

Key Elements of a National GHS Adoption and Implementation Roadmap

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The purpose of this document is to outline key elements and provide a general guide for the main steps and activities related to national GHS adoption and implementation. It is not exhaustive, and further detail and suggestions regarding each of the steps or actions could be contained/developed in other more specific guidance documents (e.g. on the legal adoption aspects or requirements for technical training), serve as the basis of implementation support activities (e.g. through funded projects) and/or developed by countries themselves.

Some Initial Considerations

- The elements outlined here are not intended to be exhaustive and comprehensive; they are to serve as an overall guide and provide suggestions to countries as they develop national GHS roadmaps.¹
- Countries will begin the GHS implementation process from different starting points, including in levels of development and existing capacities, and this should be kept in mind and the implementation steps adapted accordingly.
- 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.
- 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)
- Countries may wish to keep in mind that the provisions of the GHS affect up to four nominated sectors: industrial workplaces, agriculture, transport and consumer products. The differing needs and requirements of each of these sectors (including how they fit into national understanding of these “sectors”) should be considered throughout the implementation process.
- The GHS, by providing a framework for hazard classification and communications, is a foundation for sound chemicals management systems. It can be a basis for the development of advanced chemical management frameworks such as the establishment of chemicals’ inventories, registration requirements and prioritization schemes.²

¹ Sample elements of a national GHS roadmap and timeline can be found in Annex 1.

² The ICCA REGULATORY TOOLBOX 2.01 (ICCA, 2018) can be useful in this regard. <https://icca-chem.org/resources/icca-regulatory-toolbox-2-0/>

(1) Preparatory Steps

- Identify key stakeholders in government (all relevant ministries and organizations), civil society, labour organizations and industry (including producers and downstream users)
- Form a national GHS coordinating committee (or create a GHS subcommittee within a larger relevant national management committee³, 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).
- Assess existing capacity for GHS implementation (across all sectors and stakeholder groups)⁴
- Identify gaps related to GHS implementation (across all sectors and stakeholder groups)
- Organise initial awareness-raising sessions to engage different stakeholder groups (where deemed necessary)
- Understand national, regional and/or international policy prioritisations of the GHS
 - This could include regional economic bodies (e.g. the Southern African Development Community, the Andean Community and the Asia-Pacific Economic Cooperation) promoting implementation, international agreements and frameworks such as ILO Convention 170, integration in the International Code of Conduct on Pesticide Management (Guidelines on Highly Hazardous Pesticides), and the Sound Management of chemicals and Waste Beyond 2020, and international funding mechanisms, such as the Special Programme.

(2) Adopt a national GHS-based legal and/or policy framework

- Undertake a policy and legal analysis of the existing regulatory and administrative frameworks related to classification/labelling of chemicals and hazard communication.
 - An important consideration will be that of which entity will serve as the Competent Authority (CA), as a CA will have a vital and wide-ranging role in effective implementation
 - Based on the above analysis, decisions can be taken on implementation options such as building block selection, transition periods, updating measures, and threshold limits for some hazard classifications.
- Develop and assess options for development of GHS-based legislation, regulations, policies or standards (including monitoring, enforcement, and review). Consideration should be given to the following:
 - integrating the GHS into an overarching regulatory framework or having a stand-alone approach
 - ensuring coordination of activities on GHS implementation with other updates to

³ Such as a chemicals committee related to tripartite labour committees, health, industry and trade, agriculture, environment, international agreements, and SAICM, among others

⁴ The guidance developed by UNITAR and collaborators may be useful; see for example section 7 of “Developing a National GHS Implementation Strategy, September 2010 Edition” available at: <https://cwm.unitar.org/publications/publications/ghs.aspx>.

- national chemicals, labour, health and environment-related legislation (if any)
 - timeframes (including provision for transition periods) and milestones to be used/needed in applying the GHS regulatory framework
 - 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).
- Undertake a domestic impact assessment or cost-benefit analysis to showcase the value of implementing the GHS
 - Once the legal framework to be used or adapted is agreed, initiate the process (including stakeholder consultation) to draft⁵, adopt, and publish the new legal measures.
 - International, peer or other forms of review may be included, so as to benefit from other experiences of adopting GHS legislation
 - In parallel with the legal GHS adoption process, other supporting activities – such as preparatory awareness raising 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.

(3) Implementing Activities

Once the GHS has been adopted (legally/administratively) at the national level, a number of implementing activities may need to follow, many or all of which may have been required or specified in the new legal framework (or may need further specification in guidance related to the new requirements). Many of these activities will need to be undertaken on an on-going basis but establishing some initial targets and milestones may prove helpful.

Classify and label (including SDS) chemicals and products according to the new GHS-based framework

- A key task for the private sector will be to conform to the new system and classify and label chemicals and products accordingly, as well as prepare for and apply any transition measures. Industry may wish to develop related standards that address specific issues.
- Measures (such as raising awareness/ training customs authorities) related to the import, export and transboundary transport of chemicals, based on the new framework, will also need to be implemented.

Awareness raising

- Consider how to reach the widest audiences to inform them of the importance of this new national 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.

⁵ One practical approach a country could take to preparation of the legal framework could be to develop a simple table that lists each activity that needs to take place, who is responsible for it, who else needs to be consulted, and the timeframe/deadline.

- Government, industry, labour organisations and civil society should, when appropriate, work together on GHS awareness raising across all sectors.

Technical training

- All key stakeholder groups (government, private sector, labour, civil society and the public) will need different types of technical training. Industry will need training regarding how to apply the new system and how to classify chemicals/mixtures and develop appropriate hazard communication tools; workers will need education and training to understand the new SDS and how to apply appropriate safety practices; consumers and the general public will need to understand the new labels on products and how to interpret them to take appropriate action
- Different formats and approaches 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 programs, user guides.
- For the companies responsible for the implementation of the GHS by classifying and labelling chemicals accordingly, the existing experience gained in multinational companies (whether active in the country or not) could be useful by recruiting them to bring their knowledge, expertise, and resources to train national and local companies. Challenges with respect to SMEs should be given special consideration.
 - This could include service providers offering training on software to run rules and to pull in external content that can generate classification and labelling for products, and enter relevant information into an SDS
 - Private sector partners may also be able to provide assistance on a range of issues, in order to support the transition to a GHS-based trading environment

Communication and outreach

- In addition to any awareness raising activities or campaigns considered above, 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 new 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 information⁶); regular implementation or progress reports; regular roundtable (or other format) dialogue sessions or working groups; impact studies.

Regional dialogue and coordination

- Consider how dialogue and coordination with regional partners and organizations can benefit a regionally harmonised approach to GHS implementation and consider if GHS can be integrated into existing workplans and programmes of regional organizations.

⁶ <https://www.echemportal.org/echemportal/>,
https://www.ilo.org/safework/info/publications/WCMS_113134/lang--en/index.htm

- Cooperate/benchmark with neighbouring countries to pool resources, share information, learn best practices and to prevent or reduce any unnecessary differences in approaches and timelines which can help to avoid trade barriers with the main regional trading partners.
- Consider how transboundary transport (particularly among regional/neighbouring countries) can be undertaken as some or all countries initiate implementation of the GHS

International linkages

- 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 GHS (UNSCEGHS), 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 SAICM⁷ in order to inform the international community of progress on GHS within your country, to share experiences, get feedback and request further resources to support implementation.
 - This could include participation in the UNSCEGHS as an observer or applying to become a member. Once a member, countries may choose to submit informal documents to the UNSCEGHS or provide informational interventions to make others aware of the status of GHS implementation.
- 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 (or other relevant ILO conventions), the International Health Regulations⁸ or contribute to national achievement of the SDGs.

Emergency response

- 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 explosions⁹. 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. knowledge of 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.¹⁰ Labels are required to provide immediate summary 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 poison control centres and others with toxicological expertise is important.

Ongoing stakeholder involvement, monitoring and enforcement

⁷ Pending confirmation of the new framework and name

⁸ As referenced in the WHO chemicals roadmap - <https://www.who.int/ipcs/saicm/roadmapworkbook/en/>

⁹ International Health Regulations: Preparedness and Emergency response is a strategic area as part of the core capacities for chemical events <https://apps.who.int/iris/rest/bitstreams/1060499/retrieve>

¹⁰ For example, as found in the USA/Canada/Mexico "Emergency Response Guidebooks".

- Constant communication between all stakeholders who have responsibility for GHS implementation and with legislators and other policy makers (e.g. via 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 and relevant stakeholders.
- Monitoring, enforcement, and feedback mechanisms should be built-in to the new national GHS framework and need continued support (e.g. inspectorates, customs, health and safety reporting, compliance regimes).

Annex 1: Sample elements of a national GHS roadmap and timeline

Actions/Milestones	Timeframe (indicative)	Responsible Parties
Within a country or region identify key national stakeholders in Government (all relevant ministries and organizations), civil society, labour organizations and chemical industry (including downstream users) to raise awareness and engagement	ASAP (3 months maximum)	Government, civil society, labour organizations and industry
Launch capacity building workshops to raise awareness on the GHS benefits, introductory training on GHS concepts and to start to engage the interested parties. Invite other (particularly neighbouring) countries to share their experiences.	Workshop to take place 6 months after all stakeholders identified	Governments with help of industry and international bodies/governments
Create a national or regional GHS committee with participation of the relevant bodies identified among national stakeholders; make a second round of workshops for building a national implementation "roadmap".	2 months after workshop	All identified stakeholders. Possibility of involvement of international industry + governments
Develop the institutional, legal, and policy capacity and gaps assessment	2 months after the creation of the GHS committee	Identified experts to develop the assessment, and the GHS Committee
Identify options and the most appropriate instrument(s) for national GHS implementation, legal and/or voluntary	3 months after the creation of the GHS committee	GHS Committee
Draft local regulation (new or update legal instrument or standard) and establish a public consultation process	1 year + 1 month consultation	National government
Publish national GHS regulation with clear compliance deadlines.	+6 months	National Government
Establish a national capacity building and training programme for local industry (e.g. trade unions, associations) and government (e.g. inspectors). The results of this programme (e.g. level of compliance) could be checked periodically to ensure that the investment made has been effective	+ 3-6 months	National industry/National government / labour organizations
Monitoring: ensure industry is classifying and labelling according to the new regulation	On-going	National industry/National government
Undertake awareness raising and outreach activities, e.g. media campaigns, social media, posters, etc.	On-going	All stakeholders from step 1
Conduct regional dialogue: regional workshop to share the results with other countries in the same region.	+ 3 years	All stakeholders from step 1