

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

**Sub-Committee of Experts on the Globally Harmonized
System of Classification and Labelling of Chemicals**

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Item 4 (c) of the provisional agenda

**Development of guidance on the application of the
Globally Harmonized System:**

Miscellaneous

Proposed workshops for industry and implementing authoritative bodies to highlight the implementation barriers and provide clear, actionable items to improve effectiveness of the GHS

**Transmitted by the International Council of Chemical
Associations (ICCA)**

Background

1. It has been almost 15 years since countries have started to implement the GHS around the world. The GHS has since been implemented in over 60 countries encompassing 8 out of the top 10 countries with the largest production of chemicals (by sales)¹.

2. Chemicals management throughout the life cycle is still a top priority around the world. This is recognized through the UN Strategic Development Goals (SDGs) in particular SDG 12.4 to achieve environmentally sound management of chemicals in accordance with international frameworks. In addition, the Global Framework on Chemicals adopted in 2023 – For a Planet Free of Harm from Chemicals and Waste Target B6 states that ‘by 2030, all governments have implemented the GHS as appropriate for their national circumstances’.

3. The GHS has been universally accepted and has provided a mechanism to improve chemical hazard communication as well as providing a foundation for countries to implement a national program on chemicals management. However, the GHS has been implemented in only about 60 of the nearly 200 members of the United Nations. In particular, few countries based in Africa and South America have implemented some or all of the GHS. Several challenges and barriers have emerged for both implementation and international harmonization of the GHS. There have been several studies outlining reoccurring issues that threaten these fundamental principles of regulatory convergence and effective implementation, and therefore the international alignment with the GHS and the goals of the Global Framework on Chemicals. Some of these issues are presented below:

- (a) Countries adopting different revisions of the GHS and applying different building blocks;
- (b) Countries adoption of non-GHS provisions in country-specific implementations of the GHS, such as non-GHS hazard classes and criteria or additional requirements for safety data sheets and labelling;

¹ Profile - cefic.org (access 1/18/2024)

- (c) Emerging countries, regulators and industry are still struggling with GHS basic principles and how to implement the GHS (e.g., lack of comprehensive guidance on how to select the elements of the GHS, including building blocks and hazard criteria endpoints that would allow a country to develop GHS-based regulations for the workplace and environmental protection);
- (d) Insufficient technical guidance for implementing countries, resulting in divergent guidance in different regulations and leading to further disharmonization and potential issues with international trade;
- (e) Publication of a GHS revision every two years, when the average time for a country to update its GHS-based regulations is eight to ten years;
- (f) Stagnant participation in the Sub-Committee of Experts on the GHS.

4 Furthermore, the Purple Book clarifies the functions of the Sub-Committee to include managing and giving direction to the harmonization process, to promote understanding and use of the GHS and to encourage feedback, and to make guidance available on the application of the GHS and on the interpretation and use of technical criteria to support consistency of application². Together, these functions point to a need for the Sub-Committee to take a greater leadership role in promoting the implementation of the GHS worldwide.

ICCA proposed outreach

5. The International Council of Chemical Associations (ICCA)'s 164 members account for more than 98% of all global chemicals trade and contributes nearly \$2 trillion to the global economy. The lack of GHS implementation and disharmonization creates inconsistencies and deficiencies in the protection of worker's health and safety in countries where they operate, as well as an increased regulatory burden and costs to comply with a variety of classification and labelling systems. The importance of international alignment and harmonization on the classification and labelling of chemicals cannot be overstated.

6. The discussion above indicates that there are several avenues that should be explored to improve the implementation and convergence of the GHS. To build on these reports, ICCA proposes to set up a series of workshops to highlight the above issues with the intent to provide clear, actionable items to improve the effectiveness of the GHS and foster more active participation of representatives from developing countries in the Sub-Committee's process.

7. These workshops would be held bilaterally between targeted countries and the relevant national chemical association. To guide discussions on these topics, content would be focused on the following areas that have been identified as problematic for implementation and convergence:

- (a) The regulatory consequences of the ongoing work in updating the GHS, including the work of the Potential Hazard Issues working group (PHI-IWG) to countries, and the potential impact of these updates (e.g. new hazard classes) should they be included in the GHS;
- (b) The need to coordinate the timing of the implementation of updated revisions of the GHS and why such work would be important to the harmonized implementation of the GHS;

² See section 1.1.3.2. *Implementation and Maintenance of the GHS*.

- (c) The identification of other barriers countries face in implementing or updating the GHS.

8. Based on the outcome of these discussions, ICCA would then suggest items for countries or other international organizations to take that may begin to address these issues, including involvement within the Sub-Committee or its informal working groups (e.g. PHI-IWG), or the type of documents, outreach or guidance that may be valuable for the Sub-Committee to address to further the implementation of the GHS.

Action requested

9. The Sub-Committee is invited to take note of ICCA's proposed outreach plans and provide feedback to ICCA.

10. Additionally, any country interested in participated in the workshops please contact ICCA.
