



University of Cape Town's

CHEMICALS NETWORK

Issue: 2 of 2021

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Digest Summary of Discussion 2 2021

The Globally Harmonized System of classification and labelling of chemicals (GHS) is often regarded as a fundamental of the sound management of chemicals, applicable to all sectors, health, labour, agriculture, environment, transport, trade, and more. However, the GHS is still not operational in more than 120 countries, mostly developing countries and countries with economies in transition. In their efforts to re-energise GHS activities and commitment considering the preparations for the Beyond 2020 instrument, the co-leads and partners of the Global Partnership to Implement the GHS identified a key opportunity in “Identification of lessons learned and good practices from GHS activities and capacity development projects to identify key determinants which fostered successful GHS implementation, as well as factors impeding success”. This discussion expanded on some of the lessons learned with a specific focus on how they related to advocacy to support implementation and enforcement in countries.

ABOUT THE PRESENTER



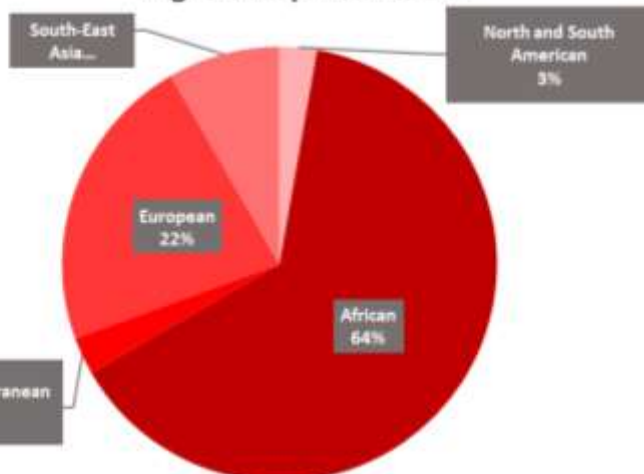
Oliver Wootton is a specialist in UNITAR’s* Chemicals and Waste Management Programme. Over 10 years’ experience working in sustainable development, health, and environment, in Malawi and within the UN. Oliver has led UNITAR’s portfolio on the GHS since 2015, coordinating the GHS e-Learning course, managing 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.

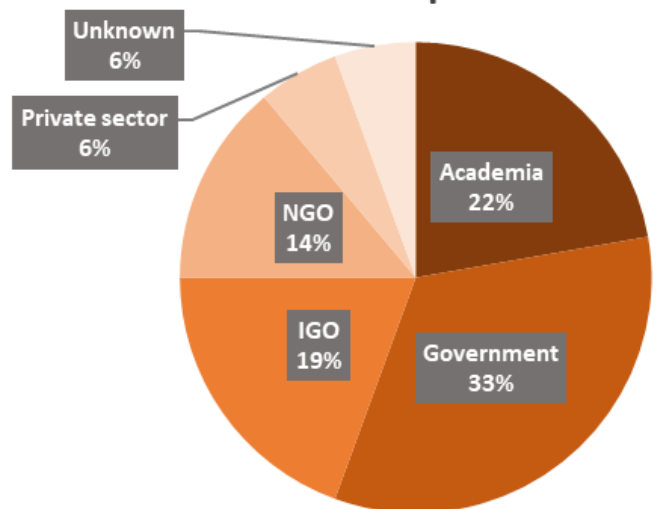
2021 DISCUSSION 2 ATTENDANCE BREAKDOWN

ATTENDEES: 36
Female – 53%
Male – 44%
Unknown – 3%

Regional representation



Stakeholder representation



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

KEY MESSAGES FROM THE DISCUSSION

1. One issue highlighted was the **gap that exists between pesticide labelling and the GHS** and how this is an ongoing challenge, particularly on the local and national level within countries. There is room for improvement and for more work on the GHS in the agricultural and public health pesticide sector.
2. The **need for training and awareness raising for GHS at country level** continues to be an issue raised and needing broader attention to cover more countries.
3. It was highlighted that **understanding of what a socio-economic assessment is was challenging** and that this could be an area of work and clarification. In the lessons learnt report it was clear that multiple analyses need to be done throughout the process of bringing GHS into national legislation. This involves engaging with stakeholders and raising awareness in different sectors as well as promoting the different angles and benefits of the GHS including health, socio-economic and economic benefits. **Training on socio-economic assessment and virtual workshops are needed.**
4. In the GHS dialogue, it is often spoken about that **implementation** around the world needs to improve, but a subsequent step of **enforcement is not often focused on**. It is **important to see how enforcement can be improved for GHS too**. There are some good guidance documents on sustainable financing and enforcement of the GHS. An important contributor to enforcement is the presence of strong legislation that provides the tools for enforcement. Enforcement can be difficult to work on, but it is an area where support for countries can improve.

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:

What have you or others in your country/organization been involved in to encourage commitment to and/or support for implementing the GHS?

How have you been able to raise awareness and maintain it? Please give details

BOTSWANA	<ul style="list-style-type: none"> - Botswana is in the process of developing a comprehensive Chemicals legislation which will cover GHS. - There have been some public awareness campaigns.
ESWATINI (Government)	<ul style="list-style-type: none"> - Awareness is hard as there are few people with the capacities on GHS in Eswatini. - More focus is on the control of ODS. - One of the GHS hazards is "Hazardous to the ozone layer" and may be an entry point where the focus is on ODS. - The Environmental Health Department in collaboration with Customs has had trainings with the little knowledge obtained to raise awareness. - They now have port health officials at the borders. - No clear tools or legal framework in support of the activities to be carried out in the implementation. - Eswatini has a labelling system and some equipment for testing but it is not sufficient.
IRAN (Academia)	<ul style="list-style-type: none"> - Usually, Ministry of Foreign affairs deals with the GHS, not the public. - There are many academic studies about GHS. - There is a survey done among three Iranian Occupational Groups that explores General Knowledge of Chemical Safety and Familiarity with GHS and Outdated Labelling Systems. - There is development and validation of two awareness and status assessment questionnaires for the hazardous chemically exposed staff though GHS.
KENYA (Government)	<ul style="list-style-type: none"> - There is a draft GHS manual for pesticides. - Meetings have been held with the industry on its implementation.
MADAGASCAR (Government)	<ul style="list-style-type: none"> - A situational analysis of the GHS has been completed but there is still no implementation. - Currently partners are needed for the implementation of project and training.
SIERRA LEONE	<ul style="list-style-type: none"> - There is a need for training in GHS and awareness raising.

(Government)	
SOUTH AFRICA (Academia)	<ul style="list-style-type: none"> - At the University of Cape Town, we have been involved in training on the comprehension of the GHS pictograms and assessing how to promote understand of the 9, not always understood, pictograms. - Many people would like training on the GHS, including people not involved in regulation.
VENEZUELA (Private sector)	<ul style="list-style-type: none"> - ASOQUIM coordinated the development of technical standards for the implementation of the GHS and promoted workshops for companies.
ZIMBABWE (NGO)	<ul style="list-style-type: none"> - There has been some discussion on various platforms with FAO and Regulatory Authority on the need to introduce GHS. - There is a lot of reluctance from most stakeholders as they feel that the local system of using triangles and colour coding is so well known by everyone including primary school pupils and rural farmers.

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 = 5)

If the GHS is not implemented in your country, how can you help to generate commitment to the GHS?

“Through awareness and training mostly in companies exposed to chemical substances. Most companies in SA are not familiar with what GHS is and what it entails.”

“Working through regional bodies like the Southern African Pesticide Regulators Forum (SAPReF) is key.”

“Coordination with the different stakeholders. Elaboration of Technical Norms, Dissemination of the EMS through workshops and courses”

“It is partly implemented in Iran and I am always trying to bring these issues up in conferences etc... and am doing my part, also DoE in Iran may deal with GHS.”

“All stakeholders from government and NGO and IGO cooperate together for GHS. Ministry of Industry plays leading role to do this. All chemicals’ importers, end users, official from Ministry of Environment, Ministry of Transport are working together.”

Poll 2 Results (N = 7)

What committees and/or forums do you have in place that coordinate planning for and implementation of the GHS? Put NONE if there are not any.

“Sierra Leone do not have any such committee.”

“Institutional-lead (Regulatory).”

“No clear information so far.”

“In Iran, the Ministry of Agriculture, the Ministry of Health and the Ministry of Foreign Affairs have committees, and some Government offices may also have.”

“Presidential Chemical Safety Commission and ASOQUIM’s Responsible Care Program.”

“South Africa: Multistakeholder committee in chemicals management (MCCM).”

“The discussion on harmonization is a good starting point where the advantage of understanding the classification beyond our borders could impact on mind set and shift the perspectives.”

Question 2:

What types of analyses have been or would be useful to undertake, to help you make the case for (enhanced) implementation of the GHS and why?

IRAN (Academia)	<ul style="list-style-type: none"> - A comparison study of perception towards Chemical Hazard Warning Signs in Old and Globally Harmonized System (GHS) among chemical workers in Shiraz, Iran. - A review of GHS related published works from Academics and also government agencies has also been done in Iran.
SOUTH AFRICA (Academia)	<ul style="list-style-type: none"> - At UCT, we used to be involved in global comprehensibility testing of the GHS and it seems to be a useful tool for bringing awareness to 1) the system and 2) how training workers and consumers is key.
SWEDEN (Government)	<ul style="list-style-type: none"> - One kind of situation when you require a cost-benefit analysis is when you go from an existing system to one based on GHS (a transition, e.g. as in EU). - Another kind is when you lack a system for classification & labelling in your legislation and introduce something that is presently lacking.
INTERNATIONAL LABOUR ORGANISATION (IGO)	<ul style="list-style-type: none"> - While not speaking from the national perspective (rather that of an international org), the mapping of stakeholders and competent authorities for GHS implementation and oversight may be a useful analysis to undertake.
ZIMBABWE (NGO)	<ul style="list-style-type: none"> - Trade analysis on both a regional and international level would help.
PRESENTERS COMMENTS:	<p>Question: Generally, from your experience, how long have socio-economic assessments (cost-benefit analysis) taken and are they resource intensive?</p> <ul style="list-style-type: none"> - There have not been many done so it is difficult to say how long it would take. - The South African one that was recently done took a couple of years to complete. - It is a process that requires a high level of engagement and discussions, which may take a fair amount of time. <p>Question: Could you please explain about Socio-economic assessment?</p> <ul style="list-style-type: none"> - A cost-benefit analysis is often used when a system is changed to a system based on GHS. It involves identifying what the costs of this change would be and what the benefits would be. - It can also be used when determining what costs and benefits would be involved in implementing a system based on GHS in countries where such a system does not exist yet.

Poll 3 Results (N = 12)

To bring in new legislation, would your country have to undertake a cost-benefit/socio-economic analysis?

Yes: 92% (11)

I don't know: 8% (1)

Poll 4 Results (N = 14)

Would a dedicated guidance for a GHS cost-benefit/socio-economic analysis be useful?

Yes: 100% (14)

Question 3:

How does the GHS enforcement regime work in your country or the country you work in?
If the GHS is not in place, do you have any enforcement programmes that can be leveraged or modified for the GHS?

BOTSWANA	<ul style="list-style-type: none"> - GHS enforcement is done through pesticides registration and inspection through the Ministry of Agriculture. - Chemicals clearances for household, industrial and pesticides of public health importance is done by Ministry of Health and Wellness
BOTSWANA (Government)	<ul style="list-style-type: none"> - Botswana has different departments managing chemicals. - There has been work done on the overarching legislation to cover all sectors (agriculture, public health, and industrial chemicals). - Implementation stage has not yet been reached.
ESWATINI (Government)	<ul style="list-style-type: none"> - Eswatini Environmental Authority and the Ministry of Agriculture have a draft bill to be tabled in parliament. - Stakeholders have different interest.
IRAN (Academia)	<ul style="list-style-type: none"> - Assessment of awareness and comprehension of chemical hazard symbols among chemistry students has been done: http://www.mdpi.com/2071-1050/9/12/2176/s1
MYANMAR (Government)	<ul style="list-style-type: none"> - Import and sale of pesticides into Myanmar requires that it be labelled and described with GHS classifications. - If not, it would be rejected for import or sale. - Enforcement for GHS has been implemented throughout the pesticide registration process. - Pesticides fall under Agricultural Authorities and industrial chemicals under industrial authorities.
SOUTH AFRICA (Academia)	<ul style="list-style-type: none"> - Countries need to reflect on what current enforcement is in place for assessing chemicals labels and hazard classification. - Multi-sector collaboration on enforcement is challenging as each inspectorate has a different mandate from different government departments.
SWEDEN (Government)	<ul style="list-style-type: none"> - An even more fundamental question is: does your country have legal requirements for labelling of chemicals? If so, what chemicals (detergents, pesticides, pharmaceuticals...)? - Inspectors need "teeth sharpened by legislation".
ZIMBABWE (NGO)	<ul style="list-style-type: none"> - The GHS system is not in place in Zimbabwe; however, the existing system can be modified but would need some time to make sure the system is well understood across the board. - The education system, extension system and chemical industry (CropLife Zimbabwe) all have training programmes that has to do with chemical use. - It would be important to start by linking the current system with the GHS system as gradual change is initiated and then progresses.

Poll 5 Results (N = 4)

What innovative ideas could be used to enhance enforcement?

"Digital labelling for the purpose of inspection."

"Awareness through enforcement to the relevant stakeholders to implement heavy fines for violation."

"Mobile team of chemicals control committee will reach on the ground."

"Allow the public or workers to take photos of labels and submit them online or through a message to the regulating body."

Poll 6 Results (N = 10)

Do you have a multi-sector chemicals enforcement programme in your country?

Yes: 40% (4)

No: 60% (6)

Key resources:

- **GCO-II, UNEP, 2019:**
<https://www.unep.org/resources/report/global-chemicals-outlook-ii-legacies-innovative-solutionsEU>
- **Webpage of the Global Partnership:**
<https://unitar.org/global-partnership-implement-ghs>
- **FAO guidance - Guidance for inspection of pesticide producers, importers, distributors, and retailers**
<http://www.fao.org/3/cb1194en/cb1194en.pdf>
- **UNEP guidance - Enforcement of Chemicals Control Legislation**
<https://wedocs.unep.org/handle/20.500.11822/28402>
- **Kemi guidance - Enforcement of legislation on chemicals placed on the market**
<https://www.kemi.se/en/publications/guidance-on-national-chemicals-control-for-other-countries/enforcement-of-legislation-on-chemicals-placed-on-the-market>

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/Pages/ResponsePage.aspx?id=NUNFkk5Wz0ywsCREW4wD9xEG1M2Og-dLiLPia0l63_JUMk9STUk1OThJVFiZVFdKVktMNIg4TVVHUiQIQCN0PWcu

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.