

University of Cape Town's CHEMICALS NETWORK

Issue: 2 of 2020

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Discussion Forum Digest

This discussion, led by Oliver Wootton from UNITAR, entitled “GHS Mapping Session”, focused on three questions addressing implementation of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). With the adoption of the Plan of Implementation, the World Summit on Sustainable Development (WSSD, 2002) encouraged countries to adopt the GHS as soon as possible. Echoing this sentiment, the High Ambition Alliance stated it as essential for all countries to implement the GHS and UNEP’s GCO-II called for full implementation. However, the GHS is still not operational in more than 120 countries. The aim of this discussion was to explore the status of GHS implementation in the participants’ countries, as well as potential challenges to implementation experienced by participants of this discussion. To see your countries’ implementation status (as of 2017), click the following link: <https://www.mdpi.com/2071-1050/9/12/2176/s1>.

ABOUT THE PRESENTER



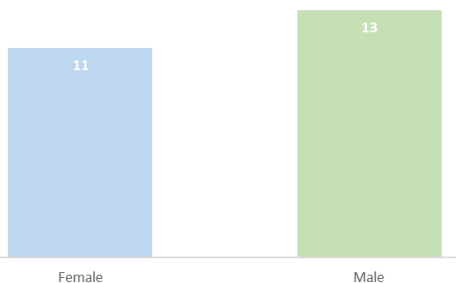
Oliver Wootton is a specialist in UNITAR’s* Chemicals and Waste Management Programme, with over 10 years’ experience working in sustainable development, health and environment, in Malawi and within the UN. Oliver has led UNITAR’s portfolio on the GHS since 2015, coordinating the GHS e-Learning course, managing and developing national capacity building projects, researching the status of GHS implementation around the world, and serves as UNITAR’s focal point to the Global Partnership to Implement the GHS (ILO, OECD and UNITAR, plus a coalition of partners).

*United Nations Institute for Training and Research

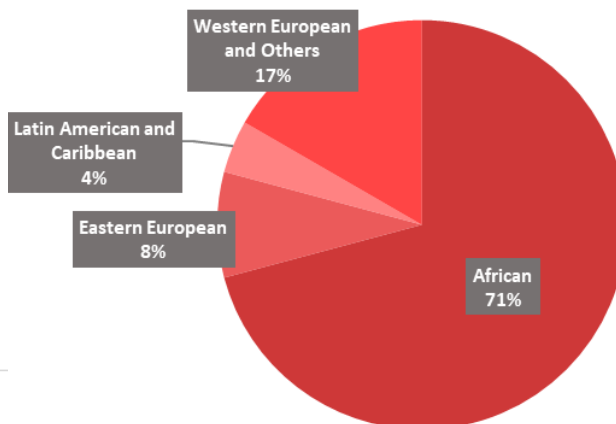
ATTENDANCE BREAKDOWN

ATTENDEES: 24

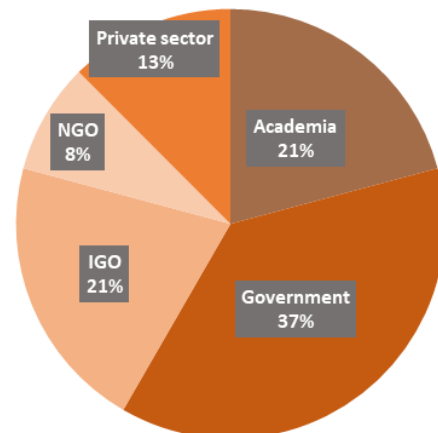
Gender representation



Regional representation



Sector representation



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

KEY MESSAGES FROM THE DISCUSSION

1. Many countries have not implemented the GHS and there are different interpretations of “implementation” of the GHS (e.g. legislation is in place, including mechanisms to monitor and ensure compliance, the development of standards, and voluntary implementation)
2. More work is needed to assist countries with prioritizing and going through the steps of GHS implementation nationally and regionally
 - a. Regional implementation may be a good way to coordinate GHS implementation across a group of countries
3. Awareness raising was a key area identified for countries to bring in the GHS successfully, both for policy makers and for users once the system is in place.

CONTRIBUTIONS FROM THE PARTICIPANTS IN ATTENDANCE

The discussion was structured around three questions and the key discussion points are presented under each:

Question 1:

Has your country implemented GHS? What do you understand by implementing GHS and what does this implementation look like (i.e., legislation has been implemented, compliance by manufacturers, monitoring and enforcement by authorities etc.?)

SOUTH AFRICA (Academia)	<ul style="list-style-type: none"> - “Implementation” is when the correct GHS labels are on chemical products at the points of sale. - Currently this is not the case in South Africa - Countries with GHS implemented need to incorporate the GHS requirements into their chemical policy. - Chemicals should not be sold if they do not comply with the GHS requirements.
SWEDEN (Government)	<ul style="list-style-type: none"> - GHS is implemented in the EU CLP regulation covering all chemicals (not sector-wise)
NIGERIA (Private Sector)	<ul style="list-style-type: none"> - Industries are mandated to have their products properly labelled in guideline with GHS. - It is part of the dossier requirements demanded by NAFDAC during the registration of a pesticide. - However, not all products on the market meet the requirement and it is still unknown how these chemicals get approval for market. - Nigeria has not fully implemented the GHS. - In 2005-2007, we participated in UNITAR/ILO GHS capacity building program with the hope of developing subsequent implementation programs.
TOGO (Academia)	<ul style="list-style-type: none"> - Togo has not implemented GHS and no work is currently being done on getting GHS implemented. - Implementing GHS should mean that the requirements of GHS are included in legislation and monitored by manufacturers.
ESWATINI (Private sector)	<ul style="list-style-type: none"> - Eswatini has not implemented the GHS. - There is currently no legislation for chemical management though a bill has been lying without enactment for a while now. - There is no requirement or standards which any of the sectors must comply to when handling chemicals.

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=7)

Do you think the GHS should be promulgated into law in your country?

Yes: 7
No: 0

Poll 2 Results (N=7)

To me, GHS implementation means (multiple responses allowed):

Legislation has been implemented:	6
Compliance by manufacturers:	6
Monitoring and enforcement by authorities:	6
Standard developed:	2

Question 2:

Has the implementation of the GHS been prioritised in your country? If yes, what prompted this prioritization? If no, are there any discussions underway? Is it specified as a priority in any national planning documents?

SOUTH AFRICA (Academia)	<ul style="list-style-type: none"> - There has been a lot of research done on the comprehensibility of the GHS pictograms (many arguing that it is not easily understandable for all end-users). - There is a prioritization made in the academic sector for awareness, but government should be responsible for implementing it on a community level. - South Africa has so many different languages and cultures that makes a harmonized approach to implementation difficult - but achievable if done right.
UNITAR (IGO)	<ul style="list-style-type: none"> - Most of our work has been done under SAICM and the Quick Start Programme, this generally leads us to working with ministries of environment. - Agriculture ministries are already taking GHS into consideration for pesticides, and ministries of labour could also be considering workplace safety issues that align with the GHS. - These are valuable starting points, even if doing it across all areas where chemicals are used (so everywhere really...) may be our goal. - Comprehensibility testing used to be a part of the GHS development to see if it could be understood, so the design could be as universal as possible. - Now that the system is in place, the comprehensibility for setting up is not undertaken. However, comprehensibility for the purposes of usage would certainly be a valid concern.
TOGO (Academia)	<ul style="list-style-type: none"> - There are needs about awareness raising in African countries, noting that a great part are illiterate. - Awareness raising of decision makers will be more effective and lead to campaigns of IEC through populations. - What is important to include is that African people are not aware of hazards.
ESWATINI (Private sector)	<ul style="list-style-type: none"> - Unsure if implementation has been prioritized but the discussions are ongoing since the country is a member of the Southern African Development Community (SADC). - Assumptions are that the proposed chemical management bill includes specific sections on GHS. - General awareness raising is needed in Africa and particular efforts to include decision makers is critical. - An example is that, often even if legislations /regulations are brought to lawmakers for passing, they are normally not prioritized possibly because of awareness.

Poll 3 Results (N=5)

What have been the key problems and/or barriers with GHS implementation in your country?

- "Capacity building"
- "Officers of ministries in charge of these questions are not aware and are not skilled for this implementation."
- "Uganda is just drafting the law on chemical management and thus could not implement the GHS at full strength without the legislation"
- "Comprehensibility of the elements."
- "Not having a basic chemical framework/legislation."

Poll 4 Results (N=8)

Do or will the GHS apply to pesticide labels in your country?

Yes: 6
No: 0
I don't know: 2

Question 3:

What needs does your country have to bring in the GHS successfully into legislation? Are there different needs at the national, regional, and global level?

<p>SOUTH AFRICA (Academia)</p>	<ul style="list-style-type: none"> - Need to do more awareness raising. - Emphasis should be placed on raising awareness on GHS labels at a community level in SA. - This could be incorporated into roles of Environmental Health Practitioners because they work with specific communities and are in tune to their specific needs. - They can have programs which first raise awareness on the inherent hazards of chemicals and why they are dangerous for human health and thereafter on the chemical safety practices as listed by the GHS. - If people do not perceive chemicals as dangerous, they will not see the importance of the chemical labels.
<p>NIGERIA (Private Sector)</p>	<ul style="list-style-type: none"> - The best way to reach Nigeria, Ghana, and other West African countries, to implement GHS quickly and effectively, is through ECOWAS. - The regional body will help all the countries within is with the capacity building.
<p>TOGO (Academia)</p>	<ul style="list-style-type: none"> - "Conditional" awareness raising for officers of ministries in charge of environment, health, trade, agriculture is needed. - Conditions could be a project on awareness raising of their populations with the help of traditional chiefs and religious leaders. - CILSS is working on GHS implementation in West Africa.
<p>SOUTH AFRICA (NGO)</p>	<ul style="list-style-type: none"> - Need for awareness raising and training across the SADC region, as currently much of Industry are waiting for local regulations which have been several years coming but now but have not yet been signed off by government. - The Consumer is seeing the GHS labels on mainly imported products, hence awareness raising is needed for the consumer to understand the meaning. - Although first gazetted back in 2007 in SA and the ISO 11014 Standard for GHS compliant Safety Data Sheets was published as a SA National Standard in 2010, many Safety Data Sheets are still MSDS and do not address GHS classification and labelling. - Unfortunately, much of Industry is waiting rather than leading. - Many stakeholders do not understand the technical complexity of the GHS, so there is need for expert knowledge & experience. - Many stakeholders are reluctant to attend training as they think it is simple and they do not need it. - The deadline for SADC GHS implementation of 1 Jan 2020 agreed by Ministers of Trade & Industry in November 2020 has long passed - not helped by Covid19! - Political will would appear to be lacking to support the lead agents in each country to bring policy into regulations.
<p>UNITAR (IGO)</p>	<ul style="list-style-type: none"> - We typically get 30 to 40 participants on each e-learning course, run twice a year. - We see a good presence from the private sector with many companies returning with small groups signing up each time. - That link seems to be getting stronger, so there are more in the private sector gaining skills. - These are across many different countries as well. - The International health regulations and elements of poison control centres could easily be considered to have links to the GHS. - The WHO's chemicals roadmap also includes the GHS. - Focusing on health at the community level would be beneficial.

Poll 5 Results (N=5)

List your country name if you are part of a regional body working on regional GHS implementation?

- South Africa
- eSwatini
- Togo

Poll 6 Results (N=5)

What is the key issue that needs to be addressed in your country for successful GHS implementation?

Fragmented legislation:	2
Major sectors not prioritizing the GHS:	2
Technical skill required missing:	1
No political support:	0

Key resources:

- The GCO-II, UNEP, 2019 - <https://www.unenvironment.org/resources/report/global-chemicals-outlook-ii-legacies-innovative-solutions>.
- The Globally Harmonized System of Classification and Labelling of Chemicals—Explaining the Legal Implementation Gap (Stockholm Environment Institute, 2017) <https://www.mdpi.com/2071-1050/9/12/2176>.

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 chemicalistserver@gmail.com.

If you are not already a member, to join the Chemical Network at:

https://forms.office.com/Pages/ResponsePage.aspx?id=NUNFkk5Wz0ywsCREW4wD9xEG1M2Og-dLiLPIa0l63_JUMk9STUk1OThJVFIzVFdKVktMNIg4TVVHUjQIQCN0PWcu

Disclaimer: The information in this digest represents the opinions of members participating from different stakeholder groups expressed during the discussion. The views expressed in this document do not necessarily represent the opinion or the stated policy of the Swedish Chemicals Agency (KemI) or DEH UCT, nor does citing of trade names or commercial processes constitute endorsement.