2025 UNITAR GHS Webinar

Exchanging Industry Experiences During GHS Implementation

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Specific challenges related to the implementation of the Globally Harmonized System (GHS) in the industry:

❑ **GHS Revision**

1. **Different Revisions Adopted by Different Countries**: Countries may adopt different versions of GHS, leading to inconsistencies in classification and labeling.
2. **No Minimum Requirement**: There is no standardized minimum requirement for GHS implementation, causing variability in compliance.
3. **Lack of Comparison Documents**: There is no comprehensive document comparing different GHS revisions, although efforts like those by **APEC CD VWG are underway**.

❑ **Regulatory Impact Assessment and transition period**

1. **Infrastructure and Resource:** Implementing GHS requires significant changes in infrastructure and resources, which can be challenging for both regulators and industries.
2. **Regulatory Changes** – Incorporation of New Hazard Classes/Categories into the Controlled Chemical List and Introduction of New Licensing Requirements. This may necessitate planning for and including an extended transition period for implementation.
3. **Regulatory Impact:** Assessing the regulatory impact of GHS implementation can be complex and resource-intensive.

ARCP created a proposal for GHS convergence, including a GHS implementation checklist and a comparison of GHS requirements in the ASEAN region. Meanwhile, APEC CD developed a guidance document on adopting GHS and its higher revisions.

❑ **GHS Classification**

1. **Adaptation of Different Building Blocks**: Countries may choose different building blocks for classification, leading to variations in hazard communication.
2. **Higher/Lower Cut-off Limits**: Different cut-off limits for hazardous substances can affect classification outcomes.
3. **Waste Classification**: Classifying waste mixtures under GHS can be particularly challenging due to varying compositions.

❑ **GHS Safety Data Sheets (SDS)**

1. **Changes in Headings and Sub-headings**: The structure of SDS may vary, requiring updates to headings and sub-headings.
2. **Emergency Contact Number Requirement**: Including emergency contact numbers in SDS can be a regulatory requirement that varies by region.
3. **Changes in Hazard and Precautionary Statements**: Updating hazard and precautionary statements to align with GHS can be time-consuming and complex.

Specific challenges related to the implementation of the Globally Harmonized System (GHS) in the industry:

❑ **GHS Labelling (compliance cost increase)**
1. **Different Label Sizes and Font Sizes**: Variations in label and font sizes can create inconsistencies and confusion.
2. Import for storage and re-export
3. Re-packing to small packs
4. **Quality Requirements**: Some country may impose additional quality requirements for labels.
5. **Application of GHS Labels**: This is supposed for packaging (like container and packed products). Determining when and where to apply GHS labels can be complex, especially for tanks, IBC tanks, pipelines, and pumps, process streams, samples etc.
6. **Pictograms –** Color and Maximum Number Displayed on Labels (Cost increase)

❑ **Workplace Labelling**
1. **Different Sizes**: Labels in the workplace may need to be different sizes depending on the application.
2. Use in production and lab – hazard information
3. **Workplace vs. Storage Labels (DG)**: Differentiating between workplace labels and storage labels for dangerous goods (DG) can be challenging.

❑ **GHS Training**
1. **No Standard GHS Training Package**: There is no universally accepted training package, and training materials may need to be adapted to different languages and levels of understanding.
2. **Different Levels of Training**: Training programs may need to be tailored to different levels of expertise within the workforce.
3. **Training Packages with Examples and Practice**: Effective training requires practical examples and hands-on practice.
4. **GHS Classification Training/Guide**: Providing comprehensive training on GHS classification can be resource-intensive.
5. **Guidelines for Implementation**: Clear guidelines are needed to ensure consistent implementation of GHS across different sectors.

❑ **GHS vs. Dangerous Goods (DG)**
1. **Labeling Differences**: GHS labels and DG labels serve different purposes and have different requirements, which can lead to confusion
2. **Regulatory Differences**: GHS is focused on hazard communication, while DG regulations are concerned with the safe transport of hazardous materials

ARCP Initiative on GHS Alignment

Approach

*2017, a formation of **Subject Matter Experts network** represented by regulators and industry from all ASEAN Member States (AMS)*

Purpose

*To coordinate and **promote consistent implementation** of GHS regulations in the ASEAN region, **reduce divergence** of GHS implementation and **minimize trade barriers** from different classifications, SDS and labelling requirements.*
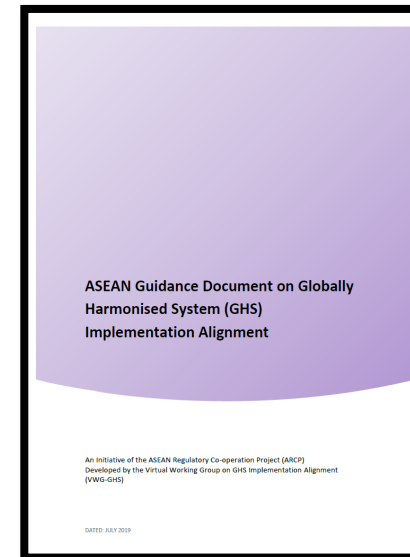
End Goal

*An established regulatory environment with **harmonised framework** of aligned requirements and processes, Encourages **free and open trade and investment** while protecting human health, safety, environment and security. Alignment to the directive of the **ASEAN Economic Community (AEC)**.*

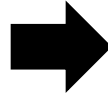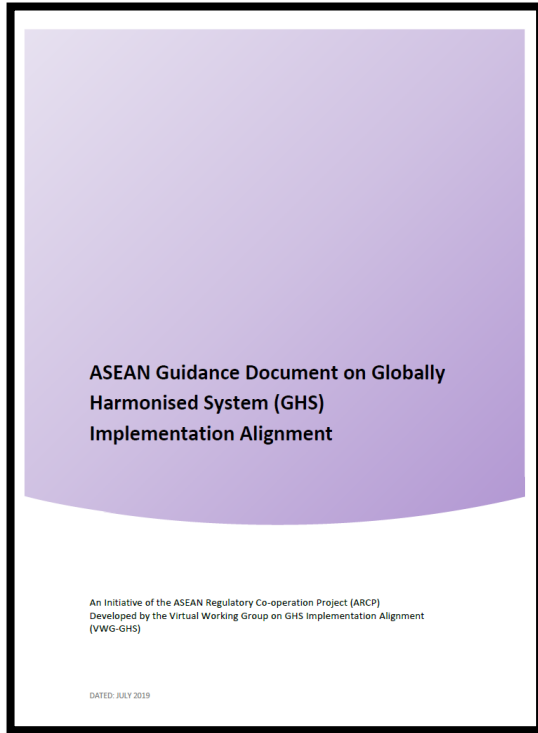## Guidance Document on GHS Implementation Alignment

Development of ASEAN Guidance document on GHS implementation alignment. **Launched in 2019.**
Recommends 7th Edition of the GHS Purple Book

*Development of reference working document **comparing GHS implementation** among AMS in overall landscape, classification, labelling as key sources of information*

ASEAN Guidance Document on Globally
Harmonised System (GHS)
Implementation Alignment

An Initiative of the ASEAN Regulatory Co-operation Project (ARCP)
Developed by the Virtual Working Group on GHS Implementation Alignment
(VWG-GHS)

DATED: JULY 2019

Key Accomplishments

ASEAN Guidance Document on Globally Harmonised System (GHS) Implementation Alignment

An Initiative of the ASEAN Regulatory Co-operation Project (ARCP)
Developed by the Virtual Working Group on GHS Implementation Alignment (VWG-GHS)

DATED: JULY 2019

Reduce divergence of GHS requirements and thus reduce trade barriers in AMS

Facilitate the maintenance of alignment efforts by AMS
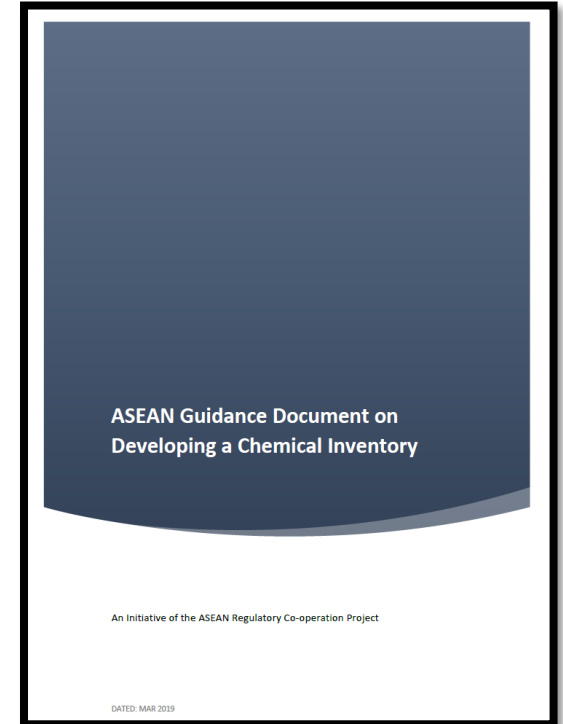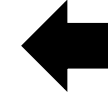
Promote alignment of GHS implementation in AMS

Co-operation and adoption of aligned requirements

Provision of guidance documents for AMS considering a CI implementation

Alignment approach in CI implementation to minimize technical barrier to trade

Building a baseline data set for future management of chemicals

Building industry knowledge and competency

ASEAN Guidance Document on Developing a Chemical Inventory

An Initiative of the ASEAN Regulatory Co-operation Project

DATED: MAR 2019

Thank you for your attention

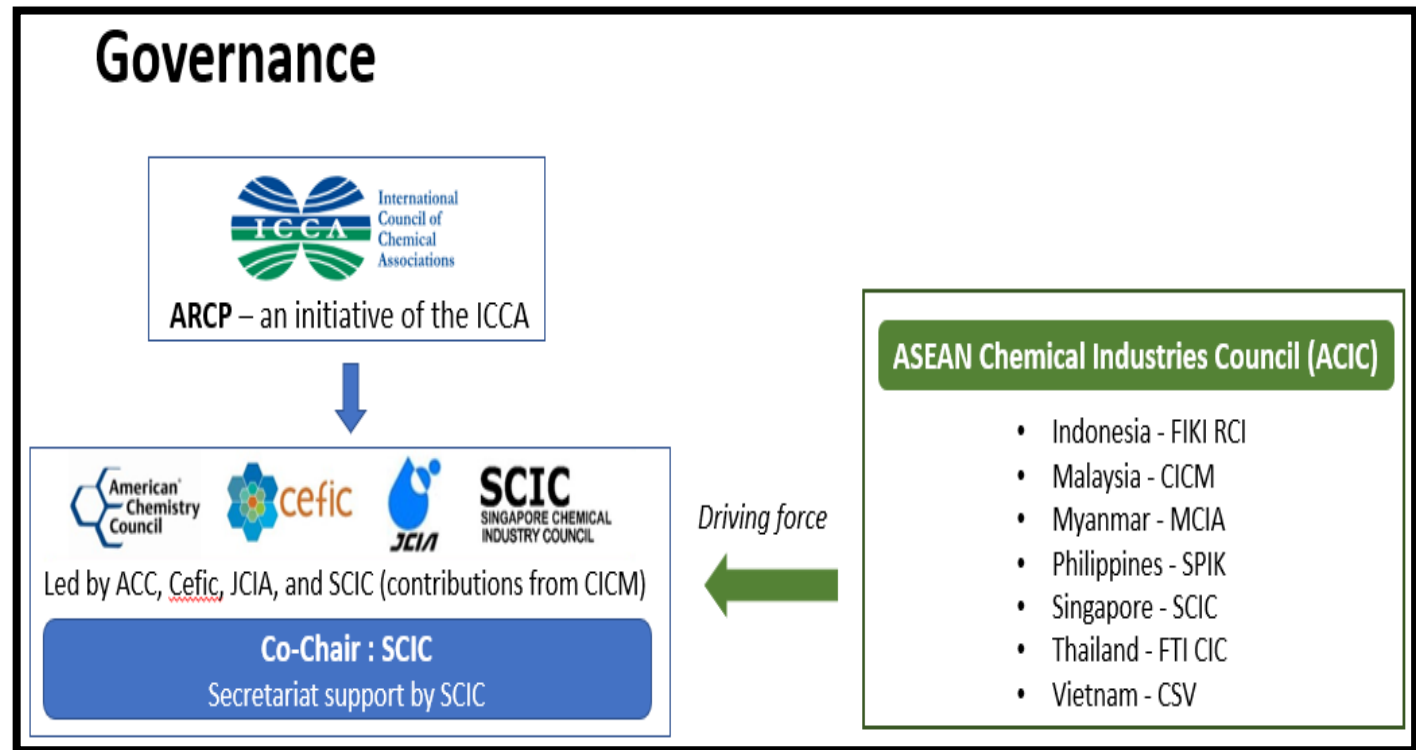*Cissie Yeung*
Cissie.yeung@shell.com

About ARCP

An initiative of the International Council of Chemical Associations Global Regulatory Cooperation Task Force (ICCA – GRC TF)
Led by the American Chemistry Council (ACC), European Chemical Industry Council (Cefic), Japan Chemical Industry Association (JCIA), and Singapore Chemical Industry Council (SCIC) in a joint-effort to advance chemical regulatory cooperation in ASEAN

Objectives

- ✓ Address non-tariff barriers due to divergence of chemical management regulations
- ✓ Encourage regulatory cooperation and convergence
- ✓ Apply global principles on sound management of chemicals
- ✓ Support ASEAN Economic Community (AEC), e.g., MPAC 2025

- Based on global principles for regulatory cooperation
- Aligned to the directive of the ASEAN Economic Community (AEC)
- Promotes the use of good regulatory practices
- Helps to establish regulatory environments that encourage free and open trade and investment while protecting human health, safety, environment and security.

Governance

ARCP – an initiative of the ICCA

Led by ACC, Cefic, JCIA, and SCIC (contributions from CICM)

Co-Chair : SCIC
Secretariat support by SCIC

Driving force

ASEAN Chemical Industries Council (ACIC)

- Indonesia - FIKI RCI
- Malaysia - CICM
- Myanmar - MCIA
- Philippines - SPIK
- Singapore - SCIC
- Thailand - FTI CIC
- Vietnam - CSV

Internal

# Regional cooperation: an opportunity to better manage chemicals

- Promote in-region dialogue among regulators and industry
- Enhance health and safety for the public, workplace and environment
- Promote health and safety culture in the region
- Resource efficiency and knowledge sharing
- Reduce technical barriers to trade

ARCP

Key Principles

- **Abiding by ASEAN Guidelines on Good Regulatory Practices**
  - Science and risk-based regulations
  - Fit for purpose, achievable objectives and suitable complexity
  - Step-wise approach
- **Effective use of scarce resources**
  - Leverage other regulatory systems and assessments
  - Capacity building to strengthen chemical management
- **Create efficiencies while respecting national sovereignty**
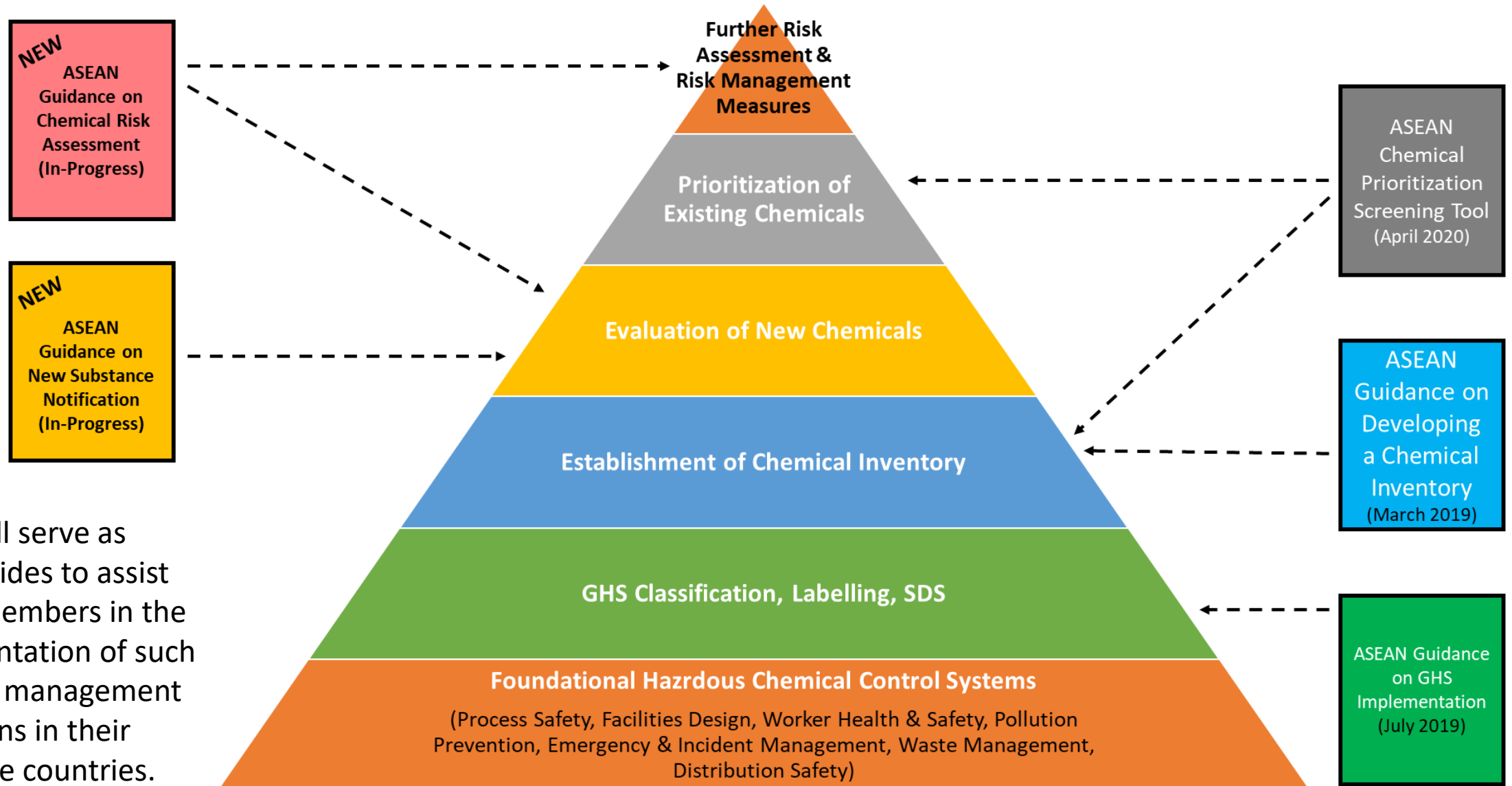
ARCP

Initiatives of ARCP
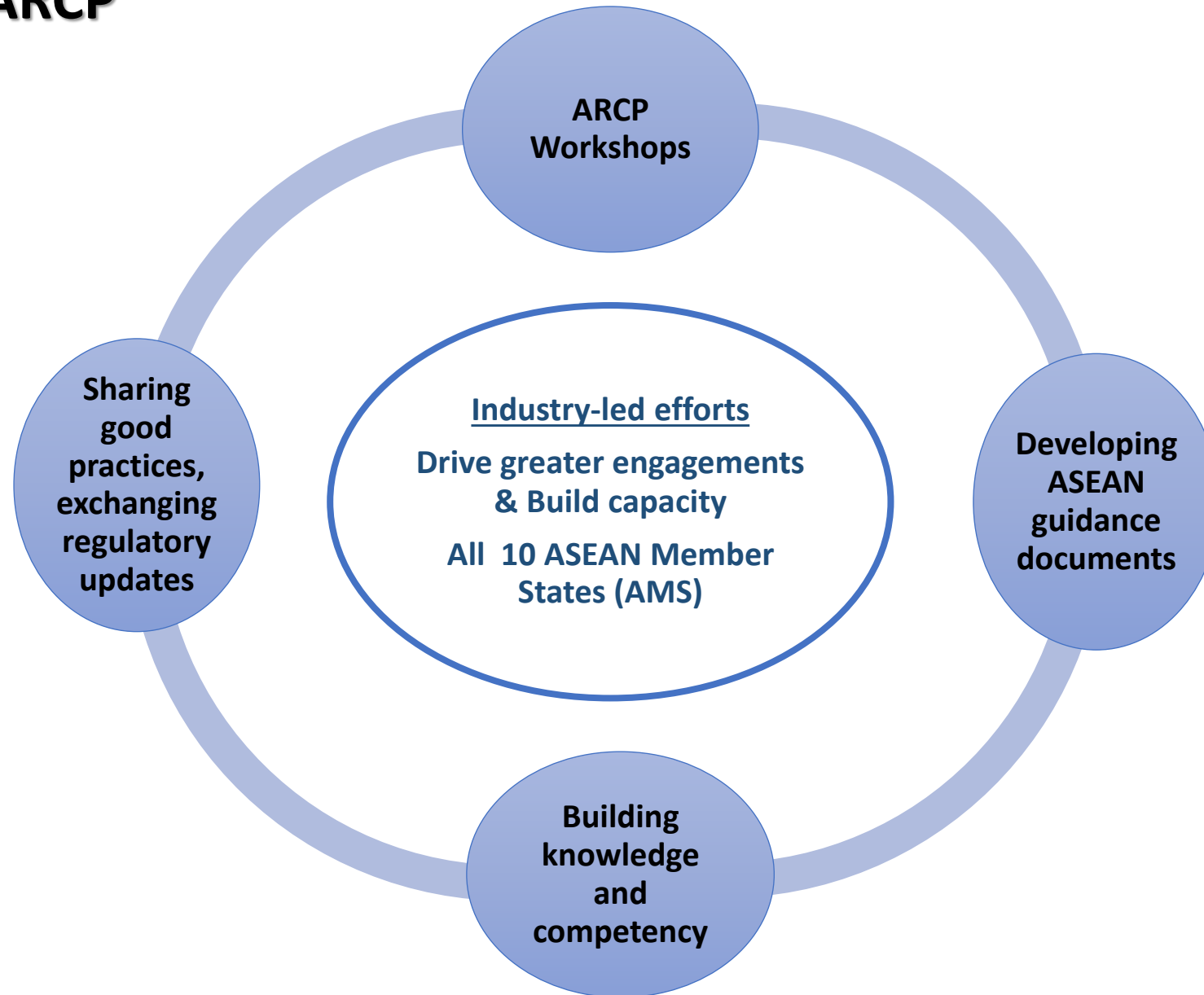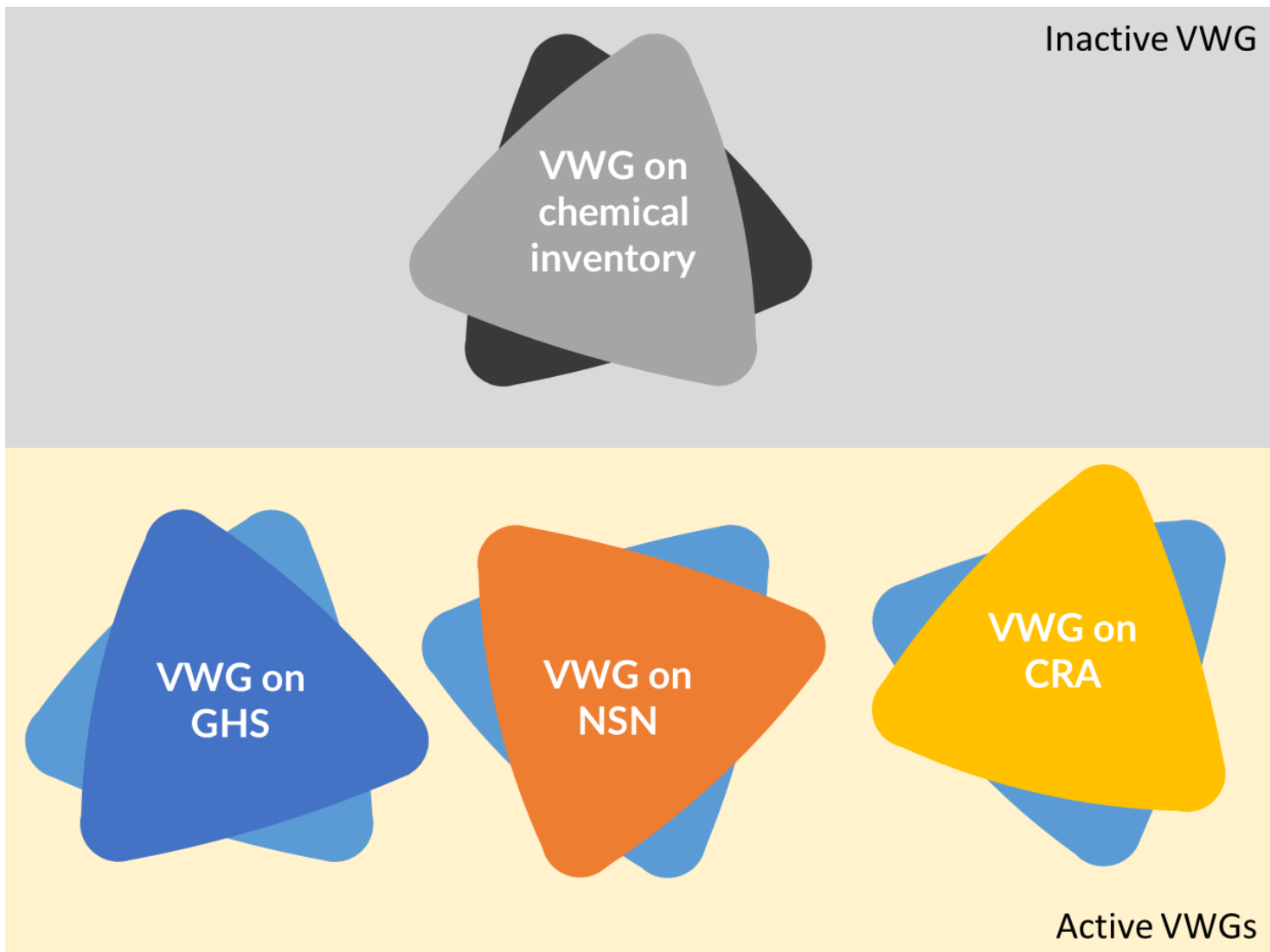
ARCP Virtual Workgroups

Formation of two new ARCP Virtual Workgroups in 2021

Support the continued efforts of ARCP in promoting regulatory alignment in the ASEAN region during the implementation of the chemical management regulations:

√   ARCP Virtual Workgroup on New Substances Notification

√   ARCP Experts Virtual Workgroup on Product Risk Assessment

Progression in Sound Management of Chemicals

NEW
ASEAN Guidance on Chemical Risk Assessment (In-Progress)

NEW
ASEAN Guidance on New Substance Notification (In-Progress)

These will serve as useful guides to assist ASEAN members in the implementation of such chemical management regulations in their respective countries.

Further Risk Assessment & Risk Management Measures

Prioritization of Existing Chemicals

Evaluation of New Chemicals

Establishment of Chemical Inventory

GHS Classification, Labelling, SDS

Foundational Hazrdous Chemical Control Systems

(Process Safety, Facilities Design, Worker Health & Safety, Pollution Prevention, Emergency & Incident Management, Waste Management, Distribution Safety)

ASEAN Chemical Prioritization Screening Tool (April 2020)

ASEAN Guidance on Developing a Chemical Inventory (March 2019)

ASEAN Guidance on GHS Implementation (July 2019)