
**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

Initiative for the introduction and implementation of the GHS

Transmitted by the expert from Japan

Background

In response to the recommendation made by the United Nations and the agreement endorsed at an APEC meeting, the Japanese Government has started a series of national projects for the implementation of the GHS. These projects have been initiated in 2001 and cover both domestic and international activities. This paper introduces an outline of the projects.

Domestic activities

1. Establishment of the inter-ministerial committee

Around the same time as the United Nations Sub-Committee of Experts on the GHS was established, an inter-ministerial committee was organized in 2001. Its original objectives and tasks were to share information about the GHS among ministries and to play a pivotal role in the UN-Subcommittee. Seven government offices¹ and experts from national laboratories and industries participated in the inter-ministerial committee.

The inter-ministerial committee's activities include:

- (a) the translation of the GHS into Japanese ;
- (b) Information sharing among ministries with respect to the relevant domestic laws;
- (c) The classification of chemicals under each relevant domestic law;
- (d) The deliberation on the agenda items and documents of the UN Sub-Committee meetings and decision-making about the Japanese position on them.

*1 Ministry of Health, Labour and Welfare (MHLW)
Ministry of Economy, Trade and Industry (METI)
Ministry of the Environment (MOE)
Ministry of Internal Affairs and Communications (MIC)
Ministry of Agriculture, Forestry and Fisheries (MAFF)
Ministries of Land Infrastructure and Transport (MLIT)
Ministry of Foreign Affairs (MOFA)*

2. Translation of the GHS into Japanese

The translation of the GHS into Japanese started at the very beginning of the national projects (February 2002), since the Japanese version was considered to be an indispensable tool for the implementation of the GHS.

The inter-ministerial committee acted as an organizer for the work on the translation. The committee recognized at that time that the GHS would become a basic concept for the future management of chemicals. The committee was also aware of the fact that technical terminology in the GHS should be harmonized because there were several inconsistent uses of the terms among the Japanese laws. The translation was performed by government offices, chemical industries, experts from academia and national/public laboratories, sharing their expertises.

The work on the translation into Japanese brought an unexpected benefit. Government officers engaged in the work became familiar with the concept of the GHS. In the meantime, they identified similarities and differences between the current Japanese law and the GHS. Through this work, gap analysis was also accomplished.

The Japanese translation of the GHS (with the exception of the Annexes) was completed in March 2004. It took two years because of harmonization of technical terminology and some uncertainties contained in the GHS. The inter-ministry committee made a great effort to choose the most relevant Japanese terms and tried as precise Japanese translation as possible.

The Japanese version of the GHS is available at the MHLW, METI and MOE homepages.

The translation of the first revised version of the GHS into Japanese will be accomplished soon.

3. Gap analysis between the GHS and current Japanese laws

All differences between current Japanese laws and the GHS, with respect to the classification and labelling of hazards were analysed and listed.

Chemicals which are regulated under the current single or duplicate Japanese laws were identified.

4. Activities in each ministry for the introduction and implementation of the GHS (Chemicals regulation law)

(a) The Industrial Safety and Health Law aims to secure workers' safety and health at their workplace. SDS's are required to be issued for certain kind of chemicals. GHS was introduced into this system in October 2005.

(b) The Poisonous and Deleterious Substances Control Law regulates chemical products containing toxic or corrosive substances. The law requires labelling on products, proceeding towards implementation of the GHS. In December 2005, MHLW started recommending industries to voluntarily correspond GHS labelling through distribution of pamphlets.

5. Development of Safety Data Sheets (SDS's) under the Japanese Industrial Standards (JIS)

In Japan, SDS's are used in accordance with ISO. Taking into account the expected future amendments of the corresponding laws, the SDS format under the JIS will be revised according to the GHS. The revised SDS under the JIS will be opened his month.

JIS is a set of national standards and the Japanese Industrial Standards Committee is responsible for it. Therefore, flexible revisions are possible in the event of any changes made in the GHS. Given the difficulties concerning law revisions, each law can refer to the JIS and does not need to be revised.

6. Development of JIS concerning the labelling methods

Under current Japanese laws, there are no standard pictograms regarding hazards. In addition, no JIS have been developed for hazards to date. Activities for the development of JIS, in which standard labelling methods corresponding to GHS are described, are ongoing.

It is expected that the JIS will not only make clear, but also promote the harmonization of the labelling methods concerning hazards.

7. Classification of 1,500 chemicals which are regulated under the current laws

In Japan, MSDS are required for approximately 1,500 chemicals which are regulated under the current laws. MHLW, MAFF, METI and MOE decided to implement classification of these chemicals as a joint project, aiming to help industries issuing MSDS. The results of the projects are not compulsive and allow industries to use their own data and classify chemicals on the basis of their own judgement. Classification results will be made publicly available before the middle of 2006. In the beginning of October 2005, the inter-ministerial committee published the tentative results of 11 chemicals and invited the public to make comments on the browsing style of the results. The final results will be opened through the websites including the National Institute of Technology and Evaluation (NITE).

The classification work is performed by experts from laboratories and industries and the results can be checked by the members of the inter-ministerial committee.

8. Development of the GHS classification manual

Upon the initiation of the classification of 1,500 chemicals, a GHS classification manual for the joint project has been developed. The main objective of the manual is to facilitate the classification of the 1,500 chemicals within the limited time schedule, and to eliminate any different classification results among experts.

One of the unique points of the manual is that it allows users to refer to only reliable data sources for the classification of hazards, such as those peer-reviewed by international authorities, and an original scientific paper is not generally used. This enables industries to avoid trouble in checking the peer review of the international organization in their voluntary classification.

The GHS classification manual is also published via NITE's homepage².

9. Miscellaneous activities for the spread of GHS

For the public campaign of the GHS, several ministries and organizations have developed a series of pamphlets.

Many training courses concerning chemical management are being held in Japan. Seminars on GHS and workshops focusing on the classification of chemicals have also been held recently. Participants in these seminars and workshops are those in charge of safety hygiene, chemical risk managers, those in charge of labelling of consumer products, policy makers, staff in labour standards inspection offices and scientists, and have reached several thousands.

² <http://www.safe.nite.go.jp/ghs/index.html>

In addition, several research and development projects, so as to follow the international GHS activities, are ongoing. The following are some examples:

- (a) Investigation of the public awareness of the GHS:
- (b) R&D of the better information transmission for the blind people:
- (d) Investigation of the necessary experiences and knowledge for the production of the labels:
- (e) R&D of a computer programme as an education tool for the better understanding of the GHS.

10. Activity in the industry

Certain industries have initiated the development of a voluntary initiative so that they can follow and share the international activities regarding the GHS. The Japan Soap and Detergent Association, for example, developed "Guidance for the implementation of the GHS of consumer products", and they aim to publish a guidance document for the future implementation of the GHS in collaboration with Asian countries.

International activities

11. Participation in the international GHS Committee

The Japanese Government has dispatched experts to the international committee organized by IFCS, UN GHS Sub-Committee, TDG expert group, OECD Task Force, and the UNITAR PAG meeting, and has provided information as necessary.

12. Activities in Asia-Pacific regions

The Japanese Government conducted a survey regarding the GHS activities in ASEAN countries as a joint project with UNITAR. The survey report is available at the UNITAR homepage.

Seminars have been organized by the Japanese Government and private sectors, and were held in several Asian countries. Experts from various fields have been invited from many Asian countries and necessary information has been provided to the experts. Approximately 1,000 experts followed such training courses. Recently, workshops focusing on the classification of hazards have been held.

Japanese Activities for the Implementation of the GHS



