

# APEC CD GHS Implementation Convergence Questionnaire

## 2022 Progress Report

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## 1. Background

GHS implementation cooperation is a continued effort in Chemical Dialogue to facilitate international trade jointly. 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 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 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. 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/UQhmxqpxikPuBhs89>) was circulated before the SOM I 28th CD virtual meeting, hosted by Thailand. The 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 with this report as Attachment 1. The CD encouraged delegates to respond to the Questionnaire by January 19th, 2022 to facilitate development of the annual report by April.

This Report summarizes the CD delegates’ input into the Survey. Facilitating progress of 2021 report recommendations was also kept on track.

## 2. Introduction

The 2022 Survey was redesigned to focus on identifying information that may assist in convergent implementation of GHS across the region. It is structured in four Sections 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, training practices and capacity building needs to achieve the CD objectives on GHS implementation. These four Sections are:

1. Basic Information
2. GHS implementation
3. Building Blocks, Safety Data Sheets, and Labels
4. Capacity Building and Training

All responses to the Survey are attached to this report as Attachment 2. The contact details of the respondents (in Section 1) 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. Actions in responding to 2021 Recommendation

2021 Survey report highlighted the following 4 areas of recommendation:

	2021 Recommendation	Actions	Expected Outcomes
1	<b>Addressing the obstacles to adopting later revisions of GHS Purple Book</b>	<ul style="list-style-type: none"> <li>● Redesigned 2022 Survey questions to solicit feedbacks from respondents.</li> <li>● The convergence proposal is laying out general best practice principles for GHS implementation. The capacity building proposal may include these issues.</li> </ul>	<b>To achieve consensus on overcoming obstacles.</b>
2	<b>Accepting later revisions, provided that the level of protection is the same or stronger with respect to a particular chemical</b>	<ul style="list-style-type: none"> <li>● The convergence proposal is a starting point for the GHS VWG to address issues related to reversion adoption.</li> <li>● The planned capacity building will help provide examples, build trust by raising awareness on GHS differences in implementations.</li> </ul>	<b>To achieve consensus on accepting newer/later revision.</b>
3	<b>Accepting classifications based on building blocks that have not been adopted by the economy as long as all the adopted building blocks are included in the classification</b>	<ul style="list-style-type: none"> <li>● The convergence proposal is a starting point for the GHS VWG. Broader acceptance of building blocks is encouraged proving there is no downgrade of protection and safety information.</li> <li>● The planned capacity building webinar will help provide examples, build trust by raising awareness on GHS differences in implementations.</li> </ul>	<b>To achieve consensus on accepting most/all building blocks for classifications.</b>
4	<b>Initiating conversations about best practice for GHS implementation for better mutual understanding of the rationales and improved addressing of differences.</b>	<ul style="list-style-type: none"> <li>● Develop topic(s) in the capacity building webinar to highlight issues.</li> <li>● The GHS VWG is initiating a comparative study, impact analysis of various elements of GHS to support a broader acceptance.</li> </ul>	<b>To achieve consensus on mutual understanding of proposed best practice options.</b>

## 4. Survey Response Summary of 2022

### Session A: Basic information

Total non-repetitive responses received: 17 (3 on PDF paper submission)

Total number of responding APEC Economies: 15 (received Thailand as a new entry but missed Canada)

Responses from regulators: 9

Responses received from industry: 6

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

Collectively, there have been total 16 APEC Economies participated in the Survey of 2021 and 2022.

APEC Economies participated in the survey of 2022

Respondent economies:

- Australia,
- Hong Kong, China,
- Indonesia,
- Japan,
- The Republic of Korea,
- Malaysia,
- New Zealand,
- Peru,
- The Republic of the Philippines,
- The Russian Federation,
- Singapore,
- Chinese Taipei
- Thailand
- United States of America, and
- Viet Nam

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

## Session B: GHS implementation

There are total 17 responses representing 15 economies, Australia; Hong Kong, China; Indonesia; Japan; the Republic of Korea; Malaysia; New Zealand; Peru; the Republic of the Philippines; the Russian Federation; Singapore; Chinese Taipei; Thailand; United States of America; and Viet Nam. Among these responses, there are 9 from government, 6 from industry, 1 representing economy's GHS implementation focal point, and 1 representing GHS inter-ministerial committee.

5 out of 17 respondents are new to this annual survey since 2021, with the new entries of Indonesia; Thailand; and United States of America respondents. Other than Indonesia and Thailand who offered their new information as 2022, only Australia indicated there was change/update from last 2021 survey on their GHS implementation convergence.

All other respondents indicated there was no change or update to their status quo. In the case that Canada participated in 2021 survey, we presumed the implementation status remaining the same as 2021 responses, since no updates to the 2022 survey was received.

All 5 new respondents indicated their adoption of GHS system, mostly in industrial chemical scope, followed by consumer products and pesticides. In addition, livestock chemical also adopts GHS in Thailand. Indonesia; Thailand; and United States of America respondents replied the 3<sup>rd</sup> revision of GHS is currently adopted in their economies.

Collectively, all of participating economies reported that GHS scope covers industrial chemicals; 4 economies (the Republic of Korea; Malaysia; New Zealand; and the Russian Federation) responded that GHS also covers consumer chemicals and pesticides; 6 economies responded that, in addition to industrial chemicals, GHS also covers pesticides (Australia; Chinese Taipei; and Vietnam) or consumer products (Indonesia; the Philippines; and Thailand).

Figure 1 shows the GHS revisions that are currently adopted or will be used in the future. The 7<sup>th</sup> of GHS was the most common GHS revision currently adopted by the reporting economies. For future adoption plans, 8 economies will move to later/newer revisions, with the 7<sup>th</sup> revision as the most common choice followed by the 8<sup>th</sup> for the future.

In this Survey, Australia and New Zealand reiterated their most recent adoption of the 7<sup>th</sup> revision of GHS, and there is no plan to revise to a newer revision in the next 5 years. 4 economies also forecasted their future planes to adopt newer versions in 2023 (Indonesia; Peru; and United States of America) and 2025 (Thailand), respectively.

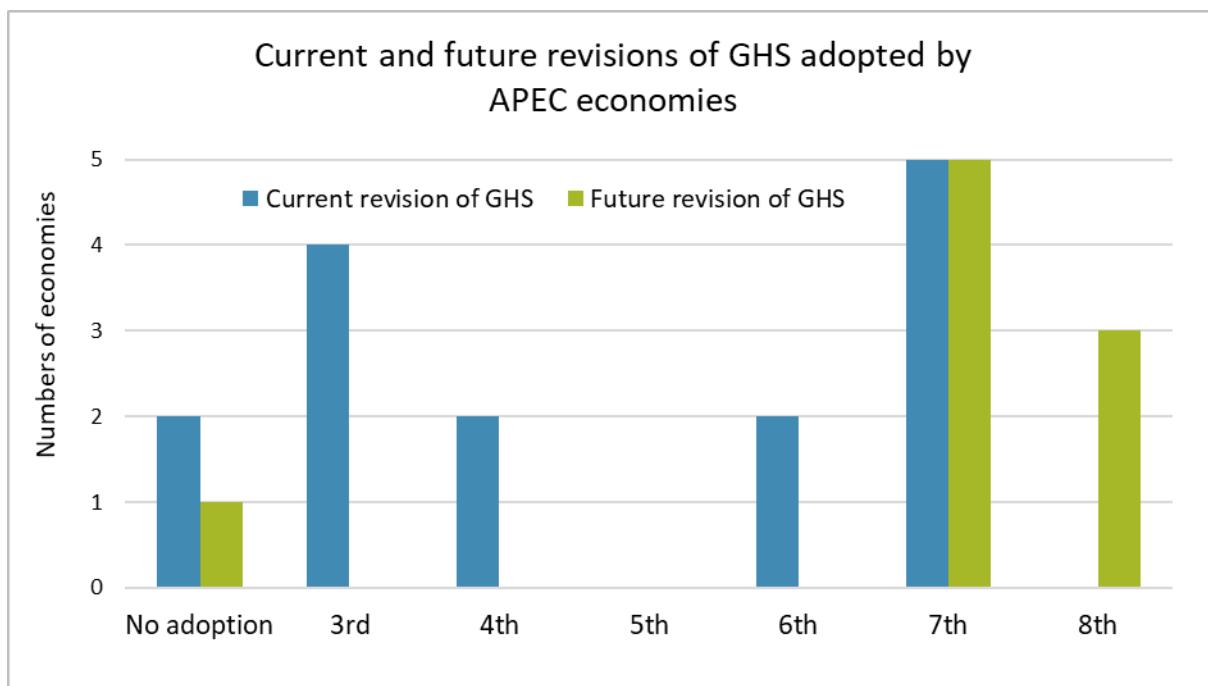


Figure 1. Current and future revisions of GHS adopted by APEC economies

By 2022 Survey closing, Indonesia; Thailand; and United States of America are using the 3<sup>rd</sup> revision; Chinese Taipei and Philippine are adopting the 4<sup>th</sup> edition; Japan and the Republic of Korea are exercising the 6<sup>th</sup> revision; with remaining economies Australia; New Zealand; the Russia Federation; Singapore and Vietnam practicing the 7<sup>th</sup> edition. Presumably Canada is still adopting the 5<sup>th</sup> according to last 2021 Survey. Hong Kong, China and Peru did not indicate the revision they intend to adopt.

When implementing or revising the implementation of GHS, all economies indicated their exercise of assessment as part of decision-making for the GHS revision adoption. These conditions revealed that certain procedures involving scientific review, administrative, regulatory process, and social economic impacts etc. will play roles in the decision of adjusting GHS standard. It may not be an easy to swiftly change the course giving the existing revision is applied in the market and regulatory compliance exercise.

It is identified that various factors influence economies' implementation and revision decision. Among the most commonly reasons include the fact that most recent GHS revision(s) becoming available, trading partner's input to make change, other economies' current adjusting action, level of protection, and APEC Chemical Dialogue recommendation. In addition, ARCP GHS implementation guideline, stakeholders' inputs and public opinions, ASEAN Regulatory Cooperation effort etc. also played the roles in some economies.

Malaysia; the Russian Federation; and United States of America do not accept a revision of GHS other than the revision currently in force in their economies. Australia; Japan; New Zealand; Peru; and the Philippines indicated they acknowledge and accept earlier revisions, the rest economies accepted all versions newer/later than the revision currently in force.

Above all, various reasons drive the economies to accept revision other than the currently version in force, such as to reduce possible trade barriers, to update scientific criteria, to facilitate trade activities, to assure human health and environment protection, for trade facilitation, to align hazard communication standard, to prevent extra time, resource for reclassification and documentation, to recognize earlier classification in place, and to acknowledge cooperation in the regions, etc.

For border control, the main considerations for NOT accepting revisions other than the version in force are the challenges and concerns over the following circumstances such as: building block difference will affect national standardization in hazard communication, hazard classification criteria harmonization, and possible difference in hazard classification results and labelling (e.g. H-statements, P-statements), resulting in misleading downstream end-users.

Indonesia; Malaysia; and the Russian Federation indicated NOT to accept building block elements of GHS that is not currently in force. The reasons behind such decision are the concerns over complexing implementation and enforcement practices, potential difference in level of protection for human health and the environment, or additional resources required to justify discrepancy. Most controversial case of non-acceptance or non-compliance is that all or more building blocks are adopted in comparison to only partial adoption of building blocks.

The Russian Federation exercised the GHS on voluntary standard basis, the others all implemented their GHS with certain regulatory or regulatory/standard combined basis schemes. Peru indicated their implementation of the GHS regulation is subject to the approval of the Law of Integral Management of Chemical Substances which is still in the stage of being promoted before the Survey was concluded.

### **Session C: Building Blocks, Safety Data Sheets (SDS), and Labels**

10 out of 14 economies indicated acceptance of SDS made under a different revision of GHS. Besides, Australia; Malaysia; the Russian Federation; and Chinese Taipei responded NO acceptance of such SDS. 8 out of 14 economies accept SDS in English, Japan and the Republic of Korea don't accept SDS in English, the rest only accept English SDS as supplementary document.



Only Indonesia and the Philippines accept SDS compliant with another economy's requirements subject to NO changes. The rest economies indicated NO acceptance. Among them, 5 economies required specific changes such as: translation into local language, local information for supplier and emergency phone number in Section 1, reclassification in Section 2 under local GHS implementation. specific disclosure rules (e.g. concentration ranges) in Section 3, local regulatory information in Section 8, 13, 14, 15, to name just a few.

The reasons or drivers for accepting SDS from other economies are identified for international trade facilitation, trade agreement, economies with same official language(s), and promote more international alignment of the SDS. On the flip-side, the reasons or concerns for NOT accepting SDS from other economies such as the concerns over complexing implementation and enforcement, offering difference in level of protection for human health and environment, requiring additional resources on the SDS.

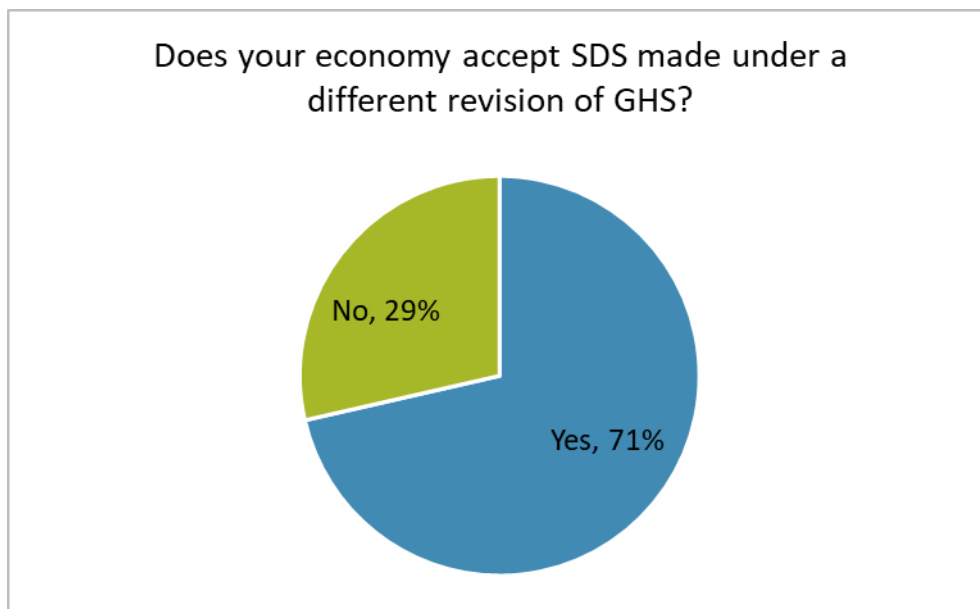


Figure 2: Does your economy accept SDS made under a different revision of GHS?

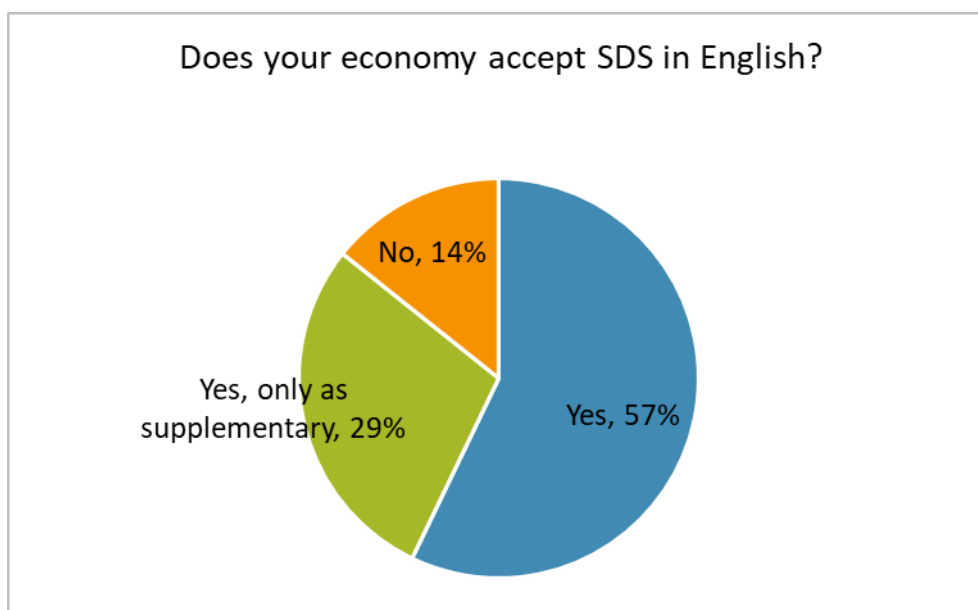


Figure 3: Does your economy accept SDS in English?

For chemical product labelling, 8 out of 13 economies indicated their acceptance of label made under a different revision of GHS. Among them, the Philippines and Peru accept label compliant with another economy's requirements needing NO changes. The rest 6 economies indicated no acceptance and 5 economies required specific changes such as: label size, translation into local language, adding local supplier information, font size, or specific layout, local phone numbers, manufacture name and address etc.

The reasons or drivers for accepting labels from other economies including international trade facilitation, trade agreement, for economies with same official language(s), promote international alignment and consistent hazard communication. On the other hand, the reasons or concerns for NOT accepting Labels from other economies such including the concerns over complexing implementation and enforcement, offering difference in level of protection for human health and environment, requiring additional resources on the label, specific labelling requirement for goods (including chemicals), language barrier for non-English literacy, format requirement according to Standards, possible misleading target audiences including workers, end-users, transport workers and emergency responders, etc.

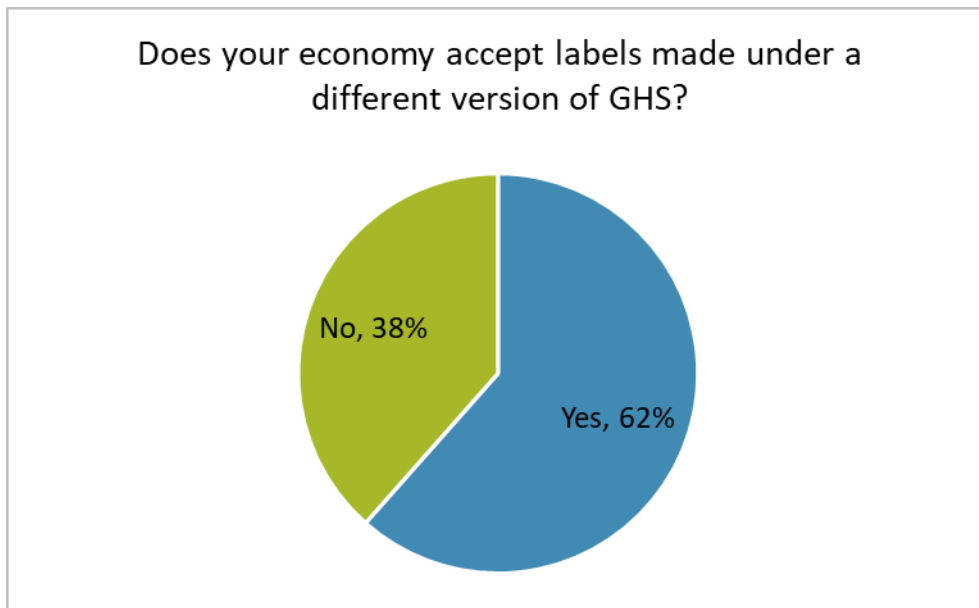


Figure 4: Does your economy accept labels made under a different version of GHS?

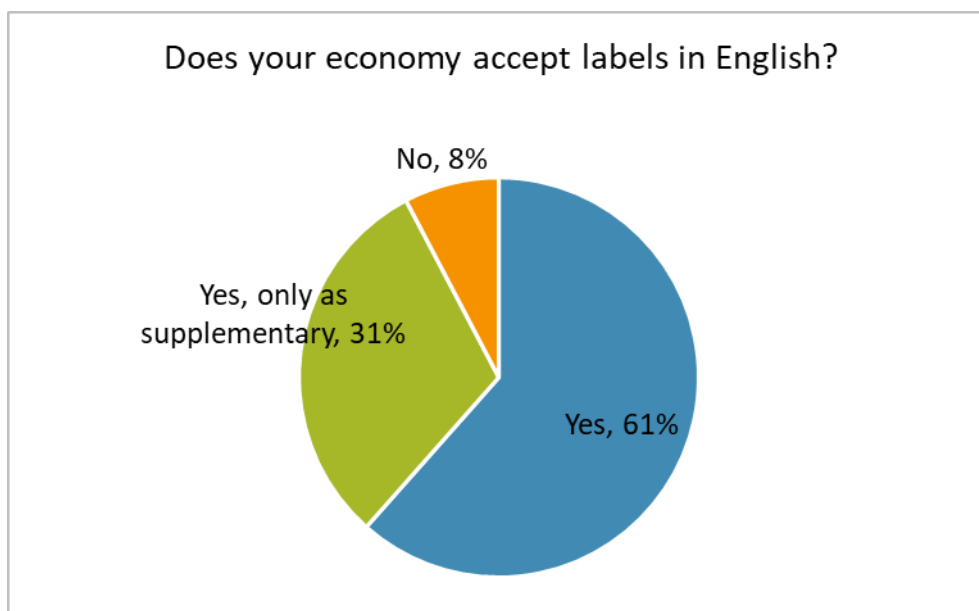


Figure 5: Does your economy accept labels in English?

#### Session D: Capacity Building and Training

9 economies indicated their availability of conducting trainings/capacity building for regulators, except Australia; Japan; the Republic of Korea; Peru; and the Russian Federation replied lacking of such resources for regulators.

Typical resources dispatched to communicate and support compliance of GHS among stakeholders including providing detailed guidance, trainings for industry, dedicated

website/platform, compliance checklist for SDS and labels examples, and financial support from authorities, tax incentives for attending GHS training, audit and enforcement activities, study project sponsored by authorities, and training for industry during the initial changeover to GHS.

Most needed capacity-building efforts identified in the Survey including awareness-raising events, GHS classification trainings for industry, dedicated website/platform, compliance checklist for SDS and label, followed by classification trainings for regulator/inspector, providing more SDS and label examples, and case-by-case SDS or labelling review.

It is also indicated needs for information update, implementation examples and to account for employee turnover, to refresh knowledge, more technical trainings for stakeholders involved in GHS exercise, development of way to assess understanding of trainings participants (evaluation process), FAQ for GHS practitioners.

In addition to regulators' efforts, most common implementation resources available to industries include consulting services, value chain support, and various IT tools. Support from industry trade association(s), fee-based training courses conducted by private consultants on GHS, technical support from other economies such as Japan AOTS (Association for Overseas Technical Scholarship). IT tools may only be limitedly available for large multi-national companies.

## **5. Conclusion**

GHS has become a common practice in part of chemical trade activities. 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 2022 Survey in accordance with 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.

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.

## **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 2021 to 2025, mostly with transition periods. 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 (draft), and capacity building events to regularly update their progress of GHS adoption. Additional information can also be delivered to address the level of protection among different revisions, particularly the 3<sup>rd</sup>, the 4<sup>th</sup>, the 7<sup>th</sup>, and the 8<sup>th</sup> of GHS revisions commonly adopted by APEC members.

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

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.

## **Demands for GHS Capacity building**

Various capacity building resources are allocated to support GHS implementation among member economies. There are continued needs for providing capacity building opportunity for many legitimately reasons such as new comers to this GHS business, change of GHS revision, new criteria adoption, and inspection practice etc. Private sectors including the industries themselves or external consulting service have also developed capacity for such needs. In addition, mutual understanding of divergence among trade partners is an area of awareness deserve attention for trade facilitation. It is observed that Chemical Dialogue is a proper platform to deliver capacity building and awareness-raising resource for the benefit of various stakeholders, regulators and industries among others, for global trade facilitation.

## **6. Recommendation**

Drawing from the observations and summaries of the Survey, the economies are recommended to:

1. Recognizing the possible obstacles identified by member economies drawn from the Survey replies;
2. Continuing to participate in the annual Survey to mutual understanding;
3. Supporting the initiatives to resolve four recommendations agreed from 2021 summary report by collaboration in the development of the GHS convergence proposal and capacity building event(s) for finding consensus of resolutions of GHS convergence.

## Attachment 1 APEC CD 2022 survey on GHS implementation convergence

1.Economy	Australia	Hong Kong, China	Indonesia	Japan	Republic of Korea
2.Responding as:	Industry	Regulator	Regulator	Inter-ministerial and industrial committee related to the GHS	Industry
3.Name of organisation/agency	Accord Australasia	Trade and Industry Department	Ministry of Industry	Ministry of Economy, Trade and Industry	Korea Chemicals Management Association
7.Have you previously participated and submitted a response to the APEC CD 2021 survey on GHS implementation?	Yes	Yes	No	No	No
8.Is there any changes or updates since the 2021 survey on GHS implementation convergence?	Yes	No			
9.Has your economy adopted GHS?	Yes			Yes	Yes
10.What is the scope of GHS in your economy?	Industrial chemicals; Pesticides		Industrial chemicals; Consumer products	Industrial chemicals	
11.Other, please specify:					



1.Economy	Australia	Hong Kong, China	Indonesia	Japan	Republic of Korea
12.Which revision is currently implemented in your economy?	7th		3rd	6th	
13.Which revision does your economy plan to adopt next, if any?	No plan to revise in the next 5 years		7th	Latest revision	
14.When does your economy plan to adopt the revision?			2023	not determined	
15.How is GHS implemented in your economy?	As a regulation		As a regulation	As a regulation	
16.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	
17.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); Trading partner's input; Other economies' current revision	

1.Economy	Australia	Hong Kong, China	Indonesia	Japan	Republic of Korea
18.Does your Economy accept a revision of GHS that is not currently in force in your economy?	Yes (all the earlier revisions)		Yes (all the later revisions)	Yes (all the earlier revisions)	
19.If yes, what are the main reasons / drivers for accepting other revisions?			Trading reason	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.	
20.If not, what are the main challenges or concerns for accepting other revisions?					
21.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, but only to specific elements	

1.Economy	Australia	Hong Kong, China	Indonesia	Japan	Republic of Korea
22.What are the obstacles to accepting every building blocks elements (or building blocks as implemented in other economies)?			Complex for implementation/enforcement		
23.Other, please specify:					
24.Does your economy accept SDS made under a different revision of GHS?	No		Yes	Yes	
25.Does your economy accept SDS in English?	Yes		Yes, only as supplementary	No	
26.Does your economy accept SDS compliant with another economy's requirements?	No		Yes, without any change	No	
27.Please specify where changes are required:					
28.Other, please specify:					
29.What are the reasons / drivers for accepting SDS from other economies?			For international trade facilitation		
30.What are the reasons (or concerns) for not accepting SDS from other economies?				Additional resources required	
31.Other, please specify:					

1.Economy	Australia	Hong Kong, China	Indonesia	Japan	Republic of Korea
32.Does your economy accept labels made under a different version of GHS?	No		No	Yes	
33.Does your economy accept labels in English?	Yes		Yes, only as supplementary	No	
34.Does your economy accept Labels compliant with another economy's requirements?	No		Yes, with some required changes/information	No	
35.Please specify where changes are required:			Label Size; Translation into local language; Add local supplier information; Font size; Specific layout		
36.C-12: Other, please specify:			Phone number		
37.What are the reasons / drivers for accepting labels from other economies?			For international trade facilitation		
38.Other, please specify:					
39.What are the reasons (or concerns) for not accepting Labels from other economies?				Additional resources required	
40.Other, please specify:					
41.Does your economy conduct trainings/capacity building for regulators ?	No		Yes	No	No

1.Economy	Australia	Hong Kong, China	Indonesia	Japan	Republic of Korea
42.Please identify resources used in your economy to communicate and support compliance with GHS:	Detailed guidance; Website/platform; Compliance checklist for SDS and labels; Examples; Financial support from authorities		Trainings for industry	Detailed guidance; Trainings for industry; Website/platform; Examples	Detailed guidance; Trainings for industry; Website/platform
43.Other, please specify:	Training for industry was given during the initial changeover to GHS				
44.Which resources or capacity building is most needed for your economy?			Awareness-raising events; GHS classification trainings for industry	GHS classification trainings for industry; Providing more SDS and label examples; Website/platform	GHS classification trainings for industry
45.Other, please specify:					
46.D-4: What are the resources available to industries other than the regulators?	Consulting services; Value chain support; IT tools		Consulting services	Consulting services	Consulting services; IT tools
47.Other, please specify:					

1.Economy	Malaysia	New Zealand	Peru
2.Responding as:	Regulator	Regulator	Regulator
3.Name of organisation/agency	Department of Occupational Safety and Health (DOSH), Malaysia	Environmental Protection Authority	Ministry of Environment
7.Have you previously participated and submitted a response to the APEC CD 2021 survey on GHS implementation?	Yes	Yes	Yes
8.Is there any changes or updates since the 2021 survey on GHS implementation convergence?	No	No	No
9.Has your economy adopted GHS?		Yes	No
10.What is the scope of GHS in your economy?		Industrial chemicals; Pesticides; Consumer products	
11.Other, please specify:		All hazardous substances (meeting classification criteria of the GHS) are covered, including in addition to above, explosives, dangerous goods, cosmetics, veterinary medicines but excluding human medicines. GHS 7 will be implemented from 30 April 2021 - previously a pre-published version (2001) of the GHS was implemented.	
12.Which revision is currently implemented in your economy?		7th	

1.Economy	Malaysia	New Zealand	Peru
13.Which revision does your economy plan to adopt next, if any?		No plan to revise in the next 5 years	8th
14.When does your economy plan to adopt the revision?			2023
15.How is GHS implemented in your economy?	As a regulation	As a regulation	The legislation on safety and environmental protection requires the use of chemical product safety data sheets (obligation), however, the use of the GHS is not detailed, so its use is voluntary.
16.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
17.If yes, what are the factors considered?	Stakeholder's input and public comments	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); APEC Chemical Dialogue recommendations; others: Other guidance documents such as those prepared by the United Nations or The Global Partnership to Implement the GHS ( <a href="https://unitar.org/global-partnership-implement-ghs">https://unitar.org/global-partnership-implement-ghs</a> )

1.Economy	Malaysia	New Zealand	Peru
18.Does your Economy accept a revision of GHS that is not currently in force in your economy?	No	Yes (all the earlier revisions)	Yes (all the earlier revisions)
19.If yes, what are the main reasons / drivers for accepting other revisions?		Reduce barriers to imports. NZ imports most chemical products and as a small market it would be unreasonable to expect products to be relabeled to meet specific NZ requirements. This broader acceptance mainly relates to labels and SDS.	National legislation on safety and health at work, as well as for the protection of the environment, indicates the obligation to have safety data sheets for the chemical products used in production activities, however, standards are not required. for these documents, making it possible to use different versions of the GHS in the economy (there is no standard that regulates the mandatory application of the GHS)
20.If not, what are the main challenges or concerns for accepting other revisions?	1. Different building block affect national standardization in hazard communication 2. Hazard classification criteria is different between revision		
21.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)?	No	Yes, but only to specific elements	Yes (all the elements)
22.What are the obstacles to accepting every building blocks 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	Complex for implementation/enforcement; Potential difference in level of protection for human health and the environment; Additional resources required	



1.Economy	Malaysia	New Zealand	Peru
23.Other, please specify:		NZ has adopted most building blocks. The ones not adopted are the lowest in the classes/subclasses. For example, acute toxicity category 5 and skin irritation category 3 are not adopted. This means that substances with these classifications are not considered hazardous substances in NZ and do not come under the regulatory requirements. So it is not a case of accepting or not accepting these building blocks, as they simply do not fit under the regulatory requirements. It is not prohibited to label substances with these classifications but there is no requirement to do so.	
24.Does your economy accept SDS made under a different revision of GHS?	No	Yes	Yes
25.Does your economy accept SDS in English?	Yes	Yes	Yes
26.Does your economy accept SDS compliant with another economy's requirements?	No	Yes, with some required changes/information	Yes
27.Please specify where changes are required:		Translation into local language; Section 1: local information for supplier and emergency phone number; Section 8, 13, 14, 15: local regulatory information	
28.Other, please specify:		SDS must be in English. In section 1, local supplier contact information and emergency phone number are required, and in section 15 local regulatory information is required.	

1.Economy	Malaysia	New Zealand	Peru
29.What are the reasons / drivers for accepting SDS from other economies?		For international trade facilitation; For trade agreement; For economies with same official language	For international trade facilitation
30.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		
31.Other, please specify:	Language barrier for non-English SDS. Malaysia emphasizes on two languages of the SDS. (i.e. in English and National Language)		
32.Does your economy accept labels made under a different version of GHS?	No	Yes	Yes
33.Does your economy accept labels in English?	Yes	Yes	Yes
34.Does your economy accept Labels compliant with another economy's requirements?	No	Yes, with some required changes/information	Yes, without any change
35.Please specify where changes are required:		Translation into local language; Add local supplier information	
36.C-12: Other, please specify:		Labels must be in English	

1.Economy	Malaysia	New Zealand	Peru
37.What are the reasons / drivers for accepting labels from other economies?		For international trade facilitation; For trade agreement; For economies with same official language	For international trade facilitation
38.Other, please specify:			
39.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		
40.Other, please specify:	Language barrier for non-English literacy and non-English SDS		
41.Does your economy conduct trainings/capacity building for regulators ?	Yes	Yes	No
42.Please identify resources used in your economy to communicate and support compliance with GHS:	Trainings for industry; Website/platform; Compliance checklist for SDS and labels; Examples	Detailed guidance; Trainings for industry; Website/platform	Trainings for industry; Examples
43.Other, please specify:	Audits, enforcement activities	Guidance on labels and SDS including checklists and examples is planned to be developed to support adoption of GHS Rev. 7.	It should be noted that, within the framework of the Project "Strengthening national capacities for the integral management of chemical substances in Peru" financed by the UNEP Special Program, it is intended to carry out trainings and workshops on GHS by the end of 2022 and the beginning of 2023

1.Economy	Malaysia	New Zealand	Peru
44.Which resources or capacity building is most needed for your economy?	Awareness-raising events; GHS classification trainings for industry; GHS classification trainings for regulators; Providing more SDS and label examples; Case-by-case SDS or labelling review; Website/platform	Awareness-raising events; Providing more SDS and label examples; Website/platform; Compliance checklist for SDS and labels	Awareness-raising events; GHS classification trainings for industry; GHS classification trainings for regulators; Providing more SDS and label examples; Case-by-case SDS or labelling review; Website/platform; Compliance checklist for SDS and labels
45.Other, please specify:			It would be advisable to have templates of communicational materials on GHS (translated into various languages, including Spanish), in order to streamline campaigns and standardize the content of what is intended to sensitize and instill in the different target audiences (civil society, industry).
46.D-4: What are the resources available to industries other than the regulators?	Consulting services; Value chain support; IT tools	Consulting services; IT tools	Consulting services; Value chain support
47.Other, please specify:	Approved training providers to conduct courses on GHS at a fee.		

1.Economy	Philippines	Philippines	The Russian Federation	Singapore	Chinese Taipei
2.Responding as:	Regulator	Industry	Regulator	Industry	GHS Focal Point
3.Name of organisation/agency	Food and Drug Administration / DENR - Environmental Management Bureau / DOLE - Occupational Safety and Health Center	Chemical Industries Association of the Philippines (SPIK)	CIS Center on behalf of the Ministry of Industry and Trade of the Russian Federation	Singapore Chemical Industry Council	Safety and Health Technology Center (SAHTECH)
7.Have you previously participated and submitted a response to the APEC CD 2021 survey on GHS implementation?	Yes	Yes	Yes	Yes	Yes
8.Is there any changes or updates since the 2021 survey on GHS implementation convergence?	No	No	No	No	No
9.Has your economy adopted GHS?					
10.What is the scope of GHS in your economy?					
11.Other, please specify:					
12.Which revision is currently implemented in your economy?					

1.Economy	Philippines	Philippines	The Russian Federation	Singapore	Chinese Taipei
13.Which revision does your economy plan to adopt next, if any?					
14.When does your economy plan to adopt the revision?					
15.How is GHS implemented in your economy?	As a regulation	As a regulation	As a standard (voluntary)	Approved Code of Practice in SG (SS586), referred to in the regulations (mandatory)	As a regulation
16.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
17.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); ASEAN Regulatory Cooperation	The most recent revision(s); Trading partner's input; Other economies' current revision	Trading partner's input; Level of protection (for human health and environment); APEC Chemical Dialogue recommendations; ARCP guidance (ASEAN7) and comparison of different revisions	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

1.Economy	Philippines	Philippines	The Russian Federation	Singapore	Chinese Taipei
18.Does your Economy accept a revision of GHS that is not currently in force in your economy?	Yes (all the earlier revisions)	Yes (all the later revisions)	No	Yes (all the later revisions)	Yes (all the later revisions)
19.If yes, what are the main reasons / drivers for accepting other revisions?	Consideration to the industry/stakeholders as GHS reclassification and the consequent revision of GHS documents would require time and resources; In coherence with other regulating bodies; Other regulators might be implementing other revisions than the latest ones	To facilitate trade and cooperation among other economies		For trade facilitation, for more alignment of hazard communication	to reduce possible trade barriers
20.If not, what are the main challenges or concerns for accepting other revisions?			Possible difference in hazard classification results and labelling (H-statements, P-statements) and misleading end-users		
21.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)	Yes (all the elements)	No	Yes (all the elements)	Yes (all the elements)

1.Economy	Philippines	Philippines	The Russian Federation	Singapore	Chinese Taipei
22.What are the obstacles to accepting every building blocks elements (or building blocks as implemented in other economies)?					
23.Other, please specify:			The GHS implementation in our Economy was performed taking into account all building blocks elements		
24.Does your economy accept SDS made under a different revision of GHS?	Yes	Yes	No	Yes	No
25.Does your economy accept SDS in English?	Yes	Yes	Yes, only as supplementary	Yes	Yes, only as supplementary
26.Does your economy accept SDS compliant with another economy's requirements?	Yes, with some required changes/information	Yes, without any change	No	Yes, with some required changes/information	No



1.Economy	Philippines	Philippines	The Russian Federation	Singapore	Chinese Taipei
27.Please specify where changes are required:	Translation into local language			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	
28.Other, please specify:	Translation into local language (English at least)			Minimum requirements need to be implemented	
29.What are the reasons / drivers for accepting SDS from other economies?	For international trade facilitation; For trade agreement	For international trade facilitation; For trade agreement		For international trade facilitation; promote more alignment for the SDS	
30.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		
31.Other, please specify:			Potential difference in control parameters		The format of SDS should be in compliance with standards and regulations.

1.Economy	Philippines	Philippines	The Russian Federation	Singapore	Chinese Taipei
32.Does your economy accept labels made under a different version of GHS?	Yes	Yes	No	Yes	No
33.Does your economy accept labels in English?	Yes	Yes	Yes, only as supplementary	Yes	Yes, only as supplementary
34.Does your economy accept Labels compliant with another economy?☐ requirements?	Yes, with some required changes/information	Yes, without any change	No	Yes, with some required changes/information	No
35.Please specify where changes are required:	Translation into local language; Add local supplier information			Label Size; Translation into local language; Add local supplier information	
36.C-12: Other, please specify:	Other local labeling requirements besides those required based on GHS			Need to meet basic requirements of SS586	
37.What are the reasons / drivers for accepting labels from other economies?	For international trade facilitation	For international trade facilitation; For trade agreement		For international trade facilitation; promote alignment and consistent hazard communication	
38.Other, please specify:					
39.What are the reasons (or concerns) for not accepting Labels from other economies?					

1.Economy	Philippines	Philippines	The Russian Federation	Singapore	Chinese Taipei
40.Other, please specify:			Potential misleading target audiences (workers, end-users, transport workers and emergency responders)		The format of label should be in compliance with standards and regulations.
41.Does your economy conduct trainings/capacity building for regulators ?	Yes	Yes	No	Yes	Yes
42.Please identify resources used in your economy to communicate and support compliance with GHS:	Detailed guidance; Trainings for industry; Website/platform	Detailed guidance; Trainings for industry	Detailed guidance; Trainings for industry; Examples	Detailed guidance; Trainings for industry; Website/platform; Compliance checklist for SDS and labels; Examples	Trainings for industry; Website/platform; Compliance checklist for SDS and labels; Examples
43.Other, please specify:				Financial support from authorities (tax incentives) for attending GHS training	
44.Which resources or capacity building is most needed for your economy?	Awareness-raising events; GHS classification trainings for industry; GHS classification trainings for regulators; Providing more SDS and label examples; Case-by-case SDS or labelling review; Website/platform; Compliance checklist for SDS and labels	Awareness-raising events; Compliance checklist for SDS and labels	Awareness-raising events; Website/platform	Awareness-raising events; GHS classification trainings for industry; GHS classification trainings for regulators; Providing more SDS and label examples; Case-by-case SDS or labelling review; Website/platform; Compliance checklist for SDS and labels	GHS classification trainings for industry; Case-by-case SDS or labelling review; Compliance checklist for SDS and labels

1.Economy	Philippines	Philippines	The Russian Federation	Singapore	Chinese Taipei
45.Other, please specify:				Still high need for updated information, examples and to account for employee turnover, to refresh knowledge. Need more technical trainings for people involved in GHS. Need to develop a way to assess understanding of trainings participants (evaluation process). Need to develop a FAQ for GHS practitioners	
46.D-4: What are the resources available to industries other than the regulators?	Consulting services;IT tools	Value chain support	Consulting services	Consulting services; Value chain support; IT tools	Consulting services; Value chain support; IT tools
47.Other, please specify:	Support from their industry association	Technical support from other economies such as Japan AOTS (Association for Overseas Technical Scholarship)			

1.Economy	Thailand	Thailand	United States	Vietnam
2.Responding as:	Regulator	Industry	Industry	Regulator
3.Name of organisation/agency	Department of Industrial Works	Responsible Care Management Committee of Thailand /Chemical Industry Club / The Federation of Thai Industries	American Chemistry Council (ACC)	Vietnam Chemicals Agency
7.Have you previously participated and submitted a response to the APEC CD 2021 survey on GHS implementation?	No	No	No	Yes
8.Is there any changes or updates since the 2021 survey on GHS implementation convergence?				No
9.Has your economy adopted GHS?	Yes	Yes	Yes	
10.What is the scope of GHS in your economy?	Industrial chemicals; Consumer products	Industrial chemicals; Consumer products	Industrial chemicals	
11.Other, please specify:		Livestock chemicals		
12.Which revision is currently implemented in your economy?	3rd	3rd	3rd	
13.Which revision does your economy plan to adopt next, if any?	7th	7th	7th	

1.Economy	Thailand	Thailand	United States	Vietnam
14.When does your economy plan to adopt the revision?	2025	2023	2023	
15.How is GHS implemented in your economy?	As a regulation	As a regulation	As a regulation	As a regulation
16.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
17.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);APEC Chemical Dialogue recommendations; ARCP GHS implementation guideline (GHS7)	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

1.Economy	Thailand	Thailand	United States	Vietnam
18.Does your Economy accept a revision of GHS that is not currently in force in your economy?	Yes (all the later revisions)	Yes (all the later revisions)	No	Yes (all the later revisions)
19.If yes, what are the main reasons / drivers for accepting other revisions?	Trade facilitator, while human health and environment are still protected.	New revisions are more updated than implemented regulations (3Re.)		In Vietnam, we accept all the version of GHS since 2007
20.If not, what are the main challenges or concerns for accepting other revisions?			Compliance with the mandatory USA/OSHA GHS implementation requirements and potentially lowering protection are concerns. Information beyond the required information is allowed if it does not contradict or cast doubt on the required information.	
21.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)	Yes (all the elements)	Yes (all the elements)	Yes (all the elements)
22.What are the obstacles to accepting every building blocks elements (or building blocks as implemented in other economies)?				
23.Other, please specify:				

1.Economy	Thailand	Thailand	United States	Vietnam
24.Does your economy accept SDS made under a different revision of GHS?	Yes	Yes	Yes	Yes
25.Does your economy accept SDS in English?	Yes, only as supplementary	Yes	Yes	Yes, only as supplementary
26.Does your economy accept SDS compliant with another economy?☐ requirements?	Yes, with some required changes/information	Yes, with some required changes/information	Yes, with some required changes/information	No
27.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.)	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	
28.Other, please specify:		Section 9, 11, 12, 14	Addition USA/OSHA non-GHS hazards are required, as appropriate. Carcinogen listing by NTP, OSHA, IARC. Information from other economies can not contradict or cast doubt on the required information.	
29.What are the reasons / drivers for accepting SDS from other economies?	For international trade facilitation	For international trade facilitation	This is a question for regulators to answer.	



1.Economy	Thailand	Thailand	United States	Vietnam
30.What are the reasons (or concerns) for not accepting SDS from other economies?				
31.Other, please specify:				We accept only SDS format in GHS book
32.Does your economy accept labels made under a different version of GHS?	Yes	Yes	Yes	Yes
33.Does your economy accept labels in English?	Yes, only as supplementary	Yes	Yes	Yes, only as supplementary
34.Does your economy accept Labels compliant with another economy? <sup>2</sup> requirements?	Yes, with some required changes/information	Yes, with some required changes/information	Yes, with some required changes/information	No
35.Please specify where changes are required:	Translation into local language; Add local supplier information	Add local supplier information	Translation into local language; Add local supplier information	
36.C-12: Other, please specify:		Manufacturer name & address	Label must include additional USA/OSHA non-GHS hazards, as appropriate. Pictograms must have a red border. Information from other economies may be provided as supplemental as long as it does not contradict or cast doubt on the required information.	
37.What are the reasons / drivers for accepting labels from other economies?	For international trade facilitation	For international trade facilitation	This a a question for regulators to answer.	

1.Economy	Thailand	Thailand	United States	Vietnam
38.Other, please specify:			This is a question for regulators to answer.	
39.What are the reasons (or concerns) for not accepting Labels from other economies?				
40.Other, please specify:				In Vietnam, we have separate regulation on the labelling of goods (including chemicals)
41.Does your economy conduct trainings/capacity building for regulators ?	Yes	Yes	Yes	Yes
42.Please identify resources used in your economy to communicate and support compliance with GHS:	Detailed guidance; Trainings for industry; Examples	Detailed guidance; Trainings for industry; Website/platform; Examples	Detailed guidance; Website/platform; Examples	Detailed guidance; Trainings for industry; Website/platform
43.Other, please specify:		Study project sponsorship by Authorities	OSHA has provided some training to their own employees (regulators). Via emails to stakeholders, OSHA provides information on UNITAR GHS training courses.	
44.Which resources or capacity building is most needed for your economy?	GHS classification trainings for industry; GHS classification trainings for regulators; Providing more SDS and label examples; Case-by-case SDS or labelling review; Website/platform; Compliance checklist for SDS and labels	Providing more SDS and label examples; Case-by-case SDS or labelling review; Website/platform; Compliance checklist for SDS and labels	Providing more SDS and label examples; Compliance checklist for SDS and labels	Awareness-raising events; GHS classification trainings for industry; GHS classification trainings for regulators; Website/platform; Compliance checklist for SDS and labels

1.Economy	Thailand	Thailand	United States	Vietnam
45.Other, please specify:	IT tools			
46.D-4: What are the resources available to industries other than the regulators?	Consulting services; Value chain support; IT tools	Consulting services; Value chain support; IT tools	Consulting services; Value chain support; IT tools	Consulting services; IT tools
47.Other, please specify:		IT tools are limitedly available for large MNCs	Professional associations (e.g., SCHC.org), trade associations (e.g., American Chemistry Council)	