

The Globally
Harmonized System
of Classification and
Labelling of
Chemicals (GHS)

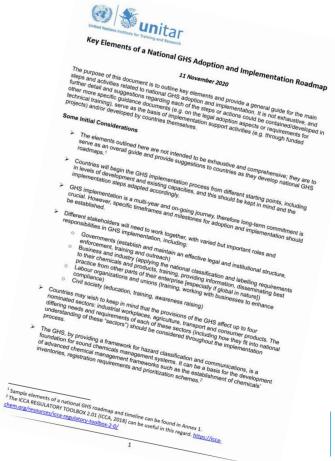
Developing a GHS Roadmap



Main guidance documents

https://unitar.org/sustainable-development-goals/planet/our-portfolio/globally-harmonized-system-classification-and-labelling-chemicals/global-partnership-implement-ghs







Main elements of developing a roadmap

- Identifying and engaging stakeholders
- Setting up a GHS/ using an existing coordination committee
- Situation analysis
- Gap analysis
- Legal analysis and developing a legal implementation framework
- Comprehensibility and awareness raising
- Sector-specific implementation plans



Identification and engagement of stakeholders in the GHS

GHS implementation is a **multi-year and on-going journey**, therefore **long-term commitment** is crucial.

However, specific timeframes and milestones for adoption and implementation should be established.

GHS implementation requires the engagement of all relevant sectors and actors in all parts of the GHS planning and implementation.





Identification and engagement of stakeholders in the GHS

Different stakeholders will need to work together, with varied but important roles and responsibilities in GHS implementation, including:

- Governments (establish and maintain an effective legal and institutional structure, enforcement, training and outreach)
- Business and industry (applying the national classification and labelling requirements to their chemicals and products, training, providing information, disseminating best practice from other parts of their enterprise [especially if global in nature])
- Labour organizations and unions (training, working with businesses to enhance compliance)
- Civil society (education, training, awareness raising)



National GHS Coordinating structure

Form a **national GHS coordinating committee** (or create **a GHS subcommittee** within a larger relevant national management committee, if one exists)

- 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).
- How can the GHS fit into the mandate of the National Directorate?



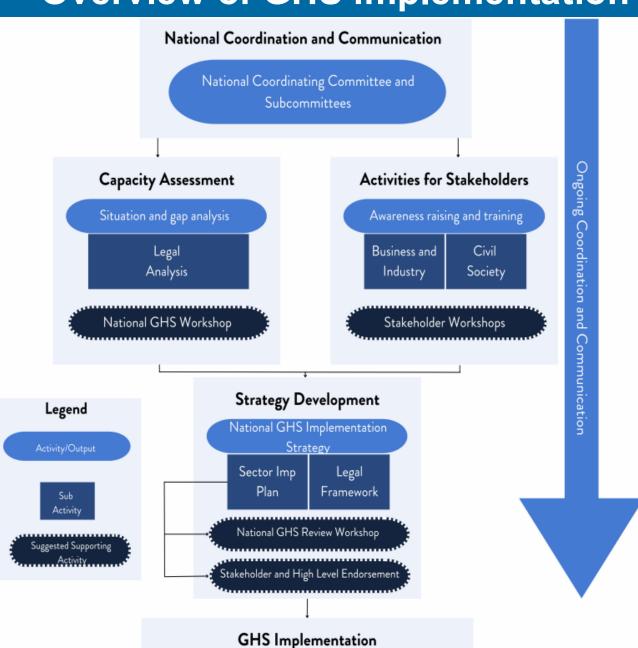


National GHS Coordinating structure





Overview of GHS implementation





Situation Analysis

❖This analysis is conducted to collect baseline information and document the existing national infrastructure and capacities for chemicals classification and hazard communication.

❖The situation analysis identifies and documents the existing national situation with regard to legislative infrastructures, institutional responsibilities and administrative capacities relevant to chemical hazard communication.

❖The guidance document Developing a National GHS Implementation Strategy provides questions to guide the development of the situation analysis (as well as gap analysis).

Situation analysis

Some useful baseline information may include:

- ❖National production of chemical substances and/or mixtures (types);
- Information related to import or export chemical substances and/or mixtures (which products and with what trading partners);
- ❖Current national levels of chemical production, import and export (as appropriate);
- National trends in chemicals use;
- ❖Groups (e.g., factory workers, farmers, transporters, consumers) exposed to chemical hazards;
- *Level of participation in the development of the GHS and/or in the work of the UN Subcommittee of Experts on the GHS (UNSCEHGS); and
- Sources of available information on chemical risk management, chemical hazard communication and the GHS (e.g. national and international approaches).



Considerations for situation analysis

- What government agencies and departments are responsible for chemicals management, worker safety, environment or any other sector relevant to GHS implementation?
- ❖Do customs authorities play a role in enforcement of the national system? If so, how and with what training?
- ❖How is training on chemical classification and hazard communication undertaken, if at all?
- Which government agencies are concerned with emergency preparedness and response and what are their relevant functions and activities?
- ❖ What is the structure and size of the chemical-related industries in the country (e.g., major multinationals, national industries, mostly SMEs)?
- What knowledge and capacities exist for preparing SDS and labels?
 Where are these capacities located and "who" is responsible?



Considerations for situation analysis

- What awareness raising and training activities or programmes are undertaken by companies who produce and market chemicals and those who use them?
- * What labour unions, public interest groups, consumer protection associations or other NGOs (e.g., representing women's and children's health) have (or may have) an interest in chemical hazard communication?
- ❖ What relevant activities are undertaken in the academic sector (e.g., research and training) or by the media (e.g., awareness raising)?
- ❖ Is division of responsibilities across government ministries ensured or are mandates overlapping within and across the four sectors?

Considerations for situation analysis

- ❖To what extent are chemical hazard communication tools used by business and industry already compatible with GHS provisions (e.g., SDS and label formats)?
- What additional awareness raising and training activities will be required by business and industry?
- What additional programmes could be initiated by civil society organizations (including the media) in order to promote effective GHS implementation?



Gap analysis

- Compares GHS requirements with existing legislative requirements
- Identifies GHS requirements not provided in the national regulatory system
- Identifies conflicts between the GHS and national requirements
- Determines potential implications of GHS implementation

Information should be collected and analysed by government, industry and civil society for each of the relevant sectors (e.g. industrial workplaces, agriculture, transport and consumer product chemicals).



Situation and Gap Analysis Report

- ❖The output from the situation and gap analysis should be a concise report, could be complemented by summary tables of the sectorspecific findings.
- ❖The information gathered could be used in the initial situation and gap analysis to provide a starting point for developing implementation plans.





Legal analysis and legal GHS implementation framework

A legal analysis provides an overview of the existing regulatory framework, and a context for policy decisions on implementation.

The analysis is conducted in two parts:

- 1. Looking at the current situation
- 2. Comparing it with what should be in place to implement the GHS



Factors to Consider: Legal

- If regulatory requirements exist, to what extent are relevant provisions compatible with the requirements of the GHS?
- Which regulatory adjustments need to be made to ensure compatibility?
- ❖ Are there any duplicative existing regulations that should be addressed?
- Do existing legal instruments provide a clear mandate and framework to ensure support for relevant government agencies to implement chemical hazard communication programs and the GHS?

Factors to Consider: Legal

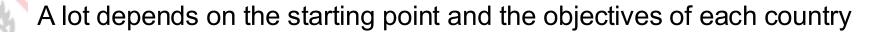
- ❖If a legal framework for sound chemical hazard classification and/or communication in a given sector is not in place, what specific reform measures need to be undertaken to ensure that national regulatory framework provides for comprehensive and effective implementation of the GHS?
- Which GHS sectors are not covered by the existing legislative framework?
- What are the deviations for hazard classification and communication between the existing system and the GHS requirements?
- What timeframe (including provision for transition periods) should be used in implementing new or amended regulations?

GHS legal implementation framework

Based on the outcomes of the legal analysis, countries may wish to focus their efforts on a GHS legal implementation framework.

There are a number of **options** for legal implementation of the GHS, such as:

- New law encompassing all GHS sectors
- New laws, regulations and standards by sector
- Amending existing laws (e.g. incorporating GHS elements by reference), regulations and standards
- Single consolidated Act
- Amend existing legislation to incorporate GHS elements
- Amend existing legislation to incorporate GHS elements by reference
- Amend standards with corresponding amendments to legislation (e.g., for compliance and enforcement)
- Consolidate and amend existing standards with corresponding amendments to legislation (e.g., for compliance and enforcement)



Engaging stakeholders in capacity building: Awareness raising

You may wish to consider **how to reach the widest audiences** to inform constituents about the GHS and its benefits to the country.

Awareness raising campaigns in other countries included:

- Sectoral awareness raising trainings,
- Development of brochures and posters,
- ❖TV spots on GHS,
- Organization of GHS awareness among schoolchildren,
- ❖Production from local theatre groups on GHS



Developing a National GHS Strategy/Roadmap (i)

The important following information should be included:

- ❖The target date for GHS implementation, given international and national factors (including possible transition periods)
- The setup or organogram of the National GHS Implementation
 Committee and relevant subcommittees
- Priority implementation issues





Developing a National GHS Strategy/Roadmap (ii)

The important following information should be included:

- *Activities needed to ensure GHS implementation by the target date
- ❖Necessity of and means for acquiring resources
- *Possible synergies with other international agreements and activities (e.g. Rotterdam and Stockholm Conventions, ILO Convention 170, GFC, HHPs)
- Description of cross-sectoral issues
- Role of stakeholders in raising awareness and training.





- Roles of stakeholders involved in GHS implementation in the sector
- Summary of the situation and gap analysis
- Legislative actions necessary for GHS implementation
- Details on cross-sectoral activities needed for GHS implementation
- Workplan for activities







National GHS Strategy/Roadmap endorsement

- Review and agree National GHS Roadmap
- Discuss next steps
- *High level endorsement and commitment to implement the GHS





Thank you for your attention

For more information, please contact UNITAR

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