Revision implemented in your Economy?

Yes - only for Aerosol,

If your Economy has not adopted all GHS categories for Flammable Gas and Aerosol classes for the revision of GHS that is current in your Economy, please provide a short reason.:

Flammable Gas category 2 not adopted for consistency with Class 2.1 for transport.

Q20 If your Economy plans to move to a later revision of GHS, is there are plan to to adopt all Categories (including sub-categories) of Flammable Gas and Aerosol classes?

Yes - only for Aerosol,

If your Economy does not plan to adopt all GHS categories for Flammable Gas and Aerosol classes for future GHS revision updates, please provide a short reason.:

As above

Q21 Has your Economy adopted Flammable Liquid Category 4 building block?

Yes,

If yes, please detail the practical implications of the adoption other than GHS hazard communication e.g. local laws relating to fire fighting, emergency response or building standards linked to the Flammable Liquid Category 4 classification.:

Category 4 Flammable liquids are also referred to in Australia as C1 Combustible Liquids. The category was included in the GHS implementation to retain consistency with pre- GHS laws and standards, including those related to storage, and signage.

Q22 Has you Economy adopted Acute Toxicity Category 5 building block?

No

Q23 Has you Economy adopted Skin Irritation Category 3 building block?

No

Q24 Has you Economy adopted Aspiration Hazard Category 2 building block?

No

Q25 Has your Economy adopted Eye Irritation category 2:

As a single category with no sub-categorisation,
 If your Economy has NOT adopted sub-category 2B, please detail the practical implications of the non-adoption INCLUDING GHS hazard communication e.g. substances classified as eye irritant category 2B do not required GHS hazard label or SDS.:
 Regardless of whether category 2B is adopted or not ,all eye irritants meeting the criteria for Category 2 (reversible within 21 days) must be labelled and have SDS as the criteria in the GHS for category 2B are encompassed by those for Category 2A or Category 2/2A depending on which revision is adopted.

Page 9: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q26 Are you aware of any existing forum for regulators where regulatory convergence can be discussed, other than those identified in the 2019 APEC CD GHS Convergence report i.e.:
 APEC Chemical Dialogue · UN GHS Sub-Committee (UNSCEGHS) · United Nations Institute for Training and Research · USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards) · ASEAN Chemical Industry Regulatory Co-operation Workshop platform · ASEAN OSHNet

No

Page 10: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q27 Are there any current fora solely for the discussion on the convergent implementation of GHS?

Respondent skipped this question

Page 11: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q28 Please list all newly identified fora where GHS implementation convergence is or could be discussed and facilitated.

Respondent skipped this question

Page 12: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q29 What resources/support is required to encourage convergence of GHS legislation/regulations within APEC?

Respondent skipped this question

Page 13: Thank you for completing the survey

Q30 Thank you for completing this survey. Do you have any other comments to add?

Respondent skipped this question

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, December 25, 2019 12:16:51 AM
Last Modified: Wednesday, December 25, 2019 1:31:09 AM
Time Spent: 01:14:17
IP Address: 87.117.136.138

Page 1: Respondent Details

Q1 Economy **The Russian Federation**

Q2 Responding as: **Regulator**

Q3 Name of Organisation/Agency

CIS Center

Q4 Name of Respondent

[REDACTED]

Q5 Phone number of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q6 Email address of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q7 Have you provided a response to previous years' GHS Convergence Questionnaire? **Yes**

Q8 Has there been any changes in the GHS implementation in your Economy, including any new plans for changes, since you last completed the GHS Convergence Questionnaire? **Yes**

Page 2: General Information

Q9 Has your Economy adopted the GHS? **Yes**

Page 3: General Information

Q10 Which revision of GHS is currently in force in your economy? **4th Revision (2011)**

Q11 Does your Economy accept classification, Hazard and Precautionary statements based on a revision of GHS that is not currently in force in your economy (i.e. either earlier revisions or later revisions)? **No**

Page 4: Economies adopt later editions of GHS

Q12 Does your economy have a mechanism to facilitate adoption of newer revisions of GHS as they are published by the UN e.g. legislated review process, sunset clause, etc.? **No**

Q13 Please provide details

The provisions of the GHS are implemented in Russia through interstate standards (GOST). Their revision can be initiated through inclusion into the national standardization plan for the nearest two years. The process of revision usually takes at least 1.5 years.

Page 5: Economies adopt later editions of GHS

Q14 Is there a plan to adopt one or more later revision of GHS within the next five years? **Yes**

Page 6: Economies adopt later editions of GHS

Q15 Select the planned year/s for adoption **2021**

Q16 Select the revision number/s planned for adoption **7th Revision**

Q17 Please detail the process that will be used for the amendment e.g. amendment to existing regulations to refer to the later revision of the GHS, consultation with stakeholders, final approval/legislative process and projected timeline for the process.

The first drafts of revised standards will be available at the end of January 2020 for public consultation for 2 months. The second (final) versions of standards will be drafted by April 2020 taking into account the received comments from stakeholders. Next stage is the consideration among member countries, voting, acceptance (September 2020) and official approval (November 2020). The revised standards (if they are approved) will come into force in August 2021.

Page 7: Economies adopt later editions of GHS

Q18 What are the impediments to adopting later revisions of the GHS?

The procedure for standard revision was initiated in 2018 and based on the latest version of the GHS (Rev.7).

Page 8: Economies adopt common building blocks to facilitate trade

Q19 Has your Economy implemented all Categories (including sub-categories as relevant) for Flammable gas (Chapter 2.2) and Aerosol (Chapter 2.3) classes within the GHS Revision implemented in your Economy? **Yes - For both Flammable Gas and Aerosol classes**

Q20 If your Economy plans to move to a later revision of GHS, is there are plan to to adopt all Categories (including sub-categories) of Flammable Gas and Aerosol classes? **Yes - for both Flammable Gas and Aerosol classes**

Q21 Has your Economy adopted Flammable Liquid Category 4 building block? **Yes**

Q22 Has you Economy adopted Acute Toxicity Category 5 building block? **Yes**

Q23 Has you Economy adopted Skin Irritation Category 3 building block? **Yes**

Q24 Has you Economy adopted Aspiration Hazard Category 2 building block? **Yes**

Q25 Has you Economy adopted Eye Irritation category 2: **As two sub-categories, 2A and 2B**

Page 9: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q26 Are you aware of any existing forum for regulators where regulatory convergence can be discussed, other than those identified in the 2019 APEC CD GHS Convergence report i.e.: APEC Chemical Dialogue· UN GHS Sub-Committee (UNSCEGHS)· United Nations Institute for Training and Research· USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards)· ASEAN Chemical Industry Regulatory Co-operation Workshop platform · ASEAN OSHNet **No**

Page 10: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q27 Are there any current fora solely for the discussion on the convergent implementation of GHS? **Respondent skipped this question**

Page 11: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q28 Please list all newly identified fora where GHS implementation convergence is or could be discussed and facilitated.

Respondent skipped this question

Page 12: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q29 What resources/support is required to encourage convergence of GHS legislation/regulations within APEC?

Analysis of reasons of the divergent implementation of GHS building blocks and the procedure of implementation and updating of GHS across the world (this questionnaire is a good instrument for such analysis and it is reasonable to expand such analysis with live discussion), experts in the GHS and standardization, common understanding of benefits of convergence.

Page 13: Thank you for completing the survey

Q30 Thank you for completing this survey. Do you have any other comments to add?

Thank you for this survey.

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, December 26, 2019 5:54:20 PM
Last Modified: Thursday, December 26, 2019 6:02:21 PM
Time Spent: 00:08:00
IP Address: 165.76.143.32

Page 1: Respondent Details

Q1 Economy **Japan**

Q2 Responding as: Other (please specify):
 Inter-ministerial and industrial committee related to GHS of Japan

Q3 Name of Organisation/Agency

Ministry of Economy, Trade and Industry, Japan Chemical Industry Association, etc.

Q4 Name of Respondent

[REDACTED]

Q5 Phone number of the Respondent (for any follow up questions or clarifications) **Respondent skipped this question**

Q6 Email address of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q7 Have you provided a response to previous years' GHS Convergence Questionnaire? **Yes**

Q8 Has there been any changes in the GHS implementation in your Economy, including any new plans for changes, since you last completed the GHS Convergence Questionnaire? **Yes**

Page 2: General Information

Q9 Has your Economy adopted the GHS? **Yes**

Page 3: General Information

Q10 Which revision of GHS is currently in force in your economy? **6th Revision (2015)**

Q11 Does your Economy accept classification, Hazard and Precautionary statements based on a revision of GHS that is not currently in force in your economy (i.e. either earlier revisions or later revisions)? **Earlier revisions only**

Page 4: Economies adopt later editions of GHS

Q12 Does your economy have a mechanism to facilitate adoption of newer revisions of GHS as they are published by the UN e.g. legislated review process, sunset clause, etc.? **Yes**

Q13 Please provide details

Japan adapts the GHS by JIS(Japan Industrial Standards). Japan revises JIS Z7252 which provides chemical classification criteria and JIS Z7253 which stipulates format and content of SDS and labels every 5 years.

Page 5: Economies adopt later editions of GHS

Q14 Is there a plan to adopt one or more later revision of GHS within the next five years? **Yes**

Page 6: Economies adopt later editions of GHS

Q15 Select the planned year/s for adoption **2019**

Q16 Select the revision number/s planned for adoption **6th Revision**

Q17 Please detail the process that will be used for the amendment e.g. amendment to existing regulations to refer to the later revision of the GHS, consultation with stakeholders, final approval/legislative process and projected timeline for the process.

Before the global adoption of GHS, Japan had already implemented several laws relating to labeling and SDS as hazard communication of chemicals. Due to this circumstance, authorities decided to adapt JIS system for introducing GHS into these existing laws and to ensure consistency among these laws.

JIS is reviewed and the contents of GHS is prepared mainly by the industry, then the comments from the public are collected broadly and revised JIS is notified to the WTO in accordance with the TBT Agreement. Finally, JIS is issued with the approval of the Minister of Health, Labor and Welfare and the Minister of Economy, Trade and Industry after the deliberation of the Japanese Industrial Standards Committee under the Ministry of Economy, Trade and Industry.

Page 7: Economies adopt later editions of GHS

Q18 What are the impediments to adopting later revisions of the GHS?

Difference of revision cycle between GHS and JIS.

Page 8: Economies adopt common building blocks to facilitate trade

Q19 Has your Economy implemented all Categories (including sub-categories as relevant) for Flammable gas (Chapter 2.2) and Aerosol (Chapter 2.3) classes within the GHS Revision implemented in your Economy? **Yes - For both Flammable Gas and Aerosol classes**

Q20 If your Economy plans to move to a later revision of GHS, is there are plan to to adopt all Categories (including sub-categories) of Flammable Gas and Aerosol classes? **Yes - for both Flammable Gas and Aerosol classes**

Q21 Has your Economy adopted Flammable Liquid Category 4 building block? **Yes**

Q22 Has you Economy adopted Acute Toxicity Category 5 building block? **No**

Q23 Has you Economy adopted Skin Irritation Category 3 building block? **No**

Q24 Has you Economy adopted Aspiration Hazard Category 2 building block? **No**

Q25 Has you Economy adopted Eye Irritation category 2: **As a single category with no sub-categorisation**

Page 9: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q26 Are you aware of any existing forum for regulators where regulatory convergence can be discussed, other than those identified in the 2019 APEC CD GHS Convergence report i.e.: APEC Chemical Dialogue· UN GHS Sub-Committee (UNSCEGHS)· United Nations Institute for Training and Research· USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards)· ASEAN Chemical Industry Regulatory Co-operation Workshop platform · ASEAN OSHNet **No**

Page 10: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q27 Are there any current fora solely for the discussion on the convergent implementation of GHS? **Respondent skipped this question**

Page 11: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q28 Please list all newly identified fora where GHS implementation convergence is or could be discussed and facilitated. **Respondent skipped this question**

Page 12: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q29 What resources/support is required to encourage convergence of GHS legislation/regulations within APEC? **Respondent skipped this question**

Page 13: Thank you for completing the survey

Q30 Thank you for completing this survey. Do you have any other comments to add? **Respondent skipped this question**

#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 21, 2020 1:54:13 PM
Last Modified: Tuesday, January 21, 2020 2:52:49 PM
Time Spent: 00:58:36
IP Address: 120.151.32.253

Page 1: Respondent Details

Q1 Economy **Australia**

Q2 Responding as: **Industry**

Q3 Name of Organisation/Agency

Accord Australasia

Q4 Name of Respondent

[REDACTED]

Q5 Phone number of the Respondent (for any follow up questions or clarifications) **Respondent skipped this question**

Q6 Email address of the Respondent (for any follow up questions or clarifications)

[REDACTED]

Q7 Have you provided a response to previous years' GHS Convergence Questionnaire? **Yes**

Q8 Has there been any changes in the GHS implementation in your Economy, including any new plans for changes, since you last completed the GHS Convergence Questionnaire? **Yes**

Page 2: General Information

Q9 Has your Economy adopted the GHS? **Yes**

Page 3: General Information

Q10 Which revision of GHS is currently in force in your economy? **3rd Revision (2009)**

Q11 Does your Economy accept classification, Hazard and Precautionary statements based on a revision of GHS that is not currently in force in your economy (i.e. either earlier revisions or later revisions)? Other (please specify):
Mostly, no. Victoria, one of Australian States will accept GHS classification to 3rd, 4th or 5th revision of GHS.

Page 4: Economies adopt later editions of GHS

Q12 Does your economy have a mechanism to facilitate adoption of newer revisions of GHS as they are published by the UN e.g. legislated review process, sunset clause, etc.? **No**

Q13 Please provide details

There are no processes uniquely set up for regular GHS update. All legislative updates must go through the normal legislative amendment mechanisms.

Page 5: Economies adopt later editions of GHS

Q14 Is there a plan to adopt one or more later revision of GHS within the next five years? **Yes**

Page 6: Economies adopt later editions of GHS

Q15 Select the planned year/s for adoption **2020**

Q16 Select the revision number/s planned for adoption **7th Revision**

Q17 Please detail the process that will be used for the amendment e.g. amendment to existing regulations to refer to the later revision of the GHS, consultation with stakeholders, final approval/legislative process and projected timeline for the process.

Amendments to the existing Model Work Health and Safety Regulations (and related State/Territory regulations) to adopt the later revision of GHS. The adoption of GHS 7th revision is expected by 1 July 2020, with two year transition.

Page 7: Economies adopt later editions of GHS

Q18 What are the impediments to adopting later revisions of the GHS?

Lengthy process to follow for legislative amendments e.g. Regulation Impact Statement (if required), consultation on draft amendments, seeking consensus from States and Territories.

Page 8: Economies adopt common building blocks to facilitate trade

Q19 Has your Economy implemented all Categories (including sub-categories as relevant) for Flammable gas (Chapter 2.2) and Aerosol (Chapter 2.3) classes within the GHS Revision implemented in your Economy?

Yes - only for Aerosol,

If your Economy has not adopted all GHS categories for Flammable Gas and Aerosol classes for the revision of GHS that is current in your Economy, please provide a short reason.:

Flammable gas category 2 was not adopted. Prior to GHS implementation workplace storage and handling regulations referred to DG classification for physico-chemical hazards. When GHS was adopted, to maintain the same level of regulatory control as before GHS adoption, Flammable gas category 2 was not adopted.

Q20 If your Economy plans to move to a later revision of GHS, is there are plan to to adopt all Categories (including sub-categories) of Flammable Gas and Aerosol classes?

Yes - only for Aerosol,

If your Economy does not plan to adopt all GHS categories for Flammable Gas and Aerosol classes for future GHS revision updates, please provide a short reason.:

Flammable gas category 2 will not be adopted to maintain current level of regulatory control.

Q21 Has your Economy adopted Flammable Liquid Category 4 building block?

Yes,

If yes, please detail the practical implications of the adoption other than GHS hazard communication e.g. local laws relating to fire fighting, emergency response or building standards linked to the Flammable Liquid Category 4 classification.:

Storage and handling requirements are linked to the classification of flammable (and combustible) liquids. Australian Standard AS 1940 for Storage and Handling of Flammable and Combustible Liquids is generally accepted as good industry practice, although it is not mandated in legislation.

Q22 Has you Economy adopted Acute Toxicity Category 5 building block?

No

Q23 Has you Economy adopted Skin Irritation Category 3 building block?

No

Q24 Has you Economy adopted Aspiration Hazard Category 2 building block?

No

Q25 Has your Economy adopted Eye Irritation category 2:

If your Economy has NOT adopted sub-category 2B, please detail the practical implications of the non-adoption INCLUDING GHS hazard communication e.g. substances classified as eye irritant category 2B do not required GHS hazard label or SDS.:
 Due to the mechanism used to implement GHS building blocks, currently there is some confusion as to the status of Eye Irritation category 2 in Australia. The regulations will be updated to remove this confusion with the implementation of GHS 7th revision in mid-2020. It is understood that the policy intent is to implement Eye Irritation Category 2 as a single building block with flexibility to allow sub-categorisation.

Page 9: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q26 Are you aware of any existing forum for regulators where regulatory convergence can be discussed, other than those identified in the 2019 APEC CD GHS Convergence report i.e.:
 APEC Chemical Dialogue
 UN GHS Sub-Committee (UNSCEGHS)
 United Nations Institute for Training and Research
 USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards)
 ASEAN Chemical Industry Regulatory Co-operation Workshop platform
 ASEAN OSHNet

No

Page 10: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q27 Are there any current fora solely for the discussion on the convergent implementation of GHS?

Respondent skipped this question

Page 11: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q28 Please list all newly identified fora where GHS implementation convergence is or could be discussed and facilitated.

Respondent skipped this question

Page 12: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q29 What resources/support is required to encourage convergence of GHS legislation/regulations within APEC?

Understanding of the different regulatory requirements in the APEC region is necessary in order to move to convergent implementation of GHS. It must be understood that it is not a simple matter to decide on building blocks for adoption. There are implications for each building block decision, whether the decision is to implement or not to implement. For example, Economies that are currently utilising Flammable Liquid category 4 for risk management such as storage and handling requirements based on classification require significant risk assessment and consultation with relevant stakeholders e.g. fire services. Conversely, those economies that do not utilise the Flammable liquid category 4 must consider whether there are any benefits to the adoption of a hazard classification that may impact on risk management.

Page 13: Thank you for completing the survey

Q30 Thank you for completing this survey. Do you have any other comments to add?

Respondent skipped this question

#10

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 21, 2020 6:16:30 PM
Last Modified: Tuesday, January 21, 2020 6:44:35 PM
Time Spent: 00:28:05
IP Address: 220.133.249.99

Page 1: Respondent Details

Q1 Economy**Chinese Taipei****Q2 Responding as:**Other (please specify):
GHS Focal Point**Q3 Name of Organisation/Agency**

Safety and Health Technology Center (SAHTECH)

Q4 Name of Respondent**Q5 Phone number of the Respondent (for any follow up questions or clarifications)****Q6 Email address of the Respondent (for any follow up questions or clarifications)****Q7 Have you provided a response to previous years' GHS Convergence Questionnaire?****Yes****Q8 Has there been any changes in the GHS implementation in your Economy, including any new plans for changes, since you last completed the GHS Convergence Questionnaire?****No (skip questions relating to timing of GHS implementation and revision being adopted)**

Page 2: General Information

Q9 Has your Economy adopted the GHS?**Respondent skipped this question**

Page 3: General Information

Q10 Which revision of GHS is currently in force in your economy? **Respondent skipped this question**

Q11 Does your Economy accept classification, Hazard and Precautionary statements based on a revision of GHS that is not currently in force in your economy (i.e. either earlier revisions or later revisions)? **Respondent skipped this question**

Page 4: Economies adopt later editions of GHS

Q12 Does your economy have a mechanism to facilitate adoption of newer revisions of GHS as they are published by the UN e.g. legislated review process, sunset clause, etc.? **Respondent skipped this question**

Q13 Please provide details **Respondent skipped this question**

Page 5: Economies adopt later editions of GHS

Q14 Is there a plan to adopt one or more later revision of GHS within the next five years? **Respondent skipped this question**

Page 6: Economies adopt later editions of GHS

Q15 Select the planned year/s for adoption **Respondent skipped this question**

Q16 Select the revision number/s planned for adoption **Respondent skipped this question**

Q17 Please detail the process that will be used for the amendment e.g. amendment to existing regulations to refer to the later revision of the GHS, consultation with stakeholders, final approval/legislative process and projected timeline for the process. **Respondent skipped this question**

Page 7: Economies adopt later editions of GHS

Q18 What are the impediments to adopting later revisions of the GHS? **Respondent skipped this question**

Page 8: Economies adopt common building blocks to facilitate trade

Q19 Has your Economy implemented all Categories (including sub-categories as relevant) for Flammable gas (Chapter 2.2) and Aerosol (Chapter 2.3) classes within the GHS Revision implemented in your Economy? **Yes - For both Flammable Gas and Aerosol classes**

Q20 If your Economy plans to move to a later revision of GHS, is there are plan to to adopt all Categories (including sub-categories) of Flammable Gas and Aerosol classes? **Yes - for both Flammable Gas and Aerosol classes**

Q21 Has your Economy adopted Flammable Liquid Category 4 building block? **Yes**

Q22 Has you Economy adopted Acute Toxicity Category 5 building block? **Yes**

Q23 Has you Economy adopted Skin Irritation Category 3 building block? **Yes**

Q24 Has you Economy adopted Aspiration Hazard Category 2 building block? **Yes**

Q25 Has you Economy adopted Eye Irritation category 2: **As two sub-categories, 2A and 2B**

Page 9: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q26 Are you aware of any existing forum for regulators where regulatory convergence can be discussed, other than those identified in the 2019 APEC CD GHS Convergence report i.e.: APEC Chemical Dialogue· UN GHS Sub-Committee (UNSCEGHS)· United Nations Institute for Training and Research· USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards)· ASEAN Chemical Industry Regulatory Co-operation Workshop platform · ASEAN OSHNet **Yes**

Page 10: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q27 Are there any current fora solely for the discussion on the convergent implementation of GHS? **No**

Page 11: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q28 Please list all newly identified fora where GHS implementation convergence is or could be discussed and facilitated. **Respondent skipped this question**

Page 12: Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

Q29 What resources/support is required to encourage convergence of GHS legislation/regulations within APEC?

- (1) discussion of mutual acceptance of cut-off limits.
 - (2) recognition of description of classification results.
 - (3) accept industry self-classification, non-mandatory requirement.
-

Page 13: Thank you for completing the survey

Q30 Thank you for completing this survey. Do you have any other comments to add?

Thank you for raising these relevant concise issues against APEC region GHS convergence practices.

Respondent Details

Please note that for the public report, the name, phone number and the email address of the respondent will be redacted. The name of the Organisation/Agency will be published for transparency.

1. Economy

Perú

2. Responding as:

Regulator

Industry

Other (please specify)

3. Name of Organisation/Agency

Ministry of Environment

4. Name of Respondent

5. Phone number of the Respondent (for any follow up questions or clarifications)

6. Email address of the Respondent (for any follow up questions or clarifications)

7. Have you provided a response to previous years' GHS Convergence Questionnaire?

Yes

No

8. Has there been any changes in the GHS implementation in your Economy, including any new plans for changes, since you last completed the GHS Convergence Questionnaire?

Yes

No (skip questions relating to timing of GHS implementation and revision being adopted)

General Information

9. Has your Economy adopted the GHS?

Yes

No

General Information

10. Which revision of GHS is currently in force in your economy?

- Draft version
- 1st Edition (2003)
- 1st Revision (2005)
- 2nd Revision (2007)
- 3rd Revision (2009)
- Other (please specify)
- 4th Revision (2011)
- 5th Revision (2013)
- 6th Revision (2015)
- 7th Revision (2017)
- 8th Revision (2019)

11. Does your Economy accept classification, Hazard and Precautionary statements based on a revision of GHS that is not currently in force in your economy (i.e. either earlier revisions or later revisions)?

- No
- Later revisions only
- Earlier revisions only
- Other (please specify)

Our national Regulation make mandatory the use of Safety Data Sheets in different activities. Nevertheless, since GHS is not currently in force in our country, it is not possible to know which revision is being used.

Economies adopt later editions of GHS

12. Does your economy have a mechanism to facilitate adoption of newer revisions of GHS as they are published by the UN e.g. legislated review process, sunset clause, etc.?

Yes

Unsure

No

13. Please provide details

Economies adopt later editions of GHS

14. Is there a plan to adopt one or more later revision of GHS within the next five years?

Yes

No

Unsure

Economies adopt later editions of GHS

15. Select the planned year/s for adoption

- 2019 2022
- 2020 2023
- 2021

16. Select the revision number/s planned for adoption

- 4th Revision 8th Revision (publication expected 2019)
- 5th Revision 9th Revision (publication expected 2021)
- 6th Revision 10th Revision (publication expected 2023)
- 7th Revision

17. Please detail the process that will be used for the amendment e.g. amendment to existing regulations to refer to the later revision of the GHS, consultation with stakeholders, final approval/legislative process and projected timeline for the process.

The GHS will be implemented within the framework of a Law of Integral Management of Chemical Substances.

Economies adopt later editions of GHS

18. What are the impediments to adopting later revisions of the GHS?

The lack of general regulations for the application of the GHS.

Economies adopt common building blocks to facilitate trade

At the 2017 SOM3 Chemical Dialogue meeting in Ho Chi Minh City, the Virtual Working Group on GHS shared a document comparing the implementation of GHS amongst APEC Economies titled Comparison of Implementing Globally Harmonised System of Classification and Labelling Regulations Amongst the APEC Economies (agenda item 2017/SOM3/CD/012) for review and discussion.

The comparison document highlighted the divergent implementation of GHS building blocks across the APEC region.

The results from the 2019 Questionnaire, an initial study exploring potential convergent approaches using the sensitisation hazard classes, suggests that a flexible approach to GHS implementation where possible, achieves a more convergent implementation. Where health and safety concerns are raised, further risk assessment and management discussion and consideration may be required to build consensus to convergence.

For this 2020 GHS Convergence Questionnaire, we will explore the lower hazard categories that are implemented by some Economies but not others to examine further opportunities and road blocks to a more convergent implementation of GHS across the APEC region.

Some of the divergences in the choice of building blocks appear specific to the revision adopted by the Economies i.e. Flammable Gas and Aerosol classes. The questions relating to these classes will aim to confirm this assumption and draw out whether adoption of later revisions will lead to convergence.

Where the divergences in the building block adoption are unrelated to the revision adopted, specific rationale for adoption/non-adoption will be sought.

19. Has your Economy implemented all Categories (including sub-categories as relevant) for **Flammable gas (Chapter 2.2)** and **Aerosol (Chapter 2.3)** classes within the GHS Revision implemented in your Economy?

- Yes - For both Flammable Gas and Aerosol classes
- Yes - only for Flammable Gas
- Yes - only for Aerosol
- No

If your Economy has not adopted all GHS categories for Flammable Gas and Aerosol classes for the revision of GHS that is current in your Economy, please provide a short reason.

20. If your Economy plans to move to a later revision of GHS, is there are plan to to adopt all Categories (including sub-categories) of Flammable Gas and Aerosol classes?

- Yes - for both Flammable Gas and Aerosol classes
- Yes - only for Flammable Gas
- Yes - only for Aerosol
- No

If your Economy does not plan to adopt all GHS categories for Flammable Gas and Aerosol classes for future GHS revision updates, please provide a short reason.

21. Has your Economy adopted Flammable Liquid Category 4 building block?

- Yes
- No

If yes, please detail the practical implications of the adoption other than GHS hazard communication e.g. local laws relating to fire fighting, emergency response or building standards linked to the Flammable Liquid Category 4 classification.

22. Has you Economy adopted Acute Toxicity Category 5 building block?

- Yes
- No

If yes, please detail practical implications of the adoption other than GHS hazard communication e.g. triggers product registration requirement or specific storage and/or handling requirements.

23. Has your Economy adopted Skin Irritation Category 3 building block?

Yes

No

If yes, please detail practical implications of the adoption other than GHS hazard communication e.g. triggers product registration requirement or specific storage and/or handling requirements.

24. Has your Economy adopted Aspiration Hazard Category 2 building block?

Yes

No

If yes, please detail practical implications of the adoption other than GHS hazard communication e.g. triggers product registration requirement or specific storage and/or handling requirements.

25. Has your Economy adopted Eye Irritation category 2:

As a single category with no sub-categorisation

As two sub-categories, 2A and 2B

Only sub-category 2A

If your Economy has NOT adopted sub-category 2B, please detail the practical implications of the non-adoption INCLUDING GHS hazard communication e.g. substances classified as eye irritant category 2B do not required GHS hazard label or SDS.

Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

26. Are you aware of any existing forum for regulators where regulatory convergence can be discussed, **other than** those identified in the 2019 APEC CD GHS Convergence report i.e.:

- APEC Chemical Dialogue
- UN GHS Sub-Committee (UNSCEGHS)
- United Nations Institute for Training and Research
- USA/Canada Regulatory Cooperation Council initiative on GHS (Workplace Hazards)
- ASEAN Chemical Industry Regulatory Co-operation Workshop platform
- ASEAN OSHNet

Yes

No

Intergovernmental Network on Chemicals and Waste for Latin America and the Caribbean.

Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

27. Are there any current fora solely for the discussion on the convergent implementation of GHS?

Yes

No

Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

28. Please list all newly identified fora where GHS implementation convergence is or could be discussed and facilitated.

1. Intergovernmental Network on Chemicals and Waste for Latin America and the Caribbean.
2. Latin American Meeting on Chemicals Management

Regulators work with each other to find possible ways to deliver a convergent implementation of GHS

29. What resources/support is required to encourage convergence of GHS legislation/regulations within APEC?

Develop capacities on Risk Evaluation and share lessons learned regarding chemical management.

Thank you for completing the survey

30. Thank you for completing this survey. Do you have any other comments to add?