

GHS Implementation Experiences and lessons learned

8 July 2021

1. GHS background and introduction

Classification, labelling and safety data sheets (SDS) provide the fundamentals for the sound management of chemicals and waste; maximising the benefits of chemicals and enhancing the protection of human health and the environment by providing an internationally comprehensible system for hazard communication. Following a decade of development triggered at the Rio Summit in 1992, the GHS was adopted in 2001 as a ground-breaking, voluntary international instrument to support the sound management of chemicals. In 2002, Heads of State and Government encouraged countries to implement the GHS with a view to having the system fully operational by 2008.

While a number of countries have implemented the GHS, the Global Chemicals Outlook-II (GCO-II, UNEP, 2019) indicates that the majority of countries have not yet done so. While many of the countries producing a large proportion of chemicals are implementing the system, those that do not include a significant number of developing countries, including countries with economies in transition with growing chemicals industries and levels of uses (and implementation of the GHS may enhance trade and economic growth). Countries in Africa, the Middle East, Latin America and South Asia are of particular note as not implementing the system. Given a range of identified gaps, including for GHS implementation, GCO-II states that, "business as usual is not an option" and that urgent and ambitious action is essential by all stakeholders.

The Global Partnership to Implement the GHS, with the ILO, OECD and UNITAR as co-leads, working with a coalition of committed stakeholders from Governments, IGOs, the private sector, NGOs, trade unions and academia, developed a document seeking to initiate a scaling-up of commitment for implementation of the GHS. One of the priority opportunities identified in that process was the identification of lessons learned and good practices from GHS activities and capacity development projects to identify key determinants which fostered successful GHS implementation, as well as factors impeding success.

2. Lessons learned - background

In order to support interventions to increase the number of countries implementing the system, the Global Partnership to Implement the GHS agreed (in its teleconference of 15 May 2020) to collect lessons-learned, case studies and useful tools for GHS implementation to support future capacity development.



3. Methodology

Input regarding lessons learned with GHS implementation was gathered from a broad range of stakeholders representing different groups (including regulators/governments, UN agencies, regional organisations, private sector companies and associations, and civil society, such as workers' representatives, academia, and occupational health and safety experts) and all UN regions. An additional consideration was to solicit input from countries/jurisdictions with varying experiences; those with several years', those with more recent or limited implementation experience, and those not yet implementing the GHS but with the intention to do so.

Information was collected across the eight issue areas listed below in a number of different ways:

- written input to a questionnaire (see annex);
- interviews (using similar questions as found in the questionnaire); and
- existing studies and reports.

The framework for collecting lessons learned with GHS implementation was the following:

- 1) Preparatory steps
- 2) Establishing a GHS-based policy and/or legal framework
- 3) Implementing activities
- 4) Regional and international links
- 5) Trading issues and considerations
- 6) Emergency Response
- 7) Monitoring, evaluation and enforcement
- 8) Other lessons

In the preparation phase and while collecting the information, it was noted that "lessons" can include:

- best/good practices or useful things that can be built upon, expanded, or replicated
- things that were not done but should have been done
- things that did not work well and what should have been done differently
- barriers (and how to overcome them) in relation to making progress with GHS implementation
- any other lessons identified

In addition, where possible and appropriate, it was asked if a corresponding "recommendation" could be made regarding the lesson(s) in order to be of relevance for the future or for those early on in the implementation process.

Please see Annex 1 for more detail on the methodology (including list of persons/organizations providing input, reports consulted, and copy of questionnaire used).¹

¹ In addition, a webinar was held in Latin America in late 2020 at which experience and lessons with GHS were also discussed.



4. Lessons learned, recommendations and opportunities

1) Preparatory Steps

Lessons in this section included information about, for example, national committees, gaps, existing capacities, existing policies, legal frameworks, prioritisations, awareness of decision makers, capacity development workshops.

Lessons/observations

GHS implementation is a multi-year and on-going process, therefore long-term commitment is crucial, and resources will be required.

Intentions to implement the GHS should be given as early as possible and as clearly/publicly as possible.

Benefits from implementing the GHS should be made clear and a consensus developed among stakeholders that it is important to do so (and also to highlight drawbacks from <u>not</u> implementing the GHS).

Thorough knowledge of existing, related laws/regulations/requirements in a given jurisdiction is needed and understanding of how GHS will affect them.

Technical expertise about the GHS is needed (or needs to be developed) for all relevant stakeholders (regulators, including lawyers, industry, and civil society) and sectors. If the expertise does not already exist, education and training is needed prior to implementation (see also sub-section 3).

Support from senior/top level representatives from the public and private sectors is key to being able to effectively start the implementation process.

A national network of relevant and knowledgeable stakeholders across affected sectors is needed. This should extend regionally and internationally so as not to work in "isolation". E.g. consider having "GHS ambassadors" to promote dialogue.

An initial understanding of the roles and responsibilities of each ministry and stakeholder group is important ("who needs to do what, who is responsible, and why"). Recommendations for possible action

- Identify key stakeholders in government (all relevant ministries and agencies), civil society, labour organizations, and industry (including producers and downstream users, and any associations).
- Form a national GHS coordinating committee (or create a GHS-focused committee within a larger relevant national management committee, if one exists) including the above stakeholders, along with any necessary subcommittees (e.g. sectoral working groups for industrial workplaces, agriculture, transport and consumer products; stakeholder subcommittees; or cross-sectoral working groups) with a mandate and resources to do what is required (and continue to function over time).



- Assess existing capacity for GHS implementation (across all sectors and stakeholder groups), including in legislation (or this can be considered as part of topic 2, below).
- Identify potential gaps related to GHS implementation (across all sectors and stakeholder groups), including in legislation (or this can be considered as part of topic 2).
- Organise initial awareness-raising sessions to engage different stakeholder groups (where deemed necessary)
- > Understand national, regional, and international policy prioritisations of the GHS.

2) Establishing a GHS-based policy and or/legal framework

Lessons in this section included information about, for example, policy and legal analysis, development of legislation options, consultation, drafting and adopting legislation.

Lessons/observations

Impact assessments – which can support development of a policy or legal framework - are a very valuable tool but can become lengthy and expensive (depending on how far downstream the assessment goes).

Developing/adapting a legal framework for the GHS is complex and requires expertise, resources, and dedication. The framework developed should be as consistent as possible with the GHS guiding principles and adhere to the building block guidance. The level of protection should not be reduced.² Consideration should also be given to the GHS implementation schemes of major trading partners.

Different approaches to legal adoption of the GHS exist in different jurisdictions³. Whatever the system in place, consultation and buy-in of all relevant sectors and stakeholders is crucial in establishing the new or amended legislation.

Lack of coordination between ministries and with stakeholders can result in contradictions and there is a need to understand how GHS interfaces with other related approaches (e.g. transport).

Some resistance to change is likely/normal and should be expected; this can be addressed (at least partially) by clear, consistent, and frequent information, communication, and dialogue.

Recommendations for possible action

Undertake a policy and legal analysis of the existing regulatory and administrative frameworks related to classification/labelling of chemicals and agrochemicals, transport and occupational safety and health, and hazard communication (and how they compare to the GHS). Based on this analysis, decisions can be taken on implementation options such as

² "the level of protection offered to workers, consumers, the general public and the environment should not be reduced as a result of harmonizing the classification and labelling systems" Globally Harmonized System of Classification and Labelling of Chemicals (GHS) Eighth revised edition, UN, 2019

³ For example, in some cases, a consensus proposal is needed first and in other cases regulators make a first draft proposal (after some initial consultation), then provide a period for comments and input after which the comments are addressed and the proposal finalized.



building block selection, transition periods, updating measures (e.g. how will the national GHS system be revised, how often, and on what basis), threshold limits for some hazard classifications, and confidential business information considerations.

- Consider an impact assessment or cost-benefit analysis (based on national circumstances) to showcase the value of implementing the GHS (including health and environment benefits, benefits to trade, improved "right-to-know") as well as barriers that could result if GHS is not implemented. Examples from other countries/regions include: Australia, Canada, South Africa, Switzerland, the United States of America, and the European Union.
- Develop and assess options for development of GHS-based legislation, regulations, policies or standards (including monitoring, enforcement, and review). Consideration should be given to:
 - integrating the GHS into an overarching regulatory framework or having a standalone legal approach
 - ensuring coordination of activities on GHS implementation with other updates to national chemicals, labour, health and environment-related legislation (if any)
 - $\circ \quad$ clarity of the roles and responsibilities of the various stakeholders
 - \circ provision for and length of transition periods (i.e. implementation in stages)
 - how the export and import of chemicals and products (in addition to those domestically produced) will be addressed (by reducing the need to comply with multiple regulations regarding hazard classification and subsequent labelling).
- Specific but practical timeframes and milestones for legal adoption and subsequent implementation should be established and clearly communicated.
- Once the legal framework to be used or adapted is agreed, initiate a process (including stakeholder consultation) to draft, adopt, and publish the new legal measures (which should be publicly available and accessible⁴).
- In parallel with the legal GHS adoption process, other supporting activities such as preparatory awareness raising (focusing on less technical elements and using less technical language) for target audiences and stakeholders who will need to implement, use, or be aware of the new national GHS-based legal framework could also be undertaken (see also next section).

3) Implementing activities

Lessons in this section included information about, for example, training (at the workplace level and others), engaging private sector partners and implementers of the system, and awareness raising.

⁴ International notification of legal adoption can be made at: <u>https://unece.org/transportdangerous-goods/ghs-implementation-information-submission-form</u>



Lessons/observations

Guidance materials needed to assist understanding and compliance with the new GHS-based system should be developed early on (in the best-case scenario they should be ready for when the new system takes effect rather than afterwards).

On-going education and training of all relevant stakeholders, and workers in particular, is crucial to effective GHS implementation. Training needs of different audiences should be identified in advance.

Specific technical training in how to classify according to the GHS (especially for mixtures) is needed for the industry. SMEs may require particular training to help to use the system – larger and multinational companies from similar industries, and associations, could assist in this.

A variety of training methods are needed, such as written materials, workshops, online training ("virtual classrooms") and webinars, and training of trainers. Umbrella groups (such as industry associations and trade unions) can be a helpful resource for assistance. Resource implications need to be considered and training targets and milestones developed. Countries and organisations with GHS implementation experience can assist those just starting out.

Consider establishing or using existing national chemicals "help desks" for support, answering questions, and providing guidance or information about GHS implementation.

Updating of labels can be complex and this should be anticipated. Re-training or updated training should be considered for when the system is revised, including a sustainable mechanism for training over time (for refreshing concepts, updating information, and reaching out to new trainees).

Wide-spread awareness and communication campaigns are useful to educate the general public about new labels and meaning of symbols; this can include education in schools and colleges.

Share experience and best practices with training and awareness raising efforts regionally and internationally.

Recommendations for possible action

- Consider how to reach the widest audiences to inform them of the importance of the national GHS-based system and its benefits for human health, workers, the environment, and economic development (e.g. campaigns informing on the meaning of the new GHS hazard symbols, school campaigns, development of posters, TV ads, websites, social media) for all sectors and stakeholder groups.
- Government, UN agencies, industry, labour organizations and civil society should, when appropriate, work together on GHS awareness raising across all sectors.
- Different formats and approaches for training (and re-training) should be considered: workshops and seminars, hands-on/practitioner training, virtual training courses and webinars, embedding GHS training in existing related (and recurring) training platforms and activities, establishing recognized GHS training centres, on-line support tools to help classify and label, study tours/experience sharing/sharing of good practices, participation in international training programmes, user guides.



In addition to awareness raising activities or campaigns, consideration should be given to what on-going communication and outreach activities may be needed. This could include, for example, development of guidance, guidelines, or technical standards regarding how to apply the national GHS-based system (e.g. classification guidance for specific stakeholders, sectors, or industries; guidance on label and SDS preparation); sharing of GHS classification results (and understanding of widely available chemical safety information and data); regular implementation or progress reports; regular roundtable (or other format) dialogue sessions or working groups; impact studies.

4) Regional and international links

Lessons/observations

Differences between systems in countries/regions need to be understood and, if possible, clear guidance developed to assist managing those differences (where feasible, harmonizing as far as possible can be beneficial).

There is a need to improve alignment between national, regional, and international approaches.

International and regional cooperation projects can play a vital role in delivering and enhancing knowledge.

Having the GHS (and UNRTDG and manual of tests and criteria) translated into national languages is important.

The study by Persson et al (2017) concluded that:

The opportunities that lie in regional collaboration and coordination around GHS implementation has been highlighted before. Regional trade blocs and organisations could play a key role here in jointly implementing the GHS or in supporting national implementation processes. Countries within a trade bloc or organisation with more capacity can assist other member states that are less resourced for the implementation.

Recommendations for possible action

- Consider how on-going and pro-active dialogue and coordination with regional partners and organizations (*e.g.* via a "regional GHS forum") can benefit a regionally harmonised approach to GHS implementation and consider if GHS can be integrated into existing workplans and programmes of regional organizations. Develop a regional network of experts.
- Cooperate/benchmark with neighbouring countries to pool resources, share information about implementation status and plans, exchange technical competencies, learn best practices, discuss challenges and solutions, and aim to prevent or reduce any unnecessary differences in approaches and timelines which can help to avoid trade barriers with the main regional trading partners, and promote safety and protection.



- In the absence of a single global list of classified chemicals (or until one may be developed), an appropriate entity should consider compiling all existing lists of GHS-classified chemicals (held by countries or industries) and explain how they were developed and any causes for divergence.
- During the GHS adoption and implementation process, countries may wish to communicate with key multilateral groups such as the UN Sub-Committee of Experts on the GHS⁵, the WTO to provide a notification on new trading conditions, and UNITAR, ILO and UNECE (as custodians of the IOMC indicator for reporting on GHS legislation), and SAICM in order to inform the international community of progress on GHS, to share experiences, get feedback and request further resources to support implementation.
- Consider establishing at the international level (whether via the GHS Sub-committee or another mechanism) a forum or working group to allow for dedicated discussion and cooperation to facilitate harmonized implementation of the GHS.
- Consider how GHS implementation may link to national implementation of other international agreements, such as the Basel, Minamata, Rotterdam, and Stockholm Conventions, ILO Convention 170 (and other relevant ILO conventions), the International Health Regulations, the FAO/WHO International Code of Conduct on Pesticide Management, or contribute to national achievement of the SDGs.

5) Trading issues and considerations

Lessons/observations

A number of technical challenges/issues exist that can result in a lack of harmonization, barriers to trade and added costs, and cause confusion for workers and consumers:

- using different versions (revised editions) of the GHS
- o different use of building blocks
- o different implementation timeframes
- different approaches to the use of confidential business information
- o different classification results using GHS criteria resulting in different elements of labels or SDS
- o inconsistent, incomplete, and contradictory information provided in safety data sheets.

<u>Recommendations for possible action</u> (see also recommendations under section 4 above)

In order to increase a globally harmonized approach to GHS implementation, encourage countries (to the degree possible) to converge to adopt the same version of the GHS using similar transition and implementation timeframes.

⁵ This could include participation in the GHS Sub-committee as an observer or applying to become a member. Once a member, countries may submit informal documents to the Sub-committee or provide informational interventions to make others aware of the status of GHS implementation.



- > Promote inclusion of the GHS in regional and international trade agreements.
- Consider possible impacts on transboundary transport (particularly among regional/neighbouring countries) as some or all countries initiate implementation of the GHS and any possible steps that may be needed to minimise disruption.

6) Emergency Response

Lessons/observations

GHS implementation can help to provide more consistent hazard information to chemical users, as well as those required to handle hazardous chemicals in a process or emergency.

Governments should provide clarity on who is responsible for managing emergencies and industry should support with high quality SDS (and may be able to undertake training of both companies and governments in the preparation of and use of SDS). Poisons centres with access to and understanding of safety data sheets and how they are used is also essential.

Design and implement a regular training plan for emergency responders.

Provide a direct communication channel among emergency responders, poisons centres, and GHS experts to provide advice. Refresher training needs to be conducted for responders to enable better understanding of any new amendment or change to GHS-based labels and safety data sheets.

Having an emergency phone number in section 1 of an SDS is important; however, while large chemical suppliers may have a 24/7 emergency response system to handle emergencies with their products, smaller companies may not have such an emergency system. If it is available, it should be specified on the SDS. A statement to contact the local poisons centre should also appear if applicable.

Recommendations for possible action

- Consider how to involve the needs and expertise of the emergency response sector and those involved in responding to chemical emergencies such as spills, leaks or explosions⁶. In the case of an industrial accident, for example, workers and emergency responders need to know what mitigation and control measures are appropriate. In such a situation, they may require information that can be seen from afar. They may also then require expert assistance with regards to how to treat a particular chemical emergency, such as a spill in a given environment (e.g. information on factory design can be used to help contain a chemical spill in a particular facility).
- Fire fighters and those first at the scene of a transport accident also need information that can be distinguished and interpreted at a distance. Such personnel are highly trained in the use of graphical and coded information.⁷ Labels are required to provide immediate summary

 ⁶ International Health Regulations: Preparedness and Emergency response is a strategic area as part of the core capacities for chemical events <u>https://apps.who.int/iris/rest/bitstreams/1060499/retrieve</u>
⁷ For example, as found in the USA/Canada/Mexico "Emergency Response Guidebooks".



information regarding the chemical at hand, as well as detailed information found in an SDS regarding how a chemical should be handled.

For agricultural or consumer poisoning incidents, the information needs of medical personnel responsible for treating victims may differ from those of fire fighters. In this case, the role of poisons control centres and others with toxicological expertise is important.

7) Monitoring, evaluation and enforcement

Lessons/observations

Consider developing plans for monitoring, evaluation and enforcement during early planning for GHS implementation (even if it is some time before they are put to use).

Progress can be demonstrated with well thought out and clear, understandable targets and indicators. Involvement of stakeholders and discussion with other countries should help develop appropriate targets and indicators.

Involve customs from the beginning and develop a training programme for inspectors.

A report regarding monitoring and compliance can be published every year, keeping in mind the need to evaluate current standards or requirements against requirements in new revisions of the GHS.

According to Choo Ta (2021), no global consensus exists regarding the definition of "GHS implementation" and that the criteria and indicators for GHS implementation are yet to be established. He therefore recommends that appropriate criteria and indicators should be established to monitor the global GHS implementation status (although no proposals for what would constitute "appropriate" criteria and indicators are made⁸).

Related to this, Persson et al (2017) proposed a number of possible policy options to enhance national GHS implementation related both to motivation to implement and capacity to do so:

	Possible Options	Actors
	Increased regional collaboration on GHS implementation	Regional trade blocs and other regional organisations
Motivation	Engaging new actors with interest in occupational safety	ILO, trade unions, private sector actors
	Increased efforts on inclusiveness of the GHS Sub-committee	UN ECOSOC member countries
Capacity	Supporting improved regulatory capacity	All countries, donors

⁸ Some initial suggestions, however, may be found in Peter J. Peterson et al, "Indicators as a tool for the evaluation of effective national implementation of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS)", *Journal of Environmental Management*, Volume 91, Issue 5, 2010.



General capacity building, taking on board lessons learnt	SAICM process, GEF, Governments (donor and recipient countries)
Efforts in overall 2030 Agenda realization	Countries and other stakeholders in the 2030 Agenda process

Frequent enforcement campaigns may enhance the level of compliance since companies are more responsive when they expect regular control by inspectors. This is however subject to enforcement capacity.

GHS enforcement varies among countries. Some countries have fines/penalties, some work with companies to achieve compliance, and others have no enforcement.

Some countries carry out GHS inspections at customs and do not allow entry without the GHS label for the importing country, while others allow chemicals to arrive with the GHS label of the exporting country before proceeding to re-labeling prior to further distribution.

Recommendations for possible action

- Constant communication between all stakeholders who have responsibility for GHS implementation and with legislators and other policy makers (e.g. via on-going briefing sessions) is necessary in order to maintain essential support and to ensure effective and efficient GHS implementation.
- Continue to hold regular meetings of the national GHS committee (or equivalent) and relevant stakeholders.
- Monitoring, enforcement, and feedback mechanisms should be built-in to the national GHS framework and need continued support (e.g. inspectorates, customs, health and safety reporting, compliance regimes).
- Establish and use a consultative system to keep national GHS provisions, including in legislation, updated.

8) Other lessons

The study by Persson et al (2017) concluded that "sustained capacity building and partnering with donor countries can result in countries with low capacity to implement GHS". This may be even more the case since "it is possible that a general commitment to ratifying conventions and participating in international processes is less resource demanding than an actual GHS implementation, and that this can be a reason for GHS losing the competition against other priorities in the actual budget and planning processes in countries, in spite of a general commitment to sound chemicals management at the political level".

Experience from organizations that have assisted countries with GHS implementation (*e.g.* UNITAR, ILO) further suggests that working over several phases (rather than as a "one-off" project or training workshop), including multiple components (such as legal, technical, and procedural support and



training), and working concurrently with a number of countries in a region or sub-region (to encourage dialogue with regional trading partners and share experiences and approaches) is a more effective and efficient approach to providing support for GHS implementation.

Annex 1

Names of stakeholders consulted

- 1. Sam Adu-Kumi (Environmental Protection Agency, Ghana)
- 2. Camila Arruda Boechat (Ministry of Environment, Brazil)
- 3. Oswaldo Celedon (National Association of the Chemical Industry (ANIQ), Mexico)
- 4. Jacques Cerf (GHS/WHMIS Consultant for the Chemistry Industry Association of Canada (CIAC))
- 5. Peter Dawson (Environmental Protection Authority, New Zealand)
- 6. Edisiene de Souza Correia (Ministry of Environment, Brazil)
- 7. Rosa Garcia Couto (UNECE (secretariat of the Sub-committee of experts on the GHS))
- 8. Raleigh Davis (American Chemistry Council (ACC), USA)
- 9. Bojana Dordevic (Ministry of Environmental Protection, Republic of Serbia)
- 10. Natalia Druzhinina (CIS Centre, Russia)
- 11. Richard Garnett (CropLife International)
- 12. Abdullah Abu Haidar (SABIC, Saudi Arabia)
- 13. Kim Headrick (Health Canada (retired), former Chair Sub-committee of experts on the GHS)
- 14. Katleen Hendrix (European Commission, (DG for Internal Market, Industry, Entrepreneurship and SMEs)
- 15. Jenny Holmqvist (European Chemicals Agency (ECHA))
- 16. Libin Huo (AICM (Association of International Chemical Manufacturers), China)
- 17. Uta Jensen-Korte (European Commission (DG Enterprise) (retired))
- 18. Hiroshi Jonai (National Institute Occupational Safety and Health, Japan)
- 19. Ari Karjalainen (European Chemicals Agency (ECHA))
- 20. Otto Linher (European Commission (DG for Internal Market, Industry, Entrepreneurship and SMEs))
- 21. Elize Lourens (National Department of Employment and Labour, South Africa)
- 22. Alejandro Machado (Ministry of Labor, Argentina)

- 23. Cristian Enrique Brito Martinez (Ministry of the Environment, Chile)
- 24. Fabián Benzo Moreira (UNITAR GHS Senior Expert; international GHS consultant)
- 25. Pablo Olivares (Sociedad Química y Minera (SQM), Chile)
- 26. Hanna-Andrea Rother (University of Cape Town, South Africa)
- 27. Maureen Ruskin (US OSHA, current Chair Sub-committee of experts on the GHS)
- 28. Xiomara Jiménez Soto (Ministry of Health, Costa Rica)
- 29. Michele Sullivan (American Chemistry Council (ACC), USA)
- 30. Lawrence Thompson (Expert consultant for the Caribbean Region)
- 31. Dorothy Wigmore (Occupational health specialist, self-employed, Canada)
- 32. Cissie Yeung (Singapore Chemical Industry Council / Shell, Singapore)
- 33. Hazlina Yon (Department of Occupational Safety and Health (DOSH), Malaysia)

Written information consulted

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ICCA, Synthesis of GHS Cost Benefit Papers, 2019

Linn Persson et al., "The Globally Harmonized System of Classification and Labelling of Chemicals - Explaining the Legal Implementation Gap", *Sustainability*, Nov. 2017.

Myra L. Karstadt, "The road to GHS: worker right-to-know in the 21st Century", *International Journal of Occupational and Environmental Health*, vol. 18, no. 1 (2012).

Taller Sub-Regional de América del Sur sobre Comunicación de Peligros Químicos y Aplicación del SGA Para países Miembros del Mercosur y de la Comunidad Andina – reporte final , UNITAR/ILO, 2004.

UNITAR regional workshop reports, Annual Reports of the GHS Partnership.

University of Cape Town Chemicals Network discussion on GHS, 11 Dec 2020.

Copy of questionnaire used to gather input

n.b. input was sought in line with the below questionnaire, though not all stakeholders were expected to be in a position to answer all questions

GHS lessons learned, recommendations and opportunities

The lessons learned have been grouped according to 8 themes.

Lessons from governments, private sector companies and associations, labour unions, intergovernmental organisations and others are being sought.

"Lessons" can include:

- best/good practices or useful things that can be built upon, expanded, or replicated
- things that were not done but should have been done
- things that did not work well and what should have been done differently
- barriers (and how to overcome them) in relation to making progress with GHS implementation
- any other lessons identified.

In addition, for each lesson it will be asked if a corresponding "recommendation" can be made about it relevant for the future or for those early on in the implementation process.

PLEASE ANSWER THE FOLLOWING TO THE BEST OF YOUR KNOWLEDGE AND EXPERIENCE, AND PROVIDE A CORRESPONDING "RECOMMENDATION" IF POSSIBLE:

<u>Name</u>: <u>Organization</u>: <u>Country</u>:

- 1) Preparatory Steps (national committees, gaps, review of existing capacities, existing policies, legal frameworks, and prioritisations, awareness of decision makers, capacity development workshops)
 - > In preparing for GHS implementation, what lessons were learned?
- 2) Establishing a GHS-based policy and or/legal framework (policy and legal analysis, development of legislation options, consultation, drafting and adopting legislation)
 - In establishing or preparing for a GHS-based policy and/or legal framework or standard, what lessons were learned?

- 3) Implementing activities (training at the workplace level and others -, engaging private sector partners and implementers of the system, awareness raising)
 - In undertaking or preparing for GHS implementing activities, what lessons were learned?
- 4) Regional and international links
 - What lessons have been learned in relation to regional and international links regarding GHS implementation? (e.g. coordination with trading partners or with regional bodies, sharing international experiences, etc)
- 5) Trading issues and considerations
 - What lessons have been learned in relation to trade issues and considerations as regards implementing the GHS?
- 6) Emergency Response
 - What lessons have been learned in relation to GHS implementation and emergency response?
- 7) Monitoring, evaluation and enforcement
 - What lessons have been learned in relation to monitoring, evaluation, and enforcement of the GHS?
- 8) Other lessons
 - Have any other important lessons been learned in relation to implementing the GHS?