2016 GHS Implementation Progress Reporting Template

Introduction

This template has been designed to provide a practical insight into the progress of GHS implementation in each APEC member economy. It builds on the ideas and information from Annexes 1 and 2 of the Report of the Virtual Working Group on GHS Implementation *"Developing Clarity and Consistency in the Implementation of the Globally Harmonized System for the Classification and Labelling of Chemicals (GHS)"* endorsed at the 7th Chemical Dialogue meeting at Peru in May 2008. This report is intended to complement the UN GHS reporting.

The intent of this template is to identify the progress of GHS implementation in each member economy and each sector, and to identify sector specific and cross-sectoral implementation issues that may be of interest and/or concern to other economies and industry. Once identified, these issues may be addressed through further discussion between member economies, with the assistance of the Chemical Dialogue or referred to the United Nations Sub-Committee of Experts on the Globally Harmonized System of classification and labelling of chemical products (UNSCEGHS).

In order to achieve these objectives, the template is divided into a general section, industrial sector, consumer goods, agricultural chemicals and transport. Detailed and specific answers should be provided for each of the questions. Where a reference is made to documents, information on how to access these documents should follow.

Please answer all sections, even if your economy has a single set of regulations and a single regulatory body working on GHS implementation. This will help to identify any differences in approaches adopted by the different economies.

At the APEC CD 2014, the CD agreed to trial the use of an online based Smart Form to report on the GHS Implementation. Noting that additional work is ongoing on the Smart Form to make it more user friendly, the CD agreed that Members can complete either the Smart Form or this word document template.

If you require any assistance on filling out this template or the Smart Form, please contact the Catherine Oh of the Virtual Working Group on GHS at coh@accord.asn.au.

History

In 2009, nine out of 21 member economies of the APEC Chemical Dialogue (CD) completed the GHS Implementation Progress Reporting Template (Template). This process not only provided invaluable information regarding the progress of GHS implementation in these economies, but the participating member economies also reported that the process of completing the Template enabled articulation of implementation issues for further discussion.

With the finalisation of the 2009 report, APEC CD agreed that the Template should be completed by APEC member economies at regular intervals to provide the opportunity for economies to share the GHS implementation workload and draw on the experiences of others in the implementation of the GHS. Regular reporting will also provide opportunities for industry to work more closely with economies to progress the development of the GHS and identify implementation issues of concern at a practical level.

Six GHS implementation reports have been finalized so far – 2009, 2010/11, then annually from 2012 to 2015. Summary of implementation progress was compiled for APEC Ministers in 2009, then annually from 2011 to 2015 based on these responses. At the APEC CD 2012 a decision was reached to publish the GHS implementation reports on the GHS Reference Exchange and Tool (GREAT) website hosted by the Chinese Taipei to allow sharing of this information

(http://great.osha.gov.tw/ENG/index.aspx). It is expected that the 2016 report will also be made available on the GREAT website.

General

Please provide the Economy for which this Template is completed below.	
Have you completed a GHS implementation status report in previous years?	
x Yes	☐ **No**
If yes, please provide the year when the last report was completed.	
In June 2016 classification and label for substances and mixtures went into effect for workplace chemicals	
Has there been any changes to the GHS implementation status in your economy since completing the last GHS implementation status report?	
☐ **Yes**	**x No**
If yes, go to next question. If no, no further answers are required.	
Does your Economy intend to adopt and implement GHS for any chemical sector in the near future (Starting work within the next 2 years)?	
☐ **Yes**	☐ **No**
If yes, go to next question. If no, no further answers are required.	
Is there an overall strategic plan for GHS implementation?	
☐ **Yes**	☐ **No**
If yes, where can it be found? Please list websites, attach documents, etc.	
Do you have a GHS coordinator to facilitate implementation discussions within your economy?	
☐ **Yes**	☐ **No**
If yes, please fill out the following information for the coordinator:	
Organisation / Agency	
Name	
Phone number	
E-mail address	
Website	
Do you have a hazard classification database?	
☐ **Yes**	☐ **No**
If yes, is it mandatory classification, or for information only? How do you access the database?	

Industrial Workplace

Regulator to complete	
Do you intend to implement GHS for this sector?	
X Yes	☐ **No**
If yes, please provide the following details. If no, no further answers are required for this section.	
Lead Government Agency	**US OSHA (Occupational Safety and Health Administration)**
Contact person	**Maureen Ruskin**
Phone number	**202-693-1955**
E-mail address	**Ruskin.maureen@dol.gov**
Website	**http://www.osha.gov/dsg/hazcom/index.html**
When do you plan to implement GHS for this sector?	
GHS was first implemented in March 2012	
How long is the phase in period and what are the transition arrangements?	
3 year transition period – went into force June 2015	
Are the main relevant legislations implementing GHS finalized and in operation?	
x Yes	☐ **No**
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
http://www.osha.gov/dsg/hazcom/index.html	
Do you intend to adopt all hazard classification building blocks GHS as is written in the purple book?	
X Yes	☐ **No**
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitisers. If no, please describe the building blocks that will be adopted.	
OSHA has chosen the lower cut-off values when the purple book has given the choice – except for carcinogen 2 (1.0% for labels and 0.1% for SDSs) **OSHA has adopted all hazard classes but did not adopted the following hazard categories:** **Aspiration category 2** **Acute toxicity category 5** **Skin irritation category 3** ***See Annex 1 for full list of the Hazard Classes and Categories that OSHA adopted and the complete list of cut-off values for labels and SDSs***	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
x Yes	☐ **No**
If yes, please provide full details of non-GHS criteria being considered for adoption.	
OSHA has adopted the following Hazards currently not in the GHS (please see attached for definitions and labeling elements) See Annex 1 **Simple asphyxiants** **Pyrophoric Gas** **Combustible dust** **OSHA has also introduced the term Hazards Not Otherwise Classified similar in concept to Safety Data sheet Section 2 (Annex 4 – A4.3.2.3 Other hazards which do not result in classification)**	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
No	
Is there to be a maximum number of the following included on the SDS and the label?	

Pictograms	**No**
Hazard statements	**No – OSHA has provided some flexibility for omitting an inappropriate hazard statement --** *C.2.2.2 If the chemical manufacturer, importer, or responsible party can demonstrate that all or part of the hazard statement is inappropriate to a specific substance or mixture, the corresponding statement may be omitted from the label.*
Precautionary statements	**No - OSHA has provided some flexibility for omitting an inappropriate precautionary statement(s)** *C.2.3.3 Where a pictogram required by the Department of Transportation under Title 49 of the Code of Federal Regulations appears on a shipped container, the pictogram specified in C.4 for the same hazard shall not appear.*

How is the hierarchy of pictograms, hazard statements and precautionary statements defined?
OSHA has adopted the same hierarchy as the GHS purple book
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or "deemed-to comply" provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?
No – The regulation states that the importer must ensure that the label complies with the US standard. However, the US and Canada are working together to minimize and/or highlight variances between the labeling and SDS requirements.
Do you have training and awareness activities planned? If yes, please provide some information.
OSHA continues to provide guidance through public meetings, presentations and comprehensive website.
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?
We currently do not have plans to exchange personnel.
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
Labeling on small packagings; keeping legislation current with updated revisions of the GHS
Industry to complete
Has it been easy to access all necessary information for compliance?
Do you see any specific issues that are limiting the progress of GHS implementation?
What are the expected costs for industry in the implementation of GHS?
What are the expected benefits for industry through the implementation of GHS?

Consumer Products

Regulator to complete	
Do you intend to implement GHS for this sector?	
☐ **Yes**	☒ **No**
If yes, please provide the following details. If no, no further answers are required for this sector.	
Lead Government Agency	
Contact person	
Phone number	
E-mail address	
Website	
When do you plan to implement GHS for this sector?	
How long is the phase in period and what are the transition arrangements?	
Are the main relevant legislations finalized?	
☐ **Yes**	☐ **No**
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
Do you intend to adopt all hazard classification building blocks GHS as is written in the purple book?	
☐ **Yes**	☐ **No**
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitisers. If no, please describe the building blocks that will be adopted.	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
☐ **Yes**	☐ **No**
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or “deemed-to comply” provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS implementation?	

Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
Industry to complete
Has it been easy to access all necessary information for compliance?
Do you see any specific issues that are limiting the progress of GHS implementation?
What are the expected costs for industry in the implementation of GHS?
What are the expected benefits for industry through the implementation of GHS?

Agriculture

Regulator to complete	
Do you intend to implement GHS for this sector?	
☐ **Yes**	☒ **No**
If yes, please provide the following details. If no, no further answers are required for this sector.	
Lead Government Agency	
Contact person	
Phone number	
E-mail address	
Website	
When do you plan to implement GHS for this sector?	
How long is the phase in period and what are the transition arrangements?	
Are the main relevant legislations finalized?	
☐ **Yes**	☐ **No**
If yes, please provide a means of access to the document. E.g. web-link, contact person. If no, when do you expect it to be finalized?	
Do you intend to adopt all hazard classification building blocks of GHS as is written in the purple book?	
☐ **Yes**	☐ **No**
If yes, please indicate the cut-off points you will be adopting where the choice is given in the purple book. E.g. sensitisers. If no, please describe the building blocks that will be adopted.	
Do you intend to adopt any non-GHS classification criteria? E.g. classification of flammable/combustible liquids beyond 93 °C.	
☐ **Yes**	☐ **No**
If yes, please provide full details of non-GHS criteria being considered for adoption.	
Will there be a risk assessment element overlayed on top of GHS classification on the label? If yes, how will it work?	
Is there to be a maximum number of the following included on the SDS and the label?	
Pictograms	
Hazard statements	
Precautionary statements	
How is the hierarchy of pictograms, hazard statements and precautionary statements defined?	
Do you have any arrangements in place to deal with imported chemicals / products? i.e. is there a plan to implement alternate compliance provisions or “deemed-to comply” provisions and will you accept additional classification criteria (GHS or otherwise) not adopted by your economy?	
Do you have training and awareness activities planned? If yes, please provide some information.	
Are there any plans to exchange personnel with another economy to improve harmonization of GHS	

implementation?
Please list any specific issues of concern you have experienced so far during your GHS implementation efforts.
Industry to complete
Has it been easy to access all necessary information for compliance?
Do you see any specific issues that are limiting the progress of GHS implementation?
What are the expected costs for industry in the implementation of GHS?
What are the expected benefits for industry through the implementation of GHS?