



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

Forty-second session

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Item 3 (d) of the provisional agenda

Implementation of the Globally Harmonized System of Classification and Labelling of Chemicals: miscellaneous

Activities to support the implementation of Globally Harmonized System of Classification and Labelling of Chemicals

Transmitted by the expert from Sweden*

Background

1. The expert from Sweden submitted informal document INF.4 to the forty-first session of the Sub-Committee in December 2021 with information on activities to support Globally Harmonized System of Classification and Labelling of Chemicals (GHS) implementation in low- and middle-income countries, conducted by the Swedish Chemicals Agency, within the framework of development cooperation projects.
2. The background to the paper was to highlight that promotion of the implementation of the GHS system also lies within the mandate of the Sub-Committee, in addition to work on regular revisions and updates of the GHS. In the foreword to the GHS, paragraph 6 states that: *“The GHS Sub-Committee is responsible for maintaining the GHS, promoting its implementation, and providing additional guidance as needs arise, while maintaining stability in the system to encourage its adoption.”*
3. While not defined in the text, adoption can generally be considered as including the GHS in national legislation. This should include clearly defined roles and responsibilities for authorities and industry.
4. The expert from Sweden proposed to the Sub-Committee to explore how promotion and monitoring of GHS implementation worldwide can be further supported. There was general support for this proposal and the expert from Sweden was invited to develop a proposal for consideration by the Sub-Committee on possible ways forward.
5. With this document, the Swedish expert would like to propose questions for discussion and actions that can be taken by the Sub-Committee on this issue.

* A/75/6 (Sect.20), para. 20.51

Topics for discussion

6. The expert from Sweden invites the Sub-Committee to reflect upon the following topics:

- (a) Implementation of GHS could mean anything from fostering political commitment, developing a legal framework and enforcement mechanisms, to ensuring that duty-holders are fulfilling their obligations.

What does “promoting the implementation of GHS” mean to the Sub-Committee in terms of activities required to make the system operational in a country?

- (b) There may be a number of different drivers for a country which intends to implement GHS, e.g. environmental and health benefits, membership of regional or economic associations or facilitation of trade.

According to the Sub-Committee’s experience and views, what are the most important drivers for a country to implement GHS? Are there relevant entities (such as regional associations or the World Trade Organization) that the Sub-Committee should seek to engage with directly?

- (c) The existing standing agenda item on capacity building gives the Sub-Committee participants a possibility to inform each other about capacity building activities.

(i) To what extent can this agenda item be used for participants to both inform each other but also share more detailed experiences of the results of conducted activities and discuss planned initiatives? To what extent can this agenda item also be used to explore the possibility to conduct joint initiatives and to invite other bodies or entities that are not officially part of the Sub-Committee to assist in the implementation of these activities?

(ii) Sub-Committee’s focal points may not come from departments, agencies or entities that have international development budgets or objectives. To what extent can Sub-Committee members commit to engaging with their domestic stakeholders to support capacity building directly, with the Sub-Committee’s focal points for GHS capacity building activities, namely ILO and UNITAR, or with other entities that engage in international capacity building?

- (d) Agenda item “Implementation of the GHS” includes reports on the status of implementation.

Could this agenda item be used for a joint discussion of the result of surveys and reports (e.g. the compilation made by Cefic on global implementation status) to enable an analysis of the pace at which GHS is being implemented?

- (e) The two-year cycle of revising the GHS means that countries are constantly struggling to keep up with implementing new versions and are out of pace with each other so that global harmonisation is never reached.

Would it be worthwhile to better take this aspect into consideration in the future work?

- (f) At the forty-first session of the Sub-Committee in December 2021 it was noted that there had previously been a GHS implementation issues working group, which could be revived. The group was set up following the discussions held during the 13th session of the Sub-Committee. The work, initially lead by Australia, focused on issues related to a harmonized approach when implementing GHS and continued for many years. Then around 2010 or 2011 the expert from Australia left the Sub-Committee and the work stopped as no other delegations volunteered to take up the work. What is the view of the Sub-Committee on resuming this work within an informal working group, with a

focus on increased GHS implementation; or would the proposal to give this issue more attention in the plenary sessions of the Sub-Committee suffice?

Proposal for actions

7. The expert from Sweden invites the Sub-Committee to consider the following actions to be taken to further support the promotion and monitoring of GHS implementation worldwide:

- (a) Include a summary of the discussions from the Program Advisory Group (PAG) on the agenda for the Sub-Committee sessions with a possibility for the Sub-Committee to reflect upon the results.
- (b) Include under the Sub-Committee's agenda item on Capacity building (or add a new agenda item) where information received on experience and results from different types of activities with the aim to promote the implementation of GHS are analyzed, shared, and discussed. This agenda item could include an update from the discussions of the Global Partnership to Implement the GHS (the ILO, OECD and UNITAR as co-leads) and the identification of synergies between the Partnership and the activities of the Sub-Committee.

Examples of activities could be for instance support to countries in their work on advocacy activities, on development of legislation (including provisions on classification and labelling according to the GHS), trainings to make the system operational or workshops with different stakeholders, surveys, questionnaires, development of training materials and a GHS learning center for countries and parties that would be interested in working on GHS activities. To make it possible for the Sub-Committee to follow the development, this should perhaps be done on a regular basis.

- (c) Engagement in the SAICM Beyond 2020¹ process to ensure coverage of specific targets related to GHS implementation globally and adequate indicators including robust follow up mechanisms that could include information on the degree of the countries' implementation (e.g. sectors included). For reference, the current, proposed draft target under the Beyond 2020 process is:

“By 20XX (target year to be decided), all governments have legally implemented and enforce the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS) in all.”

¹ Strategic Approach and sound management of chemicals and waste beyond 2020.