UN/GHS-SC/1/INF.7

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals
(First session, 9-11 July 2001, agenda item 7)

IMPLEMENTATION

Assisting Countries to Develop and Implement Chemical Hazard Communication and GHS Action Plans

A UNITAR/ILO/IOMC Training and Capacity Building Programme

2001-2003

Information Note

(28 June 2001)

UNITAR

IOMC

INTER-ORGANIZATION PROGRAMME FOR THE SOUND MANAGEMENT OF CHEMICALS

A cooperative agreement among UNEP, ILO, FAO, WHO, UNIDO, UNITAR and OECD

Background

1. An integral aspect of advancing the sound management of chemicals is the development of an effective national system through which chemical hazards are communicated to workers, consumers and the public. The importance of chemical hazard communication has been highlighted in various international initiatives and agreements, including the International Labour Organization (ILO) Chemicals Convention 170, Chapter 19 of Agenda 21, and the Intergovernmental Forum on Chemical Safety (IFCS). Additionally, as a result of National Profile preparation and the organisation of national priority setting workshops with assistance from the United Nations Institute for Training and Research (UNITAR), chemical hazard communication has emerged as a key priority in many developing countries and countries with economies in transition. A 1998 IFCS/UNITAR survey indeed revealed that a majority of countries regard awareness-raising and chemical hazard communication as one of the top priorities for chemicals management. Consistent with this result, some 120 participants at a 1999 IFCS/UNITAR/Inter-Organization Programme for the Sound Management of Chemicals (IOMC) thematic workshop on chemicals legislation recommended that elements of chemical hazard communication should be considered as a priority by countries when developing or strengthening national legislation for the sound management of chemicals.

Benefits of Chemical Hazard Communication

2. The basic goal of hazard communication is to ensure that employers, employees and the public are provided with adequate, practical, reliable and comprehensible information about the hazards of chemicals so that they can take effective preventive and protective measures for their health and safety. An effective hazard communication system entails benefits and possible uses for governments, industries, workers and members of the public. If successful, it can make a significant contribution towards reducing the incidence of chemical-related illness and injuries. Chemical hazard communication can thus be considered as a prerequisite for achieving sustainable economic and social development.

3. The two main tools of chemical hazard communication are labels and chemical safety data sheets. They may be complemented by other measures, such as awareness-raising campaigns or educational materials. The main challenge associated with hazard communication is to convey the message in a form that is understandable to the various users of chemical substances.

Recent Developments at the International Level

4. The Globally Harmonized System for the Classification and Labelling of Chemicals (GHS), elaborated by the ILO, the Organisation for Economic Co-operation and Development (OECD) and the United Nations Committee of Experts on the Transport of Dangerous Goods (UNCETDG) under the umbrella of the IOMC, provides a comprehensive and universal tool for chemical hazard communication. A new UN Economic and Social Council (ECOSOC) Sub-Committee of Experts on the GHS, responsible for its maintenance, updating and promotion, begins meeting in 2001. Developing countries and countries with economies in transition, while benefiting from these developments, are likely to face particular challenges in implementing this new global standard.

5. In October 2000, the third session of the IFCS (FORUM III) highlighted the harmonization of classification and labelling of chemicals as a Priority for Action beyond 2000. In particular,

the IFCS agreed that "guidance and other tools necessary for the implementation of the GHS should be made available to interested parties prior to Forum IV. All countries are encouraged to implement the GHS as soon as possible with a view to have the system fully operational by 2008". As a contribution to FORUM III discussions, UNITAR and ILO tabled a paper outlining potential elements of a global GHS capacity building strategy, comprising global and regional awareness-raising as well as country-based GHS capacity building activities.[1] This information note provides more details regarding support for the development of country-based hazard communication initiatives.

Programme Overview and Objectives

6. The programme will assist countries to develop and implement chemical hazard communication action plans though collaboration between various government bodies as well as parties outside of government, taking into account relevant international tools such as the GHS. The programme will include the provision of guidance documents, training materials, and training by experts from international organisations, countries and other interested parties. Relevant activities will cover topics such as classification of chemicals, labelling, safety data sheets (SDSs), as well as related support measures such as legislation, awareness-raising, etc.

7. The programme will take into consideration the need for stakeholder co-operation in implementing chemical hazard communication activities at the national level. It is proposed to make use of national co-ordinating committees which have been established in many countries through the preparation of National Chemicals Management Profiles, as called for by the IFCS. These mechanisms provide useful points of entry to catalyze national chemical hazard communication awareness-raising activities and to initiate the development of a co-ordinated action plan. At the same time, National Profiles can provide a good starting point for conducting a more in-depth assessment of countries' national legal, institutional, administrative and technical infrastructure related to chemical hazard communication. Some eighty-five countries have already prepared, or are in the process of preparing, a comprehensive National Profile through multi-stakeholder collaboration in accordance with the UNITAR/IOMC National Profile Guidance Document.[2]

Implementation of Country Level Projects

8. Recognising that the full implementation of effective hazard communication strategies in less developed countries will be a long-term undertaking, the following three-phase approach is proposed for countries to begin to take systematic action. Project resources will mainly support Phase 1 and 2 activities in countries, in line with the basic principle of the project to be catalytic in nature. In the long run, implementation of chemical hazard communication activities (Phase 3) should be embedded through sustainable national action. The following sections provide an overview of each project phase.

PHASE 1: NATIONAL AWARENESS RAISING, SUBSTANTIVE TRAINING AND SITUATION ANALYSIS

[1] This paper is available at http://www.unitar.org/cwm/homepage/b/ghs/

[2] More detailed information regarding National Chemicals Management Profiles can be found at: http://www.unitar.org/cwm

9. Activities undertaken in Phase 1 aim at facilitating a better understanding among all interested and affected parties at the national level about the opportunities and challenges related to chemical hazard communication. These activities serve the objective of setting the stage for developing a national action plan in Phase 2. It is therefore considered important that basic training and awareness-raising activities regarding key issues of chemical hazard communication are undertaken at this time.

10. Activities include the organisation of a high-level national awareness-raising workshop for decision-makers, complemented by the provision of training on various aspects of chemical hazard communication. Partner countries are encouraged to ensure broad participation in the hazard communication initiative by establishing a Task Force comprised of representatives of various stakeholder groups. Members of these groups will work together to undertake the activities and tasks involved in developing the chemical hazard communication action plan.

11. During Phase 1, partner countries will also be assisted to identify and assess their infrastructure and available national expertise relevant to hazard communication (a "situation analysis"). This national assessment will include a review of: relevant legal and regulatory frameworks; institutional, administrative and technical capacities; and on-going and planned hazard communication activities of governments, agencies, industry, public interest groups and other relevant organisations. It is also expected to identify gaps or weaknesses in the current national infrastructure and may provide insight into potential challenges, as well as opportunities, in the area of chemical hazard communication. This important document will help to catalyse informed and co-ordinated action during the strategy development phase.

PHASE 2: STRATEGY DEVELOPMENT

12. During Phase 2, partner countries will be supported to develop a chemical hazard communication action plan. If well prepared, the action plan – which would essentially be the result of multi-stakeholder strategy formulation exercises – can also become a powerful tool to mobilise national and external resources for medium and long-term implementation activities.

13. Key questions addressed by partner countries during this Phase include, for example:

- What will be the division of responsibility among different competent authorities?
- How and to what extent can industry, labour organisations and other interested groups assist in providing chemical hazard information?
- How will universities have an input in the process (e.g. occupational safety and health curricula, research, education, validation of data, etc.)?
- Should use of labels and SDSs be legally-binding or voluntary?
- Is there a need to develop a new law or is the existing legal framework sufficient to accommodate issues of chemical hazard communication and GHS implementation?
- What additional national measures should countries consider in developing a national hazard communication strategy?
- Which organisations can play a role in providing training for chemical hazard communication? What is the role of industry in this context?
- How will labels and SDSs be produced and by whom?

- How can internationally available information (e.g. International Chemical Safety Cards (ICSCs)) be made more easily available to those involved in the daily operation of chemical hazard communication?[3]
- What additional activities/measures are required beyond labelling and SDSs (e.g. posters, brochures, and use of the media)?
- What are the financial and human resource implications of the different options and activities that are being considered?
- What activities can ensure the long-term sustainability of the strategy?

14. One important activity during this phase may be national testing of the comprehensibility of written and graphic hazard warning symbols.[4] The results of such testing could provide a basis for ensuring that chemical hazard communication measures are well understood by the target audience and are likely to lead to behaviour changes that ensure protection from dangerous chemicals.

PHASE 3: FROM STRATEGY DEVELOPMENT TO IMPLEMENTATION

15. Phase 3 will provide some limited support to catalyse implementation of measures as agreed in the action plan. It is important to recognise that national commitment should gradually lead to an effective and sustained system for chemical hazard communication in the medium and long-term. The international goal for full national implementation of the GHS, for example, is 2008; countries may want to consider this as a possible target.

16. Potential activities during the implementation phase depend on decisions reached through the strategy development phase and may include, for example:

- training courses for government personnel, workers and others who are at risk of exposure to hazardous chemicals;
- workshops on chemical labelling and SDS preparation in relevant sectors;
- development and use of complementary hazard communication tools such as brochures, posters, etc.

Assistance Provided to Partner Countries

17. UNITAR/ILO, working closely with interested parties at the international level, will provide partner countries with guidance, training and grant support to catalyse a co-ordinated and systematic process at the country level to strengthen chemical hazard communication. A guidance document to assist the step-by-step process of developing a national hazard communication action plan will be made available following pilot testing (see below). This guidance will also assist countries in preparing a chemical hazard communication situation analysis and in considering key decisions which need to be taken in the context of a chemical hazard communication action plan. Supplementary education and training material will be prepared, for example, on topics such as: What is Chemical Hazard Communication?, Tools for Chemical Hazard Communication (e.g. modules on SDSs and labelling), etc.

[3] ICSCs are currently available in 13 languages on the internet at: http://www.ilo.org/public/english/protection/safework/cis/products/icsc/ and http://www.cdc.gov/niosh/ipcs/icstart.html#legal.

[4] A draft manual on comprehensibility testing methodology for chemical hazard communication created by the University of Cape Town will soon be available via the ILO.

Collaboration at the International Level

18. Capacity building and training in the area of chemical hazard communication and GHS implementation can benefit from a vast array of expertise and resources available through international organisations, countries, industry, labour groups, universities and other interested parties. UNITAR and ILO invite all these groups to explore ways and means to work together to ensure that existing specialised expertise and guidance is made available to partner countries in a co-ordinated and integrated way. To this end, the June 2001 meeting of the Inter-Organization Coordinating Committee (IOCC) of the IOMC welcomed the establishment of a programme advisory group of interested organisations and individuals through which concrete partnerships will be developed and implemented.

Initiation of Pilot Projects

19. In order to take advantage of the time prior to the formal adoption of the GHS, it is anticipated that country-based pilot projects will be initiated in 2001, subject to available funding. These pilot projects could provide an important testing ground to review draft-versions of chemical hazard communication and GHS-related guidance and training material, as well as provide important feedback to the international community regarding opportunities and challenges associated with GHS implementation in developing countries and countries with economies in transition.

Resource Issues

20. The international community needs to recognise that the introduction and implementation of sound chemical hazard communication strategies and the GHS in developing countries and countries with economies in transition is likely to require a significant amount of external assistance, at least during the early phases of introducing the system. However, in light of the potential benefits of effective chemical hazard communication and implementation of the GHS in terms of protecting human health and the environment and facilitating the free trade of chemicals, the costs of GHS capacity building activities should be considered well worth the investment.

For additional information, please contact:

Training and Capacity Building Programmes in Chemicals and Waste Management United Nations Institute for Training and Research (UNITAR) Palais des Nations CH-1211 Geneva 10 Switzerland FAX: + 41 22 917 8047 Email: cwm@unitar.org	International Labour Office (ILO) 4, route des Morillons 1211 Geneva 22 Switzerland FAX: +41 22 799 6878 Email: safework@ilo.org

_____