

# APEC CD GHS Implementation Convergence Questionnaire

## 2023 Progress Report

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## 1. Background

The Globally Harmonised System of Classification and Labelling of Chemicals (GHS) implementation cooperation is a continued joint effort in Chemical Dialogue (CD) to facilitate international trade. By engaging with the public-private sector dialogue and cooperation for mutual benefits, APEC members engaged in supporting regulatory cooperation and alignment in the region, APEC economies pursue GHS implementation and convergence in line with the development of the United Nation's standards.

Since the 7<sup>th</sup> CD meeting in Peru in 2008 where the report of the CD 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 yet fully realized due to divergent implementation of GHS across the regions. The divergences in GHS implementation include:

- Adoption of different revisions of GHS, given the UN GHS committee updates the Purple Book biannually.
- Adoption of different building blocks,
- Adoption of different concentration cut-offs for classification of mixtures for some building blocks, and
- Imposition of specific local requirements.

At the 21<sup>st</sup> 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. The CD also supported trialing the new reporting form, the GHS Implementation Survey (the Survey), out of session, with a view to providing an annual executive summary to the Ministers Responsible for Trade (MRT).

The Survey, in the form of a Google Forms (<https://forms.gle/mHjcXrcWQSFBDhUN9>) was circulated before the SOM I 30<sup>th</sup> CD meeting, hosted by the United States of America. A PDF file of the survey was also circulated at the same time in case the responder cannot access to the Google Form and is provided in this report. The CD encouraged delegates to respond to the Questionnaire by March 3<sup>rd</sup>, 2023 to facilitate development of the annual report by the end of July.

This Report summarizes the CD delegates' input into the Survey. Facilitating progress of 2022 report recommendations was also kept on track.

## 2. Introduction

In the wake of the global pandemic recovery, this 2023 Survey was redesigned to focus on identifying rescheduling, progress and information that may assist in convergent implementation of GHS across the region. The outcomes of the Survey are also intended to support CD's ongoing capacity building projects in development to support GHS implementation in the regions. It is structured in three Parts and aims to reflect the recommendations in the Executive Summary endorsed by Ministers regarding addressing GHS implementation divergence<sup>1</sup>, and to gather feedback on aligning GHS revision adoption, application of building blocks and requirements to achieve the CD objectives on GHS implementation. These three Parts are:

- Respondent Information;
- Implementation (GHS revision adoption, revision process, and broader acceptance);
- Requirements (building blocks, safety data sheet (SDS), labels, and enforcement and improvement of SDS quality).

All responses to the Survey are attached to this report as Attachment. The contact details of the respondents (in Part A) have been redacted as they were only requested for follow up if and as required. Following information have not been redacted to ensure transparency of responses:

- Economy;
- Whether responding as Regulator, industry or "other"; and
- Name of Organization/Agency.

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<sup>1</sup> To address divergences in GHS, 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 subcategorization options exist in GHS,
- 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.

### 3. Survey Response Summary of 2023

#### Part A: Respondent Information

Total non-repetitive responses received: 20 (4 on PDF paper submission)

Total number of responding APEC Economies: 15

Responses from regulators: 12

Responses received from industry: 5

Responses from others<sup>2</sup>: 3

APEC Economies participated in the survey of 2023

Respondent economies:

- Australia;
- Canada;
- Chile;
- Hong Kong, China;
- Japan;
- Republic of Korea;
- Malaysia;
- Mexico;
- New Zealand;
- The Philippines;
- Russia;
- Singapore;
- Chinese Taipei;
- Thailand;
- Viet Nam.

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<sup>2</sup> Japan identified as Inter-ministerial and industrial committee related to the GHS; Russia identified as NGO; Chinese Taipei identified as the GHS focal point.

## Part B: Implementation (GHS revision adoption, revision process, and broader acceptance)

### B-1. Has your economy adopted GHS?

Option	Replies	Respondent Economy
Adopted	14	Australia; Canada; Chile; Japan; Republic of Korea; Malaysia; Mexico; New Zealand; The Philippines; Russia; Singapore; Chinese Taipei; Thailand; Viet Nam.
Not adopted	1	Hong Kong, China.

### B-2. What is the scope of GHS in your economy?

Option	Replies	Respondent Economy
Industrial chemicals	14	Australia; Canada; Chile; Japan; Republic of Korea; Malaysia; Mexico; New Zealand*; The Philippines; Russia; Singapore; Chinese Taipei; Thailand; Viet Nam.
Consumer products	8	Chile; Republic of Korea; Malaysia; New Zealand*; The Philippines; Russia; Thailand; Viet Nam.
Pesticides	8	Australia; Republic of Korea; Malaysia; New Zealand; The Philippines; Russia; Chinese Taipei; Viet Nam.
Other	3	Malaysia (Transport); New Zealand (Veterinary medicines); Chinese Taipei (toxic and concerned chemicals).

#### \*Notes:

- Canada: The Canadian economy is currently working on considering consumer products in a way very similar to the current provision that exists in the U.S. HCS 2012.
- New Zealand: Industrial chemicals includes explosives and dangerous goods, and consumer products includes cosmetics.

### B-3. Which revision is currently implemented in your economy?

Option	Replies	Respondent Economy
3 <sup>rd</sup>	2	Malaysia; Thailand.
4 <sup>th</sup>	3	The Philippines; Russia; Chinese Taipei.
5 <sup>th</sup>	1	Mexico.
6 <sup>th</sup>	3	Japan; Republic of Korea; Viet Nam.
7 <sup>th</sup>	5	Australia; Canada; Chile; New Zealand; Singapore.

#### B-4. Which revision does your economy plan to adopt next, if any?

Option	Replies	Respondent Economy
7 <sup>th</sup>	2	Russia; Thailand.
8 <sup>th</sup>	3	Malaysia; The Philippines; Chinese Taipei.
Latest revision	3	Japan; Mexico; Viet Nam.
No plan to revise in the next 5 years	6	Australia; Canada; Chile; Republic of Korea; New Zealand; Singapore.

#### B-5. When does your economy plan to adopt the revision?

Option	Replies	Respondent Economy
2023	3	Malaysia; Russia; Thailand.
2024	1	Chinese Taipei.
2025	1	Viet Nam*.
2026	2	Mexico; The Philippines*.
No plan to adopt the revision in the next 5 years	6	Australia; Canada; Chile; Republic of Korea; New Zealand; Singapore.
Other	1	Japan*.

#### \*Notes:

- Viet Nam: In Viet Nam we adopt all of GHS versions except version 1.
- The Philippines: Currently a Joint Administrative Order adopting Version 8 in the Philippines is being reviewed by the GHS implementing Agencies (DENR-EMB, DOH-FDA, DOLE-OSHC, DTI-BOI and other stakeholders). This will be the basis for a respective policy among the agencies implementing GHS.
- Japan: Not determined.

#### B-6. How is GHS implemented in your economy?

Option	Replies	Respondent Economy
As a regulation	11	Australia; Canada; Chile; Japan; Republic of Korea; Malaysia; New Zealand; The Philippines; Chinese Taipei; Thailand; Viet Nam.
As a standard (mandatory)	1	Mexico.
As a standard (voluntary)	1	Russia*.
Other	1	Singapore*.

\*Notes:

- Russia: Now as a standard (voluntary). The standards will become mandatory once Technical Regulation of the Eurasian Economic Union No. 041 on the Safety of Chemicals enters into force.
- Singapore: Approved Code of Practice in SG SS586, referred to in the regulations (mandatory).

B-7. When implementing or revising the implementation of GHS, does your economy conduct an assessment to determine which GHS revision should be implemented?

Option	Replies	Respondent Economy
Yes	13	Australia; Canada; Chile; Japan; Republic of Korea; Malaysia; New Zealand; The Philippines; Russia; Singapore; Chinese Taipei; Thailand; Viet Nam.
No	1	Mexico.

B-8. If yes, what are the factors considered?

Option	Replies	Respondent Economy
The most recent revision(s)	7	Canada; Chile; Japan; New Zealand; The Philippines; Chinese Taipei; Viet Nam.
Trading partner's input	9	Canada; Japan; Republic of Korea; New Zealand; The Philippines; Russia; Singapore; Chinese Taipei; Viet Nam.
Other economies' current revision	8	Canada; Japan; Republic of Korea; New Zealand; The Philippines; Russia; Chinese Taipei; Viet Nam.
Level of protection (for human health and environment)	10	Canada; Chile; Republic of Korea; Malaysia; New Zealand; The Philippines; Russia; Singapore; Chinese Taipei; Viet Nam.
APEC Chemical Dialogue recommendations	7	Canada; Malaysia; New Zealand; The Philippines; Singapore; Chinese Taipei; Viet Nam.

B-9. Does your economy accept a revision of GHS that is not currently in force in your economy? (i.e. either earlier revisions or later revisions)

Option	Replies	Respondent Economy
Yes (all the later revisions)	7	Republic of Korea; Mexico; The Philippines; Singapore; Chinese Taipei; Thailand; Viet Nam.
Yes (all the earlier revisions)	1	Japan.

Option	Replies	Respondent Economy
Currently not, but is planning for future acceptance	1	Chile.
No	4	Australia; Canada; Malaysia; Russia.
Other	1	New Zealand*.

\*Notes:

- New Zealand: NZ accepts SDSs from certain jurisdictions that comply with the 3rd, 4th, 5th, 6th, 7th or 8th revised edition of the GHS. We also have alternative compliance provisions for labels from certain jurisdictions.

#### B-10. If yes, what are the main reasons/drivers for accepting other revisions?

- Japan: The Japanese classifications have been done since 2006 and they are based on the guidance that was adopted then. The guidance has been revised in the 2nd, 4th and 6th editions of the GHS. The answer is yes, because some of the old classification results are still in use.
- Republic of Korea: Considering of counterparty's condition.
- Mexico: Facilitate commerce.
- New Zealand: To facilitate trade and reduce compliance costs to importers.
- Singapore: For trade facilitation, for more alignment of hazard communication.
- Chinese Taipei: international trade activity.
- Thailand: to facilitate the entrepreneurs in the industrial sector.
- Viet Nam: Viet Nam is mainly imported economy so we accept all of GHS version (except version 1) for the free of international trade

#### B-11. If not, what are the main challenges or concerns for accepting other revisions?

- Canada: Labels and safety data sheets for workplace hazardous products that are intended for use, handling or storage in a work place in Canada must meet the requirements of the Hazardous Products Act and the Hazardous Products Regulations (HPR). The HPR is currently aligned with the 7th revised edition of the GHS and the Chemicals Under Pressure hazard class has been adopted from the 8th revised edition of the GHS. Initially, the HPR was based on the 5th revised edition of the GHS, except for the Flammable Gases hazard class and Aerosols hazard class, which were aligned with the 3rd revised edition of the GHS. The regulatory amendments to align with the 7th revised edition of the GHS provide a 3-year transition period, ending on December 14, 2025. Therefore, it is possible to be in compliance with either version of the HPR for this time period.



- Malaysia: (1). Different building blocks affect domestic standardization in hazard communication; (2) Hazard classification criteria is different between revision.
- Russia: Possible differences in hazard classification and labelling results (H-statements, P-statements), which might mislead end users.

**Part C: Requirements (building blocks, safety data sheet (SDS), labels, and enforcement and improvement of SDS quality)**

C-1. Does your economy adopt all building block elements of GHS (all hazard classes, categories and sub-categories)?

Option	Replies	Respondent Economy
Yes	6	Mexico; The Philippines; Russia; Chinese Taipei; Thailand; Viet Nam.
No	8	Australia; Canada; Chile; Japan; Republic of Korea; Malaysia; New Zealand; Singapore.

C-2. Does your economy accept building block elements of GHS that is not currently in force in your economy? (i.e. the GHS acute toxicity category 5)

Option	Replies	Respondent Economy
Yes (all the elements)	5	Australia; Canada; Chile; Republic of Korea; New Zealand.
Yes, but only to specific elements	2	Japan; Singapore. <i>(to answer question C-3)</i>
Currently not, but is planning for future acceptance	0	/
No	1	Malaysia. <i>(to answer question C-3)</i>

C-3. What are the obstacles to accepting every building block elements (or building blocks as implemented in other economies)?

- Japan: Almost same as the EU system.
- Malaysia: Complex for implementation/enforcement; Potential difference in level of protection for human health and the environment; Additional resources required.
- Singapore: Complex for implementation/enforcement; Additional resources required.

C-4. Does your economy accept SDS made under a different revision of GHS?

Option	Replies	Respondent Economy
Yes	6	Japan; New Zealand; The Philippines; Singapore; Thailand; Viet Nam.
No	8	Australia; Canada; Chile; Republic of Korea; Malaysia; Mexico; Russia; Chinese Taipei.

C-5. Does your economy accept SDS in English?

Option	Replies	Respondent Economy
Yes	6	Australia; Canada; Malaysia; New Zealand; The Philippines; Singapore.
Yes, but only as supplementary	5	Republic of Korea; Russia; Chinese Taipei; Thailand; Viet Nam.
No	3	Chile; Japan; Mexico.

C-6. Does your economy request the code of H-statement (i.e. H200, H300...) to be included on the SDS?

Option	Replies	Respondent Economy
Yes (mandatory)	4	Republic of Korea; Mexico; The Philippines; Russia.
Yes (voluntary)	3	Singapore; Thailand; Viet Nam.
No	7	Australia; Canada; Chile; Japan; Malaysia; New Zealand; Chinese Taipei.

C-7. Does your economy accept SDS compliant with another economy's requirements? (i.e. with slightly different section names, or information)

Option	Replies	Respondent Economy
Yes, without any change	3	Mexico; The Philippines; Thailand. <i>(to answer question C-9)</i>
Yes, with some required changes/ information	4	Canada; Republic of Korea; New Zealand; Singapore. <i>(to answer question C-8)</i>
No	7	Australia; Chile; Japan; Malaysia; Russia; Chinese Taipei; Viet Nam.

#### C-8. Please specify where changes are required:

- Canada: Translation into local language; Section 1: local information for supplier and emergency phone number.  
The SDS must be compliant with the requirements of the Hazardous Products Act (HPA; <https://laws-lois.justice.gc.ca/eng/acts/h-3/page-8.html>) and the Hazardous Products Regulations (HPR; <https://laws-lois.justice.gc.ca/eng/regulations/sor-2015-17/index.html>). The section (heading) names must be exactly the same as those set out in Schedule 1 of the HPR. Additional information (i.e., information that is not required under the HPR) is permitted to be included on the SDS, as long as the information is not false or misleading. The HPR requires for SDSs to be provided in both of Canada's official languages (English and French; either a single bilingual document or a document in two unilingual parts is acceptable).
- Republic of Korea: Section 2: reclassification under local GHS implementation.
- New Zealand: Translation into local language; Section 1: local information for supplier and emergency phone number; Section 2: reclassification under local GHS implementation (Note 1.: only for hazards to the aquatic environment and Category 4 flammable liquids where these classifications have not been adopted in the jurisdiction of origin of the SDS.); Section 8, 13, 14, 15: local regulatory information (Note 2.: only Section 15 needs to be updated for the NZ context.)
- Singapore: Translation into local language; Section 1: local information for supplier and emergency phone number; Section 2: reclassification under local GHS implementation; Section 3: specific disclosure rules (concentration ranges, use of generic names, etc.); Section 8, 13, 14, 15: local regulatory information.  
Minimum requirements need to be implemented.

#### C-9. What are the reasons/drivers for accepting SDS from other economies?

- Mexico: For international trade facilitation.
- The Philippines: For international trade facilitation; For trade agreement; For economies with same official language.
- Thailand: For international trade facilitation.  
We accept only SDS with revision or initial date not older than 5 years.

#### C-10. What are the reasons (or concerns) for not accepting SDS from other economies?

- Australia: Complex implementation/enforcement; Potential difference in level of protection for human health and the environment; Additional resources required. Safe Work Australia is the domestic policy body that implements GHS and would have to consider good practice regulation and regulation impact.

- Chile: Complex implementation/enforcement; Potential difference in level of protection for human health and the environment.
- Japan: Additional resources required.
- Malaysia: Complex implementation/enforcement; Potential difference in level of protection for human health and the environment; Additional resources required.  
(1) Language barrier for non-English SDS. Malaysia emphasizes on two languages of the SDS. (2) Different hazard class/hazard category adopted causing the SDS to be different. Malaysia has introduced Industrial Code of Practice on Chemicals Classification and Hazard Communication 2014 (ICOP CHC 2014) which explains minimum data to be in the SDS.
- Russia: Potential difference in level of protection for human health and the environment.
- Chinese Taipei: Potential difference in level of protection for human health and the environment.  
The format of SDS should be in compliance with standards and regulations.
- Viet Nam: Complex implementation/enforcement.

#### C-11. Does your economy accept labels made under a different version of GHS?

Option	Replies	Respondent Economy
Yes	7	Japan; Republic of Korea; Mexico; New Zealand; Singapore; Thailand; Viet Nam.
No	7	Australia; Canada; Chile; Malaysia; The Philippines; Russia; Chinese Taipei.

#### C-12. Does your economy accept labels in English?

Option	Replies	Respondent Economy
Yes	6	Australia; Canada; Malaysia; New Zealand; The Philippines; Singapore.
Yes, but only as supplementary	5	Republic of Korea; Russia; Chinese Taipei; Thailand; Viet Nam.
No	3	Chile; Japan; Mexico.

#### C-13. Does your economy request the code of H-statement (i.e. H200, H300...) to be included on the label?

Option	Replies	Respondent Economy
Yes (mandatory)	4	Republic of Korea; Mexico; The Philippines; Russia.
Yes (voluntary)	3	Singapore; Thailand; Viet Nam.

Option	Replies	Respondent Economy
No	7	Australia; Canada; Chile; Japan; Malaysia; New Zealand; Chinese Taipei.

C-14. Does your economy accept labels compliant with another economy's requirements? (i.e. with slightly different section names, or information)

Option	Replies	Respondent Economy
Yes, without any change	2	Thailand; Viet Nam. <i>(to answer question C-16)</i>
Yes, with some required changes/ information	7	Canada; Chile; Republic of Korea; Mexico; New Zealand; The Philippines; Singapore. <i>(to answer question C-15)</i>
No	5	Australia; Japan; Malaysia; Russia; Chinese Taipei. <i>(to answer question C-17)</i>

C-15. Please specify where changes are required:

- Canada: Translation into local language; Add local supplier information. The label must be compliant with the requirements of the Hazardous Products Act (HPA; <https://laws-lois.justice.gc.ca/eng/acts/h-3/page-8.html>) and the Hazardous Products Regulations (HPR; <https://laws-lois.justice.gc.ca/eng/regulations/sor-2015-17/index.html>). The HPR requires for labels to be provided in both of Canada's official languages (English and French; either a single bilingual label or in a group of information elements in two unilingual parts that constitute one bilingual label).
- Chile: Translation into local language; Add local supplier information.
- Republic of Korea: Depending on the condition.
- Mexico: Translation into local language; Add local supplier information.
- New Zealand: Translation into local language; Add local supplier information. All labels need to include the following New Zealand specific information: (1) New Zealand manufacturer or importer contact details; (2) New Zealand emergency contact details; (3) Information on a substance's aquatic ecotoxicity hazards as appropriate; (4) Information on terrestrial hazards (agrichemicals only).
- The Philippines: Add local supplier information.
- Singapore: Label Size; Translation into local language; Add local supplier information. Need to meet basic requirements of SS586.

C-16. What are the reasons/drivers for accepting labels from other economies?

- Thailand: For international trade facilitation.
- Viet Nam: For international trade facilitation.

C-17. What are the reasons (or concerns) for not accepting labels from other economies?

- Australia: Complex implementation/enforcement; Potential difference in level of protection for human health and the environment; Additional resources required. Safe Work Australia is the economy-wide policy body that implements GHS and would have to consider good practice regulation and regulation impact.
- Japan: Additional resources required.
- Malaysia: Complex implementation/enforcement; Potential difference in level of protection for human health and the environment; Additional resources required. Language barrier for non-English literacy and non-English SDS.
- Russia: Potential difference in level of protection for human health and the environment.
- Chinese Taipei: Potential difference in level of protection for human health and the environment.  
The format of label should be in compliance with standards and regulations.

C-18. Does your economy enforce any compliance inspection or checking of SDS in a certain way, by regulatory or standard requirements?

Option	Replies	Respondent Economy
Yes	11	Australia; Canada*; Japan; Republic of Korea; Malaysia; New Zealand*; The Philippines; Russia*; Singapore*; Chinese Taipei; Viet Nam.
No	3	Chile; China; Mexico; Thailand.

\*Notes:

- Canada: The safety data sheet and label must be compliant with the requirements of the Hazardous Products Act (HPA; <https://laws-lois.justice.gc.ca/eng/acts/h-3/page-8.html>) and the Hazardous Products Regulations (HPR; <https://laws-lois.justice.gc.ca/eng/regulations/sor-2015-17/index.html>).
- New Zealand: SDSs must comply with the Hazardous Substances (Safety Data Sheets) Notice 2017
- Russia: Voluntary quality check of the safety data sheets and classification and labelling results according to the GHS by an expert organization in accordance with GOST 30333.
- Singapore: Competent authorities such as SG Ministry of Manpower will conduct GHS

checking on SDS and labelling as part of their Workplace safety inspection. Other agencies such as National Environment Agency, Singapore Civil Defense Force and Singapore Police Force will also conduct similar checking on SDS and labelling of chemicals / products when they carried out their compliance audit (part of their regulatory requirements).

C-19. In addition to GHS compliance, does your economy acknowledge that there are issues with the quality of information provided in SDS, including its accuracy, rationality, consistency, or informativeness, among others?

Option	Replies	Respondent Economy
Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.	10	Canada*; Chile; Japan; Republic of Korea; Malaysia; Mexico; New Zealand; Singapore*; Chinese Taipei; Viet Nam.
No, SDS quality is the sole responsibility of suppliers or employers	4	Australia*; The Philippines*; Russia*; Thailand.

\*Notes:

- Australia: These answers do not allow us to communicate the complexity of the situations we experience.
- Canada: The supplier is ultimately responsible for the accuracy and currency of the SDS under the Hazardous Products Act (<https://laws-lois.justice.gc.ca/eng/acts/h-3/>).
- The Philippines: We may ask additional information if the information is not available in the SDS.
- Russia: Percentage of responsible producers who have had their safety data sheets voluntarily assessed is quite high (over 50%), so that a high quality of chemical product safety data sheets is maintained in the economy.
- Singapore: Singapore acknowledges the challenges in SDS quality, and such challenges should be addressed in an appropriate way. Singapore accepts self-classification (which is the basic principle as stated in UN GHS) as company manufacturing the chemical materials and products have the right information / data to develop the GHS classification for their products.

Singapore addresses these challenges by raising the awareness of this issue, promoting good industrial practice/ sharing and capacity building, and provide more clarity about classification cut-off/ rules for substance & mixtures and reference in the standards.

C-20. Does your economy implement any correcting measures to improve the quality of information provided in SDS, by regulators, companies, or any third parties, if any? If yes, please specify:

Option	Replies	Respondent Economy
Yes	10	Australia*; Canada*; Chile; Japan*; Republic of Korea; Malaysia*; New Zealand*; Russia*; Chinese Taipei; Viet Nam*.
No	4	Mexico; The Philippines; Singapore*; Thailand.

\*Notes:

- Australia: Where there is gross problems with SDS information, duty holders have a responsibilities to correct but ideally they would work with supplier they can trust.
- Canada: We have generated a safety data sheet compliance tool (<https://whmis.org/sds/>) to assist suppliers with the preparation of a Safety Data Sheet (SDS) for a hazardous product by providing key information about specific regulatory requirements and best practices to address the most common SDS non-compliances identified by Health Canada.
- Japan: GHS classifications are implemented and updated by the Japanese government to provide a reference for preparing a GHS label or SDS for users.
- Malaysia: (1) Through enforcement operation of the GHS-adopted regulation by DOSH officers throughout Malaysia. (2) 2. Through dialogue, engagement session and workshop with stakeholders, companies with vendors (including internal vendors) and subsidiaries supplier to improve non-compliance of SDS by providing compliance support. (3) Provide Guidance Note for principal supplier to comply with self-assessment checklist during pandemic. The Department had come up with Express SDS Self-Assessment (ESSA) and Express Labelling Self-Assessment (ELSA) to help industries prepare SDS and label in compliance with the regulation. (4) Engagement session with industrial association pertaining to chemicals.
- New Zealand: Guidance is provided to non-compliant parties, along with use of enforcement tools such as warning letters and compliance orders.
- Russia: Voluntary quality assurance procedure for these safety data sheets by an expert organization in accordance with the domestic standard GOST 30333. Domestic experience since 1995, more than 80,000 chemical product safety data sheets have been checked, about 20,000 chemical product safety data sheets have been digitized (since 2017).
- Singapore: So far, Singapore Government is not planning to implement any new measure on this. Instead, the government is working closely with the industry (esp. SCIC) to address this in the capacity building and GHS training programme.
- Viet Nam: Inspection and penalty.



## 4. Conclusion

GHS has become a common practice in part of chemical trade activities in domestic and international markets. Its wide range of applications has also been extended to workplace hazard communication, plant-protection chemicals, consumer products, chemical management schemes, and beyond. Based on the responses to the 2023 Survey in conjunction with previous 2022 and 2021's outcomes, the APEC Economies are working towards some aspects of convergent implementation of GHS, primarily the basic elements of classifications, SDS formats, and labelling. Certain types of assessment for supporting policy decision-making are also commonly exercised in line with the principle of good regulatory practice.

Regardless of some discrepancy, the benefits of broad GHS implementation are generally recognized within the markets of all APEC members and international practices. Therefore, advanced collaboration across the APEC region is required to achieve better alignment, given certain obstacles existed to prevent economies from mutual acceptance and trade facilitation to a maximum extent permitted. One of the predominate outcomes from the Survey activity is to support the development of capacity building projects. This GHS Survey can continue to support the journey for GHS convergence in the APEC regions.

### **Economies adopt later revisions of GHS**

Besides economies that have adopted the 7<sup>th</sup> revision, all economies that are planning to adopt a later revision of GHS have identified the 7<sup>th</sup> or 8<sup>th</sup> revision as the revision to adopt. The economies also identify that the implementation timing of later revisions will be around 2023 to 2026, mostly with transition periods. These proposed schedules were slightly postponed in comparison with 2021 and 2022 responses. With the plans to move to later revisions, harmonized implementation might be improved across the economies in a near future. In addition, current or planned acceptance of a newer or earlier GHS revision has been reported by several economies, which is expected to be helpful for alignment. In transition, it is important to recognize the challenging obstacles for immediate revision alignment among APEC members and beyond.

One of the major obstacles for adopting later revisions of GHS - processes of revising regulations/standards - indicates it would be challenging for economies' regulations / standards to keep up with the bi-annual GHS revision cycle against legislative and administrative procedures. Also the capacity of awareness and understanding for any newer revisions was often reported as a limitation subject to schedule and resources available. In addition, given the nature of product lifecycle on the market and in uses, it is inevitable to experience different editions of GHS information in practice. It may not be possible to cost-

effectively replace or update all products' GHS with newer version in time.

Instead of a simple claim of adoption, GHS international harmonization is a joint-effort of goal pursuit and process. Adoption of a harmonized revision of GHS is on the horizon, given the changes among bi-annual editions are minimized and the toward convergence. To overcome the temporary potential obstacles identified by APEC members during the transition, promoting a single reversion of GHS to be implemented by all APEC economies would be challenging due to the diversified regulators' agenda and resources for GHS implementation. To develop or adopt certain principles or guideline would be a transitional remedy for trade facilitation, including the promotion of encouraging more economies to accept earlier or newer revision of GHS and beyond, given the protection level for human and environment are not compromised by such inclusions.

Continuing participation and inclusion of the Survey is essential to address and resolve challenges. To ensure continued convergent implementation of the GHS revisions APEC Economies would be able to address these obstacles through the annual Survey, VWG of GHS Convergence Proposal, and capacity building events to regularly update their progress of GHS adoption.

### **Building blocks, the SDS, and labelling**

Discrepancy of bundling block adoption persisted in 2023's Survey replies. Member economies identified the divergences behind the building blocks, SDS and labeling requirements are primarily due to regulatory agenda considerations, followed by needs of management practices. Since the hazard classification, SDS and product label applying GHS basic elements has become common requirements for compliance in accordance with product responsibilities, the benefits of GHS implementation globally are overwhelmingly enjoyed in most of the occasions. Extended applications of GHS components are increasingly seen in various levels and scopes of sound chemical management practices, including registration, notification, exposure/risk assessments, control banding, substitution, and beyond.

The discrepancy of various building blocks adoption could be overridden by the prime principles of safeguarding protection and information dissemination. Future harmonization of GHS revision adoption may bring the consideration of inclusive building block approach to maximize their coverage. In transition, mutual understandings are encouraged to extend the acceptance of more or commonly agreed building blocks beyond only the regulatory basic requirements, given there are some economies have exercised such comprehensive practices. Additional requirements such as local languages and essential information etc. for proper hazard communication should be honored when distribute chemical products in a region. Requirements of individual economies can be further exchanged in experience

sharing or capacity building occasions.

### **SDS Information Quality and Improvement**

In the wake of requests of safety information and product stewardship, regulators and SDS/label users demand information quality such as the format, specification, classification, and hazardous content disclosure etc. In 2023 Survey, two third of respondents indicated that SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders. Respondents replied their implementation of certain types of quality check through public or private resources to assure compliance and proper information available in SDS and labels. Economies also specified their unique ways or tools of checking the quality. Inspection efforts and coaching played a major role in this regard to prevent from mistaking, misrepresenting, or falsifying information, further jeopardizing management and protection objectives.

Several economies also indicated trade associations and private sectors are self-regulated or voluntary checked by external third parties to assure the information accuracy. In addition to regulatory inspection enforcement, product stewardship and responsibility is another key driving force by industries' initiatives of awareness-raising, technical training, best practice etc. to overcome the challenges of secure SDS quality. This 2023 Survey collected a set of practices in different economies deserving further dialogues for trade facilitation in the regions. Further intervention can be moved forward to the upcoming capacity building project activities.

## **5. Recommendation**

Drawing from the observations and summaries of the 2023 Survey, in conjunction with previous 2022 and 2021 results, the economies are recommended to:

1. Engaging in the GHS capacity-building project activities and topic development to address the prior challenges identified in the Survey for sharing consensus and best practices;
2. Recognizing the possible obstacles identified by member economies drawn from the Survey replies;
3. Continuing to participate in the annual Survey to mutual understanding.

**Attachment APEC CD 2023 survey on GHS implementation convergence**

A-1. Economy	Australia	Canada	Canada	Chile	Hong Kong, China
A-2. Responding as:	Industry	Industry	Regulator	Regulator	Regulator
A-3. Name of organisation/ agency	Accord Australasia	Chemistry Industry Association of Canada	Health Canada	Ministerio de Salud	Trade and Industry Department
B-1. Has your economy adopted GHS?	Yes	Yes	Yes	Yes	No
B-2. What is the scope of GHS in your economy?	Industrial chemicals, Pesticides	Industrial chemicals	Industrial chemicals	Industrial chemicals, Consumer products	
Other, please specify:		The Canadian economy is currently working on considering consumer products in a way very similar to the current provision that exists in the U.S. HCS 2012			
B-3. Which revision is currently implemented in your economy?	7th	7th	7th	7th	
B-4. Which revision does your economy plan to adopt next, if any?	No plan to revise in the next 5 years	No plan to revise in the next 5 years	No plan to revise in the next 5 years	No plan to revise in the next 5 years	
B-5. When does your economy plan to adopt the revision?	2026	No plan to adopt the revision in the next 5 years	No plan to adopt the revision in the next 5 years	No plan to adopt the revision in the next 5 years	
Other, please specify:	No plan to revise in the next 5 years. Please disregard answer to B5.	Amendments to include the 7th edition were adopted in December 2022 with a transition period of 3 years for implementation.		si bien el reglamento en Chile se basó en la 7th se establecen las clases y categorías en forma específica en el reglamento y no considera todas las categorías. Dado que la implementación es en forma gradual, sólo despues del 2027 se podría revisar la versión	

A-1. Economy	Australia	Canada	Canada	Chile	Hong Kong, China
B-6. How is GHS implemented in your economy?	As a regulation	As a regulation	As a regulation	As a regulation	
B-7. When implementing or revising the implementation of GHS, does your economy conduct an assessment to determine which GHS revision should be implemented?	Yes	Yes	Yes	Yes	
B-8. If yes, what are the factors considered?		The most recent revision(s), Trading partner's input, Other economies' current revision, Level of protection (for human health and environment), APEC Chemical Dialogue recommendations	The most recent revision(s), Trading partner's input, Other economies' current revision, Level of protection (for human health and environment)	The most recent revision(s), Level of protection (for human health and environment)	
Other, please specify:	Safe Work Australia is the domestic body that implements GHS and would have to consider good practice regulation and regulation impact.				
B-9. Does your economy accept a revision of GHS that is not currently in force in your economy? (i.e. either earlier revisions or later revisions)	No	No	No	Currently not, but is planning for future acceptance	
B-10. If yes, what are the main reasons/drivers for accepting other revisions?					

A-1. Economy	Australia	Canada	Canada	Chile	Hong Kong, China
B-11. If not, what are the main challenges or concerns for accepting other revisions?		Since implementation of the GHS is associated with an act and regulations, compliance is a requirement.	Labels and safety data sheets for workplace hazardous products that are intended for use, handling or storage in a work place in Canada must meet the requirements of the Hazardous Products Act and the Hazardous Products Regulations (HPR). The HPR is currently aligned with the 7th revised edition of the GHS and the Chemicals Under Pressure hazard class has been adopted from the 8th revised edition of the GHS. Initially, the HPR was based on the 5th revised edition of the GHS, except for the Flammable Gases hazard class and Aerosols hazard class, which were aligned with the 3rd revised edition of the GHS. The regulatory amendments to align with the 7th revised edition of the GHS provide a 3-year transition period, ending on December 14, 2025. Therefore, it is possible to be in compliance with either version of the HPR for this time period.		
C-1. Does your economy adopt all building block elements of GHS (all hazard classes, categories and sub-categories)?	No	No	No	No	
C-2. Does your economy accept building block elements of GHS that is not currently in force in your economy? (i.e. the GHS acute toxicity category 5)	Yes (all the elements)	No	Yes (all the elements)	Yes (all the elements)	

A-1. Economy	Australia	Canada	Canada	Chile	Hong Kong, China
C-3. What are the obstacles to accepting every building block elements (or building blocks as implemented in other economies)?		Complex for implementation/enforcement			
Other, please specify:		Currently Sections 12 to 15 of the SDS are optional in Canada. The building blocks that have been adopted are the same as those the U.S. have adopted since both economies are working through the Regulatory Cooperation Council (RCC). The role of the RCC is to simplify and harmonize regulations between Canada and the U.S. Obviously both economies are at the same time complying with the GHS as much as possible.			
C-4. Does your economy accept SDS made under a different revision of GHS?	No	No	No	No	
C-5. Does your economy accept SDS in English?	Yes	Yes	Yes	No	
C-6. Does your economy request the code of H-statement ( <i>i.e.</i> H200, H300...) to be included on the SDS?	No	Yes (mandatory)	No	No	
C-7. Does your economy accept SDS compliant with another economy's requirements? ( <i>i.e.</i> with slightly different section names, or information)	No	No	Yes, with some required changes/information	No	

A-1. Economy	Australia	Canada	Canada	Chile	Hong Kong, China
C-8. Please specify where changes are required:			Translation into local language, Section 1: local information for supplier and emergency phone number		
Other, please specify:			The SDS must be compliant with the requirements of the Hazardous Products Act (HPA; <a href="https://laws-lois.justice.gc.ca/eng/acts/h-3/page-8.html">https://laws-lois.justice.gc.ca/eng/acts/h-3/page-8.html</a> ) and the Hazardous Products Regulations (HPR; <a href="https://laws-lois.justice.gc.ca/eng/regulations/sor-2015-17/index.html">https://laws-lois.justice.gc.ca/eng/regulations/sor-2015-17/index.html</a> ). The section (heading) names must be exactly the same as those set out in Schedule 1 of the HPR. Additional information (i.e., information that is not required under the HPR) is permitted to be included on the SDS, as long as the information is not false or misleading. The HPR requires for SDSs to be provided in both of Canada's official languages (English and French; either a single bilingual document or a document in two unilingual parts is acceptable).		
C-9. What are the reasons/drivers for accepting SDS from other economies?					
Other, please specify:					
C-10. What are the reasons (or concerns) for not accepting SDS from other economies?	Complex implementation/enforcement, Potential difference in level of protection for human health and the environment, Additional resources required	Complex implementation/enforcement		Complex implementation/enforcement, Potential difference in level of protection for human health and the environment	



A-1. Economy	Australia	Canada	Canada	Chile	Hong Kong, China
Other, please specify:	Safe Work Australia is the domestic policy body that implements GHS and would have to consider good practice regulation and regulation impact.	SDSs need to comply with Canadian legislative requirements			
C-11. Does your economy accept labels made under a different version of GHS?	No	No	No	No	
C-12. Does your economy accept labels in English?	Yes	Yes	Yes	No	
C-13. Does your economy request the code of H-statement ( <i>i.e.</i> H200, H300...) to be included on the label?	No	No	No	No	
C-14. Does your economy accept labels compliant with another economy's requirements? ( <i>i.e.</i> with slightly different section names, or information)	No	No	Yes, with some required changes/information	Yes, with some required changes/information	
C-15. Please specify where changes are required:			Translation into local language, Add local supplier information	Translation into local language, Add local supplier information	

A-1. Economy	Australia	Canada	Canada	Chile	Hong Kong, China
Other, please specify:			The label must be compliant with the requirements of the Hazardous Products Act (HPA; <a href="https://laws-lois.justice.gc.ca/eng/acts/h-3/page-8.html">https://laws-lois.justice.gc.ca/eng/acts/h-3/page-8.html</a> ) and the Hazardous Products Regulations (HPR; <a href="https://laws-lois.justice.gc.ca/eng/regulations/sor-2015-17/index.html">https://laws-lois.justice.gc.ca/eng/regulations/sor-2015-17/index.html</a> ). The HPR requires for labels to be provided in both of Canada's official languages (English and French; either a single bilingual label or in a group of information elements in two unilingual parts that constitute one bilingual label).	las clases de peligro mínimas establecidas en el reglamento	
C-16. What are the reasons/ drivers for accepting labels from other economies?					
Other, please specify:					
C-17. What are the reasons (or concerns) for not accepting labels from other economies?	Complex implementation/enforcement, Potential difference in level of protection for human health and the environment, Additional resources required	Complex implementation/enforcement			
Other, please specify:	Safe Work Australia is the domestic policy body that implements GHS and would have to consider good practice regulation and regulation impact.				

A-1. Economy	Australia	Canada	Canada	Chile	Hong Kong, China
C-18. Does your economy enforce any compliance inspection or checking of SDS in a certain way, by regulatory or standard requirements?	Yes	Yes	Yes	No	No
Other, please specify:			The safety data sheet and label must be compliant with the requirements of the Hazardous Products Act (HPA; <a href="https://laws-lois.justice.gc.ca/eng/acts/h-3/page-8.html">https://laws-lois.justice.gc.ca/eng/acts/h-3/page-8.html</a> ) and the Hazardous Products Regulations (HPR; <a href="https://laws-lois.justice.gc.ca/eng/regulations/sor-2015-17/index.html">https://laws-lois.justice.gc.ca/eng/regulations/sor-2015-17/index.html</a> )		Hong Hong, China has not adopted GHS, hence nil return for C18-C20.
C-19. In addition to GHS compliance, does your economy acknowledge that there are issues with the quality of information provided in SDS, including its accuracy, rationality, consistency, or informativeness, among others?	No, SDS quality is the sole responsibility of suppliers or employers	Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.	Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.	Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.	No, SDS quality is the sole responsibility of suppliers or employers
Other, please specify:	These answers do not allow us to communicate the complexity of the situations we experience		The supplier is ultimately responsible for the accuracy and currency of the SDS under the Hazardous Products Act ( <a href="https://laws-lois.justice.gc.ca/eng/acts/h-3/">https://laws-lois.justice.gc.ca/eng/acts/h-3/</a> ).		Hong Hong, China has not adopted GHS, hence nil return for C18-C20.
C-20. Does your economy implement any correcting measures to improve the quality of information provided in SDS, by regulators, companies, or any third parties, if any?	Yes	Yes	Yes	Yes	No

A-1. Economy	Australia	Canada	Canada	Chile	Hong Kong, China
If yes, please specify:	Where there is gross problems with SDS information, duty holders have a responsibilities to correct but ideally they would work with supplier they can trust	Tools are being developed to improve the quality of the information and workshops/seminars are organized to improve knowledge.	We have generated a safety data sheet compliance tool ( <a href="https://whmis.org/sds/">https://whmis.org/sds/</a> ) to assist suppliers with the preparation of a Safety Data Sheet (SDS) for a hazardous product by providing key information about specific regulatory requirements and best practices to address the most common SDS non-compliances identified by Health Canada.	si hay inconsistencia en información en las SDS, se solicita por parte del regulador al proveedor que realice las gestiones correspondientes para mejorar la información.	

A-1. Economy	Japan	Republic of Korea	Malaysia	Mexico	New Zealand
A-2. Responding as:	Inter-ministerial and industrial committee related to the GHS	Regulator	Regulator	Industry	Regulator
A-3. Name of organisation/agency	Ministry of Economy, Trade and Industry	National Fire Agency	Department of Occupational Safety and Health Malaysia (DOSH Malaysia)	ANIQ	Environmental Protection Authority, New Zealand
B-1. Has your economy adopted GHS?	Yes	Yes	Yes	Yes	Yes
B-2. What is the scope of GHS in your economy?	Industrial chemicals	Industrial chemicals, Consumer products, Pesticides	Industrial chemicals, Consumer products, Pesticides	Industrial chemicals	Industrial chemicals, Consumer products, Pesticides
Other, please specify:			Transport		Veterinary medicines Industrial chemicals includes explosives and dangerous goods Consumer products includes cosmetics
B-3. Which revision is currently implemented in your economy?	6th	6th	3rd	5th	7th
B-4. Which revision does your economy plan to adopt next, if any?	Latest revision	No plan to revise in the next 5 years	8th	Latest revision	No plan to revise in the next 5 years
B-5. When does your economy plan to adopt the revision?		No plan to adopt the revision in the next 5 years	2023	2026	No plan to adopt the revision in the next 5 years
Other, please specify:	Not determined.				When we update to a more recent version is dependent on a number of factors - refer to Question 16.
B-6. How is GHS implemented in your economy?	As a regulation	As a regulation	As a regulation	As a standard (mandatory)	As a regulation

A-1. Economy	Japan	Republic of Korea	Malaysia	Mexico	New Zealand
B-7. When implementing or revising the implementation of GHS, does your economy conduct an assessment to determine which GHS revision should be implemented?	Yes	Yes	Yes	No	Yes
B-8. If yes, what are the factors considered?	The most recent revision(s), Trading partner's input, Other economies' current revision	Trading partner's input, Other economies' current revision, Level of protection (for human health and environment)	Level of protection (for human health and environment), APEC Chemical Dialogue recommendations		The most recent revision(s), Trading partner's input, Other economies' current revision, Level of protection (for human health and environment), APEC Chemical Dialogue recommendations
Other, please specify:			1. Stakeholder's input and public comments 2. Recommendation of ARCP Meetings to go for ASEAN 7 3. GHS 7 & 8 almost similar		
B-9. Does your economy accept a revision of GHS that is not currently in force in your economy? ( <i>i.e. either earlier revisions or later revisions</i> )	Yes (all the earlier revisions)	Yes (all the later revisions)	No	Yes (all the later revisions)	NZ accepts SDSs from certain jurisdictions that comply with the 3rd, 4th, 5th, 6th, 7th or 8th revised edition of the GHS. We also have alternative compliance provisions for labels from certain jurisdictions (refer Q35)

A-1. Economy	Japan	Republic of Korea	Malaysia	Mexico	New Zealand
B-10. If yes, what are the main reasons/drivers for accepting other revisions?	The Japanese classifications have been done since 2006 and they are based on the guidance that was adopted then. The guidance has been revised in the 2nd, 4th and 6th editions of the GHS. The answer is yes, because some of the old classification results are still in use.	Considering of counterparty's condition		Facilitate commerce	To facilitate trade and reduce compliance costs to importers
B-11. If not, what are the main challenges or concerns for accepting other revisions?			1. Different building blocks affect domestic standardization in hazard communication 2. Hazard classification criteria is different between revision		
C-1. Does your economy adopt all building block elements of GHS (all hazard classes, categories and sub-categories)?	No	No	No	Yes	No
C-2. Does your economy accept building block elements of GHS that is not currently in force in your economy? (i.e. the GHS acute toxicity category 5)	Yes, but only to specific elements	Yes (all the elements)	No		Yes (all the elements)
C-3. What are the obstacles to accepting every building block elements (or building blocks as implemented in other economies)?			Complex for implementation/enforcement, Potential difference in level of protection for human health and the environment, Additional resources required		
Other, please specify:	Almost same as the EU system.				

A-1. Economy	Japan	Republic of Korea	Malaysia	Mexico	New Zealand
C-4. Does your economy accept SDS made under a different revision of GHS?	Yes	No	No	No	Yes
C-5. Does your economy accept SDS in English?	No	Yes, but only as supplementary	Yes	No	Yes
C-6. Does your economy request the code of H-statement ( <i>i.e.</i> H200, H300...) to be included on the SDS?	No	Yes (mandatory)	No	Yes (mandatory)	No
C-7. Does your economy accept SDS compliant with another economy's requirements? ( <i>i.e.</i> with slightly different section names, or information)	No	Yes, with some required changes/information	No	Yes, without any change	Yes, with some required changes/information
C-8. Please specify where changes are required:		Section 2: reclassification under local GHS implementation			Translation into local language, Section 1: local information for supplier and emergency phone number, Section 2: reclassification under local GHS implementation, Section 8, 13, 14, 15: local regulatory information
Other, please specify:					Comment 1. only for hazards to the aquatic environment and Category 4 flammable liquids where these classifications have not been adopted in the jurisdiction of origin of the SDS Comment 2. only Section 15 needs to be updated for the NZ context



A-1. Economy	Japan	Republic of Korea	Malaysia	Mexico	New Zealand
C-9. What are the reasons/ drivers for accepting SDS from other economies?				For international trade facilitation	
Other, please specify:					
C-10. What are the reasons (or concerns) for not accepting SDS from other economies?	Additional resources required		Complex implementation/ enforcement, Potential difference in level of protection for human health and the environment, Additional resources required		
Other, please specify:			1. Language barrier for non-English SDS. Malaysia emphasizes on two (2) languages of the SDS 2. Different hazard class / hazard category adopted causing the SDS to be different. Malaysia has introduced Industrial Code of Practice on Chemicals Classification and Hazard Communication 2014 (ICOP CHC 2014) which explains minimum data to be in the SDS		
C-11. Does your economy accept labels made under a different version of GHS?	Yes	Yes	No	Yes	Yes
C-12. Does your economy accept labels in English?	No	Yes, but only as supplementary	Yes	No	Yes
C-13. Does your economy request the code of H-statement ( <i>i.e.</i> H200, H300...) to be included on the label?	No	Yes (mandatory)	No	Yes (mandatory)	No

A-1. Economy	Japan	Republic of Korea	Malaysia	Mexico	New Zealand
C-14. Does your economy accept labels compliant with another economy's requirements? ( <i>i.e. with slightly different section names, or information</i> )	No	Yes, with some required changes/information	No	Yes, with some required changes/information	Yes, with some required changes/information
C-15. Please specify where changes are <i>required</i> :				Translation into local language, Add local supplier information	Translation into local language, Add local supplier information
<i>Other, please specify:</i>		Depending on the condition			All labels need to include the following New Zealand specific information: <ul style="list-style-type: none"> <li>• New Zealand manufacturer or importer contact details</li> <li>• New Zealand emergency contact details</li> <li>• Information on a substance's aquatic ecotoxicity hazards as appropriate</li> <li>• Information on terrestrial hazards (agrichemicals only).</li> </ul>
C-16. What are the reasons/drivers for accepting labels from other economies?					
<i>Other, please specify:</i>					
C-17. What are the reasons (or concerns) for not accepting labels from other economies?	Additional resources required		Complex implementation/enforcement, Potential difference in level of protection for human health and the environment, Additional resources required		
<i>Other, please specify:</i>			Language barrier for non-English literacy and non-English SDS		

A-1. Economy	Japan	Republic of Korea	Malaysia	Mexico	New Zealand
C-18. Does your economy enforce any compliance inspection or checking of SDS in a certain way, by regulatory or standard requirements?	Yes	Yes	Yes	No	Yes
Other, please specify:					SDSs must comply with the Hazardous Substances (Safety Data Sheets) Notice 2017
C-19. In addition to GHS compliance, does your economy acknowledge that there are issues with the quality of information provided in SDS, including its accuracy, rationality, consistency, or informativeness, among others?	Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.	Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.	Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.	Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.	Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.
Other, please specify:					
C-20. Does your economy implement any correcting measures to improve the quality of information provided in SDS, by regulators, companies, or any third parties, if any?	Yes	Yes	Yes	No	Yes

A-1. Economy	Japan	Republic of Korea	Malaysia	Mexico	New Zealand
If yes, please specify:	GHS classifications are implemented and updated by the Japanese government to provide a reference for preparing a GHS label or SDS for users.		<ol style="list-style-type: none"> <li>1. Through enforcement operation of the GHS-adopted regulation by DOSH officers throughout Malaysia.</li> <li>2. Through dialogue, engagement session and workshop with stakeholders, companies with vendors (including internal vendors) and subsidiaries supplier to improve non-compliance of SDS by providing compliance support.</li> <li>3. Provide Guidance Note for principal supplier to comply with self-assessment checklist during pandemic. The Department had come up with Express SDS Self-Assessment (ESSA) and Express Labelling Self-Assessment (ELSA) to help industries prepare SDS and label in compliance with the regulation.</li> <li>4. Engagement session with industrial association pertaining to chemicals.</li> </ol>		Guidance is provided to non-compliant parties, along with use of enforcement tools such as warning letters and compliance orders.

A-1. Economy	The Philippines	The Philippines	The Philippines	Russia	Russia
A-2. Responding as:	Regulator	Regulator	Regulator	Regulator	NGO
A-3. Name of organisation/agency	FDA	Department of Environment and Natural Resources - Environmental Management Bureau	Occupational Safety and Health Center, Department of Labor and Employment	Ministry of Industry and Trade of the Russian Federation	CIS Center
B-1. Has your economy adopted GHS?	Yes	Yes	Yes	Yes	Yes
B-2. What is the scope of GHS in your economy?	Industrial chemicals, Consumer products, Pesticides	Industrial chemicals, Consumer products, Pesticides	Industrial chemicals	Industrial chemicals, Consumer products, Pesticides	Industrial chemicals, Consumer products, Pesticides
Other, please specify:					
B-3. Which revision is currently implemented in your economy?	8th	4th	8th	4th	4th
B-4. Which revision does your economy plan to adopt next, if any?	8th	8th	9th	7th	7th
B-5. When does your economy plan to adopt the revision?	2023	2026	2026	2023	2023
Other, please specify:		Currently a Joint Administrative Order adopting Version 8 in the Philippines is being reviewed by the GHS implementing Agencies (DENR-EMB, DOH-FDA, DOLE-OSHC, DTI-BOI and other stakeholders) This will be the basis for a respective policy among the agencies implementing GHS.	Not yet decided		
B-6. How is GHS implemented in your economy?	As a regulation	As a regulation	As a regulation	Now as a standard (voluntary). The standards will become mandatory once Technical Regulation of the Eurasian Economic Union No. 041 on the Safety of Chemicals enters into force.	As a standard (voluntary). The standards will become mandatory after the entry into force of the EAEU Technical Regulation 041 "On the safety of chemical products"

A-1. Economy	The Philippines	The Philippines	The Philippines	Russia	Russia
B-7. When implementing or revising the implementation of GHS, does your economy conduct an assessment to determine which GHS revision should be implemented?	Yes	Yes	Yes	Yes	Yes
B-8. If yes, what are the factors considered?	The most recent revision(s), Other economies' current revision, Level of protection (for human health and environment)	The most recent revision(s), Trading partner's input, Other economies' current revision, Level of protection (for human health and environment), APEC Chemical Dialogue recommendations	Other economies' current revision, Level of protection (for human health and environment)	Trading partner's input, Other economies' current revision, Level of protection (for human health and environment)	Trading partner's input, Other economies' current revision, Level of protection (for human health and environment)
Other, please specify:		Multi-stakeholders Consultation			
B-9. Does your economy accept a revision of GHS that is not currently in force in your economy? ( <i>i.e. either earlier revisions or later revisions</i> )	Yes (all the earlier revisions)	Yes (all the later revisions)	Yes (all the earlier revisions)	No	No
B-10. If yes, what are the main reasons/drivers for accepting other revisions?	Need to implement transition period across sectors	n/a	For trade with other economies		
B-11. If not, what are the main challenges or concerns for accepting other revisions?				Possible differences in hazard classification and labelling results (H-statements, P-statements), which might mislead end users.	Possible differences in hazard classification and labeling results (H-phrases, P-phrases) that are misleading to end users
C-1. Does your economy adopt all building block elements of GHS (all hazard classes, categories and sub-categories)?	Yes	Yes	No	Yes	Yes

A-1. Economy	The Philippines	The Philippines	The Philippines	Russia	Russia
C-2. Does your economy accept building block elements of GHS that is not currently in force in your economy? (i.e. the GHS acute toxicity category 5)			Yes, but only to specific elements		
C-3. What are the obstacles to accepting every building block elements (or building blocks as implemented in other economies)?			Complex for implementation/enforcement		
Other, please specify:					
C-4. Does your economy accept SDS made under a different revision of GHS?	Yes	Yes	Yes	No	No
C-5. Does your economy accept SDS in English?	Yes	Yes	Yes	Yes, but only as supplementary	Yes, but only as supplementary
C-6. Does your economy request the code of H-statement (i.e. H200, H300...) to be included on the SDS?	Yes (voluntary)	Yes (mandatory)	Yes (voluntary)	Yes (mandatory)	Yes (mandatory)
C-7. Does your economy accept SDS compliant with another economy's requirements? (i.e. with slightly different section names, or information)	Yes, without any change	Yes, without any change	Yes, with some required changes/information	No	No
C-8. Please specify where changes are required:			Section 3: specific disclosure rules (concentration ranges, use of generic names, etc.)		
Other, please specify:			Not yet decided		

A-1. Economy	The Philippines	The Philippines	The Philippines	Russia	Russia
C-9. What are the reasons/drivers for accepting SDS from other economies?	For international trade facilitation	For international trade facilitation, For trade agreement, For economies with same official language			
Other, please specify:		We accept only SDS with revision or initial date not older than 5 years			
C-10. What are the reasons (or concerns) for not accepting SDS from other economies?				Potential difference in level of protection for human health and the environment	Potential difference in level of protection for human health and the environment
Other, please specify:					
C-11. Does your economy accept labels made under a different version of GHS?	Yes	No	Yes	No	No
C-12. Does your economy accept labels in English?	Yes	Yes	Yes	Yes, but only as supplementary	Yes, but only as supplementary
C-13. Does your economy request the code of H-statement ( <i>i.e. H200, H300...</i> ) to be included on the label?	Yes (voluntary)	Yes (mandatory)	Yes (voluntary)	Yes (mandatory)	Yes (mandatory)
C-14. Does your economy accept labels compliant with another economy's requirements? ( <i>i.e. with slightly different section names, or information</i> )	Yes, with some required changes/information	Yes, with some required changes/information	Yes, with some required changes/information	No	No
C-15. Please specify where changes are required:	Add local supplier information	Add local supplier information	Label Size		
Other, please specify:					
C-16. What are the reasons/drivers for accepting labels from other economies?					
Other, please specify:					



A-1. Economy	The Philippines	The Philippines	The Philippines	Russia	Russia
C-17. What are the reasons (or concerns) for not accepting labels from other economies?				Potential difference in level of protection for human health and the environment	Potential difference in level of protection for human health and the environment
Other, please specify:					
C-18. Does your economy enforce any compliance inspection or checking of SDS in a certain way, by regulatory or standard requirements?	Yes	Yes	Yes	Yes	Yes
Other, please specify:	in the submission of the application, the SDS may be asked to check on the consistency of information			Voluntary quality check of the safety data sheets and classification and labelling results according to the GHS by an expert organization in accordance with GOST 30333.	Voluntary quality control of safety data sheets and GHS classification and labeling results by an expert organization in accordance with the national standard GOST 30333
C-19. In addition to GHS compliance, does your economy acknowledge that there are issues with the quality of information provided in SDS, including its accuracy, rationality, consistency, or informativeness, among others?	No, SDS quality is the sole responsibility of suppliers or employers	No, SDS quality is the sole responsibility of suppliers or employers	Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.	No, SDS quality is the sole responsibility of suppliers or employers	No, SDS quality is the sole responsibility of suppliers or employers

A-1. Economy	The Philippines	The Philippines	The Philippines	Russia	Russia
Other, please specify:	In some cases where the SDS is not GHS compliant	We may ask additional information if the information is not available in the SDS.		Percentage of responsible producers who have had their safety data sheets voluntarily assessed is quite high (over 50%), so that a high quality of chemical product safety data sheets is maintained in the economy.	The percentage of responsible manufacturers who passed the voluntary expertise of safety data sheets is quite large (more than 50%), so the economy maintains a high quality of safety data sheets for chemicals.
C-20. Does your economy implement any correcting measures to improve the quality of information provided in SDS, by regulators, companies, or any third parties, if any?	Yes	No	Yes	Yes	Yes
If yes, please specify:	Usually we would ask for a GHS compliant SDS, if necessary			Voluntary quality assurance procedure for these safety data sheets by an expert organization in accordance with the national standard GOST 30333. National experience since 1995, more than 80,000 chemical product safety data sheets have been checked, about 20,000 chemical product safety data sheets have been digitized (since 2017).	The procedure for voluntary verification of the quality of safety data sheets by an expert organization in accordance with the national standard GOST 30333. National experience: since 1995, more than 80,000 chemical safety data sheets have been checked, about 32,000 chemical safety data sheets have been digitized (since 2017). Starting in 2020, verified SDSs are encoded in QR codes with the output of key information: hazard classification, SDS owner, Customs Codes.

A-1. Economy	Singapore	Chinese Taipei	Thailand	Thailand	Viet Nam
A-2. Responding as:	Industry	GHS Focal Point	Regulator	Industry	Regulator
A-3. Name of organisation/agency	Singapore Chemical Industry Council	Safety and Health Technology Center (SAHTECH)	Department of Industrial Works	Responsible Care Management Committee of Thailand /Chemical Industry Club / The Federation of Thai Industries	Viet Nam Chemicals Agency
B-1. Has your economy adopted GHS?	Yes	Yes	Yes	Yes	Yes
B-2. What is the scope of GHS in your economy?	Industrial chemicals	Industrial chemicals, Pesticides	Industrial chemicals, Consumer products	Industrial chemicals, Consumer products	Industrial chemicals, Consumer products, Pesticides
Other, please specify:		toxic and concerned chemicals		Animal Health	
B-3. Which revision is currently implemented in your economy?	7th	4th	3rd	3rd	6th
B-4. Which revision does your economy plan to adopt next, if any?	No plan to revise in the next 5 years	8th	7th	7th	Latest revision
B-5. When does your economy plan to adopt the revision?	No plan to adopt the revision in the next 5 years	2024	2023	2024	2025
Other, please specify:				Above answer is not yet a final plan, depending on the Regulator implementation timeline	In Viet Nam we adopt all of GHS version except version 1
B-6. How is GHS implemented in your economy?	Approved Code of Practice in SG SS586, referred to in the regulations (mandatory)	As a regulation	As a regulation	As a regulation	As a regulation

A-1. Economy	Singapore	Chinese Taipei	Thailand	Thailand	Viet Nam
B-7. When implementing or revising the implementation of GHS, does your economy conduct an assessment to determine which GHS revision should be implemented?	Yes	Yes	No	Yes	Yes
B-8. If yes, what are the factors considered?	Trading partner's input, Level of protection (for human health and environment), APEC Chemical Dialogue recommendations	The most recent revision(s), Trading partner's input, Other economies' current revision, Level of protection (for human health and environment), APEC Chemical Dialogue recommendations		The most recent revision(s), Trading partner's input, Other economies' current revision, APEC Chemical Dialogue recommendations	The most recent revision(s), Trading partner's input, Other economies' current revision, Level of protection (for human health and environment), APEC Chemical Dialogue recommendations
Other, please specify:	ARCP guidance (ASEAN7) and comparison of different revisions				
B-9. Does your economy accept a revision of GHS that is not currently in force in your economy? ( <i>i.e. either earlier revisions or later revisions</i> )	Yes (all the later revisions)	Yes (all the later revisions)	Yes (all the later revisions)	Yes (all the later revisions)	Yes (all the later revisions)
B-10. If yes, what are the main reasons/drivers for accepting other revisions?	For trade facilitation, for more alignment of hazard communication	international trade activity	to facilitate the entrepreneurs in the industrial sector.	Latest GHS update, Support international Trade & Regulatory compliance	Viet Nam is mainly imported economy so we accept all of GHS version (except version 1) for the free of international trade
B-11. If not, what are the main challenges or concerns for accepting other revisions?					

A-1. Economy	Singapore	Chinese Taipei	Thailand	Thailand	Viet Nam
C-1. Does your <i>economy</i> adopt all building block elements of GHS (all hazard classes, categories and sub-categories)?	No	Yes	Yes	Yes	Yes
C-2. Does your economy accept building block elements of GHS that is not currently in force in your economy? ( <i>i.e. the GHS acute toxicity category 5</i> )	Yes, but only to specific elements				
C-3. What are the obstacles to accepting every building block elements (or building blocks as implemented in other economies)?	Complex for implementation/enforcement, Additional resources required				
Other, please specify:	Main focus to identify, manage and control the High risk chemicals based on their use and exposure under the current regulatory scheme. It takes more effort the review and update all regulatory requirements and additional resources for both Govt and Industry to manage additional low risk area				
C-4. Does your economy accept SDS made under a different revision of GHS?	Yes	No	Yes	Yes	Yes
C-5. Does your economy accept SDS in English?	Yes	Yes, but only as supplementary	Yes, but only as supplementary	Yes	Yes, but only as supplementary
C-6. Does your economy request the code of H-statement ( <i>i.e. H200, H300...</i> ) to be included on the SDS?	Yes (voluntary)	No	Yes (voluntary)	No	Yes (voluntary)

A-1. Economy	Singapore	Chinese Taipei	Thailand	Thailand	Viet Nam
C-7. Does your economy accept SDS compliant with another economy's requirements? (i.e. with slightly different section names, or information)	Yes, with some required changes/information	No	Yes, without any change	Yes, without any change	No
C-8. Please specify where changes are required:	Translation into local language, Section 1: local information for supplier and emergency phone number, Section 2: reclassification under local GHS implementation, Section 3: specific disclosure rules (concentration ranges, use of generic names, etc.), Section 8, 13, 14, 15: local regulatory information				
Other, please specify:	Minimum requirements need to be implemented				
C-9. What are the reasons/drivers for accepting SDS from other economies?			For international trade facilitation	For international trade facilitation	
Other, please specify:					
C-10. What are the reasons (or concerns) for not accepting SDS from other economies?		Potential difference in level of protection for human health and the environment			Complex implementation/enforcement
Other, please specify:		The format of SDS should be in compliance with standards and regulations.			
C-11. Does your economy accept labels made under a different version of GHS?	Yes	No	Yes	Yes	Yes
C-12. Does your economy accept labels in English?	Yes	Yes, but only as supplementary	Yes, but only as supplementary	Yes	Yes, but only as supplementary

A-1. Economy	Singapore	Chinese Taipei	Thailand	Thailand	Viet Nam
C-13. Does your economy request the code of H-statement ( <i>i.e. H200, H300...</i> ) to be included on the label?	Yes (voluntary)	No	Yes (voluntary)	No	Yes (voluntary)
C-14. Does your economy accept labels compliant with another economy's requirements? ( <i>i.e. with slightly different section names, or information</i> )	Yes, with some required changes/information	No	Yes, without any change	Yes, without any change	Yes, without any change
C-15. Please specify where changes are required:	Label Size, Translation into local language, Add local supplier information				
Other, please specify:	Need to meet basic requirements of SS586				
C-16. What are the reasons/drivers for accepting labels from other economies?			For international trade facilitation	For international trade facilitation	For international trade facilitation
Other, please specify:					
C-17. What are the reasons (or concerns) for not accepting labels from other economies?		Potential difference in level of protection for human health and the environment			
Other, please specify:		The format of label should be in compliance with standards and regulations.			
C-18. Does your economy enforce any compliance inspection or checking of SDS in a certain way, by regulatory or standard requirements?	Yes	Yes	No	No	Yes

A-1. Economy	Singapore	Chinese Taipei	Thailand	Thailand	Viet Nam
Other, please specify:	Competent authorities such as SG Ministry of Manpower will conduct GHS checking on SDS and labelling as part of their Workplace safety inspection. Other agencies such as National Environment Agency, Singapore Civil Defence Force and Singapore Police Force will also conduct similar checking on SDS and labelling of chemicals / products when they carried out their compliance audit (part of their regulatory requirements).				
C-19. In addition to GHS compliance, does your economy acknowledge that there are issues with the quality of information provided in SDS, including its accuracy, rationality, consistency, or informativeness, among others?	Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.	Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.	No, SDS quality is the sole responsibility of suppliers or employers	No, SDS quality is the sole responsibility of suppliers or employers	Yes, SDS quality issues are frequently raised by downstream users, or laboratory, or unsatisfied stakeholders.
Other, please specify:	Singapore acknowledges the challenges in SDS quality, and such challenges should be addressed in an appropriate way. Singapore accepts self-classification (which is the basic principle as stated in UN GHS) as company manufacturing the chemical materials and products have the right information / data to develop the GHS classification for their products. Singapore addresses these challenges by raising the awareness of this issue, promoting good industrial practice/ sharing and capacity building, and provide more clarity about classification cut-off/ rules for substance & mixtures and reference in the standards.				



A-1. Economy	Singapore	Chinese Taipei	Thailand	Thailand	Viet Nam
C-20. Does your economy implement any correcting measures to improve the quality of information provided in SDS, by regulators, companies, or any third parties, if any?	No	Yes	No	No	Yes
If yes, please specify:	So far, Singapore Government is not planning to implement any new measure on this. Instead, the government is working closely with the industry (esp. SCIC) to address this in the capacity building and GHS training programme.				Inspection and penalty