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Division of Environmental Health | UCT

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University of Cape Town's CHEMICALS NETWORK

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Digest Summary of Discussion 5 2021

The fifth discussion of the UCT Chemicals Network was entitled **"Chemicals registration and monitoring"** and was presented by Mr Mel Biring from Lubrizol Limited, Dr Irina Zastenskaya from WHO Europe, Dr Nana Gabriadze from Department of Environmental Health in Georgia, and Ms Snezana Markovic from the Ministry of Environmental Protection in Serbia. Chemicals registration and monitoring involves a process that can be followed to ensure that all relevant chemicals manufactured and imported into a country are registered, with the appropriate safety information and uses of these chemicals noted and tracked. This process is a step towards achieving sound chemicals management. To view the PowerPoint presentation from this discussion, click here.

ABOUT THE PRESENTERS

Mr Mel Biring is working at Lubrizol Limited in Derby, UK where he is currently Global Product Regulatory Advocacy Manager, monitoring and advocating on best practices within global emerging issues related to industrial chemical legislation. He has more than 20 years of experience in the field of global industrial chemical regulation and REACH. He has held positions as Global Product Compliance Specialist and Manager of Product Compliance EMEAI where he led and managed REACH compliance activities for the Lubrizol Corporation and provided guidance on development and enhancement of corporate systems and business processes to ensure compliance and to promote early integration of EMEAI regulatory requirements.

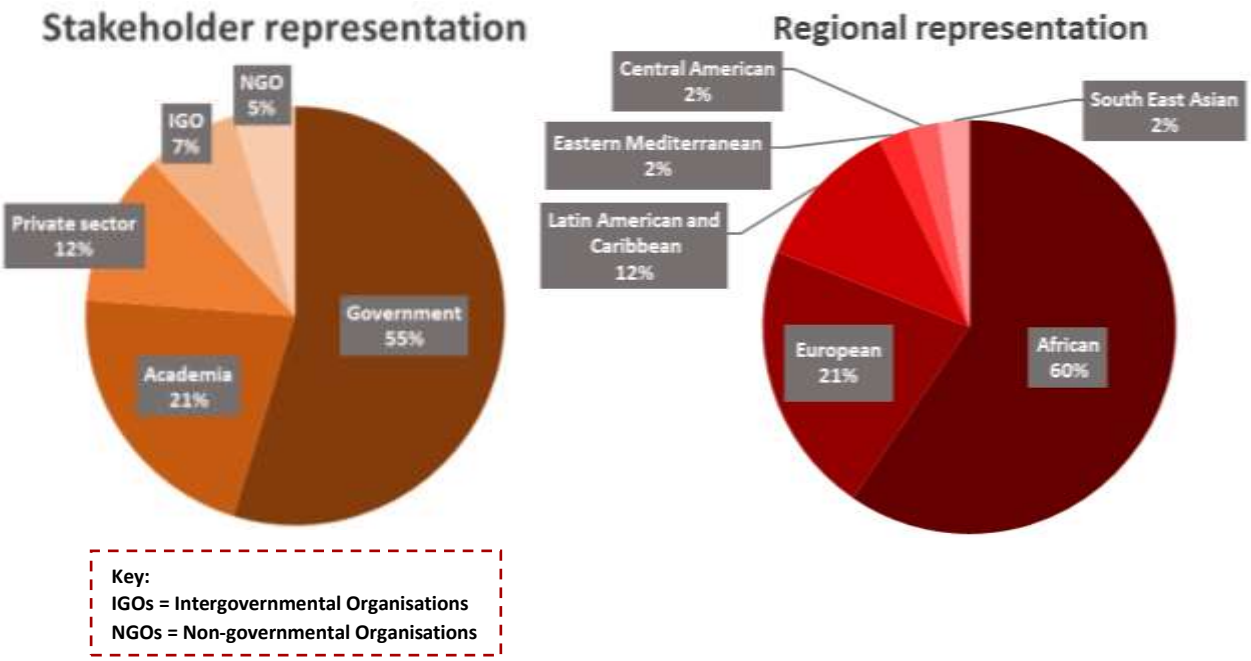
Dr Nana Gabriadze (Georgia), MD, PhD, Head of the Department of Environmental Health at the National Center for Disease Control & Public Health of Georgia. She has vast experience of working on Environmental Health issues, good knowledge of Environmental Health legislation and codes of practice, participates in the elaboration of Hygienic Rules, Technical Regulations, awareness raising campaigns, other state projects and programs. Her broad experience includes investigation of impact of the environmental risk factors on human health. Furthermore, she is currently employed an associated professor at the University of Georgia.

Dr Irina Zastenskaya, MD, PhD, Technical Officer for Chemical Safety in WHO European Centre for Environment and Health located in Bonn, Germany. The portfolio includes all areas of chemicals safety with the main focus on chemicals and human health. She has an extensive experience on development and implementation relevant policies at international, regional and national level, coordinated a number of scientific projects in chemicals management area. She Is an experienced lecture and a trainer and organized a number of trainings to strengthen of capacity in countries She has authored approximately 150 publications in the area of environmental health.

Ms. Snezana Markovic, MSc of chem. Eng. and a Senior advisor with 10 years' experience in preparing and analysing data from the Register of Chemicals. She has expertise in statistical processing for the purpose of reporting to the inspectors, state bodies, institutions, the public, and international bodies; cooperating with international organizations and organizations that maintain similar Registers; and participating in international projects related to risk reduction of chemicals. She is an expert consultant for the development and improvement of the Information system for database management with 20 years' experience working in the industrial sector.

2021 DISCUSSION 4 ATTENDANCE BREAKDOWN

 # ATTENDEES: 42
Female –57 %
Male – 43%



Key:
IGOs = Intergovernmental Organisations
NGOs = Non-governmental Organisations

KEY MESSAGES FROM THE DISCUSSION

1. Chemicals are present in large numbers of different products and **capacity building** at the regulator and within local industry is required to facilitate well-functioning chemical databases, considering the necessary scope. These databases can then be used as foundations for chemicals registration and monitoring activities and form a good starting foundation.

2. Preparation for establishing the register of chemicals includes **the following critical steps:** gathering information on the solutions of other countries; model selection for the register; decision making on which chemicals are covered (depending on the structure of industry and imports); determination of who submits the data, which data should be submitted, the dynamics of data submission and the best way for data to be submitted; capacity preparation (state institutions, stakeholders) and legislation development.

3. A further way to **optimise** the process of chemicals registration and monitoring would be to **introduce an element of IT infrastructure**, whether that includes collecting data in paper form and uploading it to an electronic database or establishing an electronic data collection system. The idea of these kinds of systems would be to generate various reports to deliver base information for chemicals management and other relevant decisions.

4. Finally taking a **step-by-step approach** when establishing a chemicals registration and monitoring system is ideal and a well thought out and established system is important when wanting to improve data collection and management over time.

CONTRIBUTIONS FROM DISCUSSION PARTICIPANTS

The discussion was structured around three questions. The key discussion points raised by participants and organized by themes or countries (although not representative) are presented under each:

Question 1:

Do you have any experience with chemicals registration and monitoring in your country? Give examples. What are some of the challenges faced in your country or organisation when it comes to chemicals registration and monitoring?

COUNTRY:	PARTICIPANT RESPONSES:
IRAN (Academia)	- Experience with pesticides registration and regulations (as an academic and nothing for profit). - Not only helping Iran but also for the past 20 years helping regionally and globally unofficially by presenting many globally wide talks. - For pesticides: the term "Chemicals regulations" covers the whole of nature (people, environment and wildlife) and all chemical substances including pesticides and biocides and their metabolites. - According to past experiences (e.g. for importation of Azadirachtin, Piperonyl butoxide), there are strict rules for passing through customs. - If the compound is for research, there are fewer steps than if it is for industrial use.
JAMAICA (NGO)	- No experience with Chemicals Registration, however, monitoring would be through the poison surveillance system. - There is a robust chemical registration system in place, however, monitoring is inadequate due to limited manpower and infrastructure for specific monitoring requirement. - A present challenge in the registration process is the consistent review of registered chemicals to identify HHPs and Banned chemicals from other countries.
SOUTH AFRICA (Academia)	- There is a kind of pesticide registry in SA which the industry now houses but in terms of quantities of use it is a bit thin.
SOUTH AFRICA (Government)	- The post registrations of chemicals are not done regularly as there are some chemicals still registered that should be re-evaluated and removed. - Pesticides are registered before they are used in the country and industrial chemicals are still lagging in terms of registration. - Pre-registrations also need to do more rigorous environmental risk assessments especially for chronic risks before pesticides and industrial chemicals are registered.
Zambia (Government)	- Zambia has Chemical registry but there is very little awareness in the community with very little knowledge being passed on.

Throughout the discussion, informal polls were conducted to help encourage discussion among the participants. They do not provide any representative data but rather provide a snapshot of participant views.

Poll 1 Results (N = 12)

Does your country have a chemicals registry set up?

Yes (n = 6):

- Iran
- Mauritania
- Myanmar
- Sweden
- "Yes, but for pesticides and very limited for industrial chemicals."

No (n = 3):

- Sierra Leone
- South Africa
- Venezuela

I don't know (n = 1):

- South Africa

In process (n = 2):

- Argentina

Poll 2 Results (N = 12)

What do you think should be the first step for establishing a Chemical Registry?

Start with already existing measures (n = 2):

- "Assess existing registries and gaps."
- "A desktop study of what is already in the country, then a needs assessment."

Capacity Building (n = 3):

- "Training infrastructure, list of manufactured and imported chemicals."
- "Capacity building on Chemical registration."
- "To decide what the register should be used for."

Stakeholder engagement (n = 4):

- "Start simple with what companies are supplying chemicals in your country."
- "Determine the stakeholders that should be involved in establishing the registry and approaching them to be involved in setting it up."
- "1-A pesticide/chemicals and biocides advisory committee. 2-Highly qualified team of Entomologists, mycologists, chemists, lab analysis experts, lawyers, other related experts. 3-Highly equipped labs for analysis and testing methods and related documents like CIPAC, Pesticides Manual, etc. 4-Good relations and communications with related global/UN agencies particularly FAO and WHO and with regional corporations."
- "Chemical's importers, factories/companies that are producing pesticide formulation and importing semi-product."

Legislation (n = 1):

- "It should be required in legislation that industry must indicate the chemicals being imported into countries that do not manufacture and also chemicals in products."

Question 2:

What do you feel your country would need to establish a chemicals registration and monitoring system? Please state the country you are from and elaborate on how a chemicals registration and monitoring system could look in your country. If your country has a registration system, what are the needs to make the system efficient?

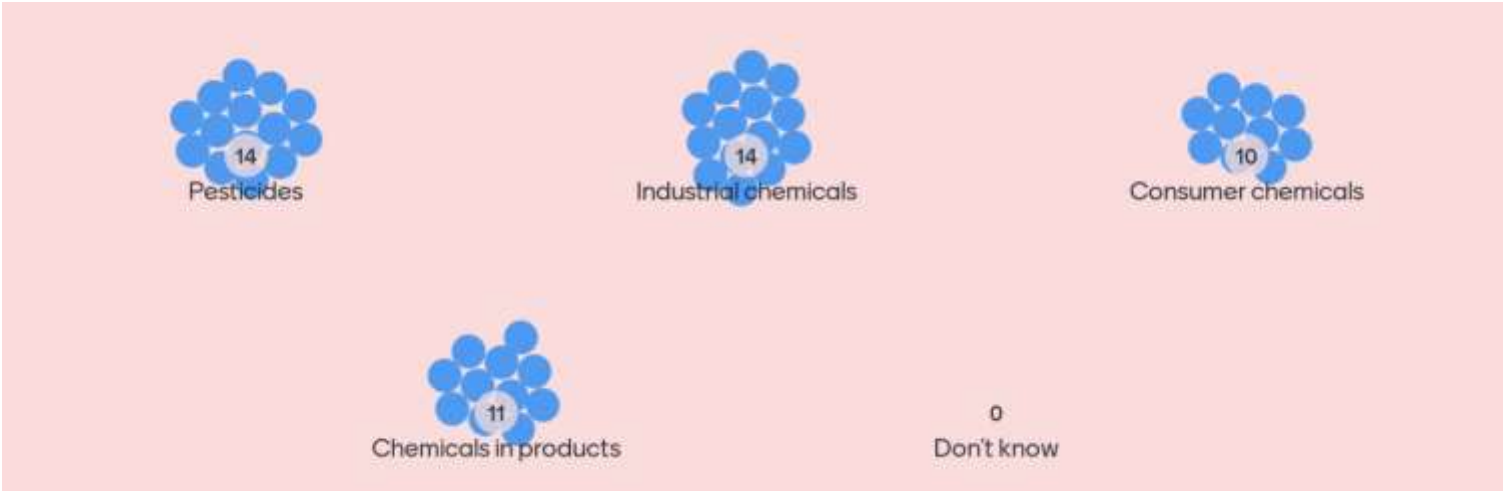
COUNTRY:	PARTICIPANT RESPONSES:
IRAN (Academia)	- Improving infrastructures and enforcement. - Related inventory and database. - Preventing illegally imported chemicals (as a general term for pesticides/chemicals and biocides). - More cooperation with related agencies. - More involvement of private section.
Chile (Private sector)	- Chile is developing a registry that is targeted. - Reporting is based on SDS listed substances per local GHS requirements that enables importer to easily gather required information. - Where updates are needed, anything more than biannual is too much and the updates should be done when information is changed, rather than where it hasn't changed. - The World Trade Organisation's Agreement on Trade Related Aspects of Intellectual Property Rights (WTO TRIPS) contains info on what is Intellectual Property (IP). - This gave rise to what can be registered as Confidential Business Information (CBI) under EUREACH Art 119.
JAMAICA (NGO)	- There is a process to importing chemicals within the country. - Each agency and Ministry which has the portfolio for this and should formalize a database for the different categories of chemicals. - These agency and Ministries include the Customs Department, Trade Board, Standards and Regulation Unit and Pesticides Control Authority in the Ministry of Health and Wellness. - Efficiency can be ensured through training of dedicated staff for the process, providing the relevant IT and other resources to support working tools and maintenance of system.
Brazil (Government)	- A registry system for pesticides, for chemical industry and for some consumer products is in place. - Besides that a project law for chemical management was devised but it has not been approved yet.
SOUTH AFRICA (Academia)	- It is a problem now that the pesticide registry in South Africa is housed by the industry as you 1) must pay to access it and 2) must indicate what you will use the info for. - Some colleagues have been denied access. - Without knowing what chemicals are in products that are imported into our countries, it is then not possible to indicate on the labels what these chemicals are - for example - flame retardants. - Unless, of course, legislation requires this.

	- There is something wrong if a government department has to pay to access the pesticide register. - Establish a mandatory system of annual (online) declaration by manufacturers, exporters, and importers of the various types of chemicals, their uses, toxicological information, and their volumes. - This info should be in a publicly accessible database to assist researchers with data for research. - Also include an enforcement, monitoring and surveillance system with punitive measures for non-compliance. - Using registers as an opportunity for assessing alternatives is also important.
SOUTH AFRICA (Government)	- The registry will need to be housed by the government and not the industry as it is now. - The registry should be freely available to all government organizations and all parties that want to know what chemicals are being used/sold/disposed of in the country due to the risks to the people and environment. - The monitoring of the chemical's registry should be done by the government when it comes to legal compliance and by interested parties and/or government when it comes to incidence of poisonings in communities and environment.
SWEDEN (Government)	- In Sweden the registers for pesticides and the one for Chemicals are different. - The one for pesticides gives information to the public, users, and enforcement about which are authorised and how to use them. - The register for chemical Products is not public as it is but gives the state information about suppliers and substances/mixtures on the market in the country (for decision making, and enforcement). - These statistics (where the companies are not mentioned) is published for the public. - Because there is an authorisation system for pesticides (plant protection products and biocides), information on which products are authorised and for what purpose is published. - For industrial and consumer Chemicals there is no authorisation process. - However, the amounts sold of pesticides also needs to be submitted into our products register (for chemicals), and these amounts sold for pesticides are treated similarly as for chemicals - it is not published for each product (considered confidential), but statistics are published. - Pesticides are included in the Products register. And in addition to that we have a separate register for pesticides as well, due to the separate procedure and requirement for authorisation. - Pesticides have more information and publish more information. - If both registers were started at the same time, there may have been one system. - Hope countries will build on the lessons learned in Sweden with registration of chemicals vs pesticides. - It should be taken into consideration what level of detail you need and can take care of. - Good to go step by step, and not start with the same amount of data that Serbia has today.
ZAMBIA (Government)	- While we already have a Register for Chemicals..this is mostly for Agricultural and Industrial Chemicals. there's still need to establish one for Personal Care Products and further monitor them in the environment, food and human matrices. - In Zambia we have registry for Pesticide and Industrial chemicals. it will be useful to also include chemicals in products and household

	- Pesticides, we need the Government to register chemical and provide stakeholder engagement on monitoring - It is necessary to enhance the enforcement and education about the chemicals on the market for the purposes of compliances

Poll 3 Results (N = 14)

Which type of chemicals do you think should be placed on a chemicals registry and monitored? Multiple answers could be chosen.



Poll 4 Results (N = 15)

Who do you think should be involved in the process of establishing a chemicals registration and monitoring system?

Iran:

- "Related ministries: Health, Agriculture, Commerce and their relevant experts." – Iran

Mauritania:

- "Government and a regional organization"

South Africa:

- "Government (including the health department). Manufacturers, suppliers and representatives from consumer groups (or people who have consumers that will be exposed to chemicals). Anyone involved in the whole supply chain and life cycle."
- "All relevant government departments (health, agriculture, environment, and employment) and NGOs and interested stakeholders. Chemical companies should provide information but not drive the process."
- "All key stakeholders involved with chemicals management, various government bodies (health, labour, trade and industry, agriculture) and industry."
- "Government for establishing and monitoring and industry for feeding information into the system. Industry should be involved in the development of the system to ensure that it is implementable." – South Africa

Suriname:

- "The government, in particular, the Environmental Authority." – Suriname

UK:

- "Building a register is not a one-time thing. It needs to be maintained and updated. If you give it huge scope, then that maintenance goes up." – UK

Zambia:

- "I think we need involvement of all relevant and affected stakeholders at the very initial stages."

Unknown:

- "Consideration of scope and understanding of what information will be possible to gather, especially in the case of countries largely dependent on imported products."
- "Stakeholder's meeting. Policy, training, infrastructure, sustainable funding and an identified agency or Ministry for accountability."
- "Government departments – health, environment, labour, agriculture, trade and industry, customs for registration and academia, research institutions and government departments for monitoring."
- "EPA, Customs, Agriculture and Industries."
- "A chemical registration board consisting of authorities from agriculture, labour, health, environment, industry sectors should be involved in monitoring."
- "Criteria on the scope of the register has to be well agreed by all stakeholders."

Poll 5 Results (N = 11)

How would you suggest data could be collected for establishing a chemicals registry?

Data collection during importation (n = 3):

- "Custom manifest for imported chemicals and approved registration application forms made to the government."
- "Submitted by the one placing the chemical product on the market."
- "In many LMICs, chemicals are not produced but imported. The data should be collected 1) at importation from the import license, 2) annual reports submitted by industry to renew the license that included the amounts of chemicals used and for what."

Multi-faceted systems (n = 4):

- "Usage patterns in country, import data, registration of chemicals data at NDA office, export data, sales of chemicals data, statsSA data."
- "A multisectoral system should be developed since most institutions already collect information independently. Toxicological information can be collected from research institutions."
- "A comprehensive database connected to all related governments and private agencies involved with chemicals importations/productions."
- "Perhaps a system like that set up for the automotive industry. There are IMDS (International Material Data System) registries set up to monitor the chemicals in various vehicles."

Submission of data by relevant parties (n = 4):

- "Development of the law that would require industry to provide information and the user-friendly system at which the information will be provided to."
- "Submission of SDS listed hazard information for products (mixtures), and perhaps broad uses is a good starting point."
- "Through manufacturers, importers and distributors and users, relevant authorities can conduct assessment and data collection."
- "The import, production, use and disposal should be regulated in a way that requires the industry to provide the necessary data."

Key resources:

- **Understanding REACH**
  https://echa.europa.eu/regulations/reach/understanding-reach

- **European Chemical Agency (ECHA) website**
  https://echa.europa.eu/

- **WHO Europe: National chemicals registers and inventories: benefits and approaches to development.**
  https://www.euro.who.int/__data/assets/pdf_file/0018/361701/9789289052948-eng.pdf

- **European Chemical Agency (ECHA) website**
  https://echa.europa.eu/

- **IOMC toolbox for decision-making in chemicals management**
  https://iomctoolbox.org/

Chemical Network: The Chemical Network is a non-partisan online forum established by the Division of Environmental Health (DEH) at the University of Cape Town's (UCT) School of Public Health and Family Medicine. It was established as part of a knowledge management and sharing project supported by the Swedish Chemicals Authority (KemI).

This forum has been produced with financial assistance from Sweden, through the Swedish International Development Cooperation Agency (SIDA), which has been arranged by the Swedish Chemicals Agency (KemI). The views herein shall not be taken to reflect the official opinion of SIDA or the Swedish Chemicals Agency.

If you have any question or require clarification on this initiative, please contact UCT at chemicallistserver@gmail.com.
If you are not already a member, to join the Chemical Network at: https://forms.office.com/r/Lk1tgAL6DF