

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

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IMPLEMENTATION OF THE GHS

Reports from Governments or organizations

Status of national activities in South Africa on GHS implementation

Submitted by the Expert from South Africa

A study into the implications of implementing the GHS and the development of an implementation strategy for South Africa was concluded in December 2003. As part of this study an implementation plan was done under the auspices of the National Economic Development and Labour Council (NEDLAC) and co-funded and supported by UNITAR. At NEDLAC, government, organised business, organised labour and organised community groupings discuss, on a national level, issues of social and economic policy and try to reach consensus on such issues.

In terms of the NEDLAC agreement, South Africa sees the implementation of the GHS as part of its chemical management system. Although currently fragmented, almost all the elements of the infrastructure for the sound management of chemicals are in place in South Africa. The following areas will be addressed:

1. Legislation

Review of legislation or policy instruments to ensure alignment with GHS requirements, which will be incorporated in South African legislation by means of a national standard.

Establishment of an interdepartmental committee by the Department of Labour to develop a co-ordinated legislative implementation strategy to ensure elimination of overlap of jurisdictional mandates.

Development of a harmonised legislative implementation strategy that will include compliance and enforcement requirements, appropriate budget allocations, support to industry for the transition and the establishment of a permanent approach to ongoing input into international discussions and alignment of the effective dates of all legislative amendments.

2. Training

GHS training will form an integral part of the safety, health and environment (SHE) unit standards currently being developed by a Working Group established by the Chemical Industries' Education and Training Authority (CHIETA). The training issues raised in the implementation strategy should be referred to the SHE Unit Standard Working Group.

GHS elements will form an integral part of a program of accreditation of Health, Safety and the Environment (HSE). Specific courses to empower workers in understanding the elements of GHS within a specific

Occupational Health and Safety focus should be developed.

Trade union participation is crucial for the successful implementation of the GHS. Thus, Unions will have to include GHS elements in their shop steward and member training. This will require additional resources being made available to the Unions as a matter of urgency.

3. Awareness raising

Awareness programs to be developed as successful implementation of the GHS will require significant efforts to raise awareness.

4. Testing facilities

A strategy will be developed to increase the availability of test methods. Laboratories and potential service providers for the testing of substances for health hazards and hazards to the environment will be encouraged to become accredited; mutual recognition agreements will be pursued.

5. National Committee on Chemicals Safety and Management

South Africa has established a National Committee on Chemicals Safety and Management (NCCSM). The aim of this Committee is to:

- (a) bring all the relevant stakeholders together and develop a national position to take to the United Nations GHS- and TDG-subcommittees, Strategic Approach to International Chemicals Management (SAICM) and OECD Chemical Committee meetings;
- (b) take active part in the work and decisions of the OECD Chemical Safety Programme and to disseminate information to interested or affected parties;
- (c) have early warnings of potential technical barriers to trade; and
- (d) align national activities with international trends to facilitate trade and the protection of the South African consumer and environment.

A regulatory subcommittee was also established to monitor progress on the national implementation of GHS.

6. National GHS standard

Standards South Africa, a division within the South African Bureau of Standards (SABS) has developed a draft South African National Standard on GHS that will be referred to in the above-mentioned legislation. A draft standard is currently out for comment. This standard will be completed by middle 2006.

7. Implementation date

It has however become clear that South Africa will not meet the 2008 deadline for implementation of the GHS and will make provision for a transition period in the relevant national legislation. This will have to be aligned with international timelines.

South Africa is not a primary producer of safety data and the alignment of SDS's with the GHS will be a time consuming exercise for industry.
