

## The GCC's Global Harmonized System

Bringing Consistency in Classification & Labelling of Chemicals in the GCC

### Background

The Gulf Petrochemicals and Chemicals Association (GPCA) was formed in 2006 by the leading chemical manufacturers from across the Gulf Cooperation Council (GCC) member countries. Since its foundation GPCA has expanded to have thirty-five (35) Full Members, companies with manufacturing facilities in GCC region and two hundred and fifteen (215) Associate Members; International Producers, Chemical Sector Service Providers and Business Partners. GPCA is recognized as the "Regional Voice of the Chemical Industry".

One of GPCA'S success factors is the adoption of the global chemical industry's Responsible Care Program, which drives continuous improvement in environment, health, safety, and security (EHSS) standards at a global level. Chemical management is a key area of concern for the United Nations and the Chemical Industry and to address this one of the key global initiatives is the United Nations (UN) Globally Harmonized System (GHS) for classification and labelling of chemicals and mixtures. This system is aimed at harmonizing hazard communication associated with chemicals supply chain from production to final disposal, reducing the overall risk associated with the management of hazardous chemicals and substances.

### Impact on Industry

The Chemical Industry is committed to the Responsible Care® Global Charter which commits them to safeguard people and the environment, strengthen chemicals management systems and engage stakeholders. However the absence of a standardized solution in the GCC for the classification and labeling of chemicals results in the following challenges:

- Increased safety risk for employees and environmental damage;
- Limitations to expand future international markets as market demands mature;
- Negative corporate image and credibility;
- Additional workload to manage differences in standards;
- Lack of compliance to the principles of Responsible Care®.

### Impact on Other Stakeholders

The main objective of safety data sheets (SDS's) and labelling is to ensure that employers, employees, and the public are provided with adequate, practical, reliable and clear information on the hazards of chemicals, so that they can take effective preventive measures. GHS is aimed largely at the protection of users; chemical industry workers and product end-users including the environment. The impacts today of inadequate GHS implementation to various stakeholders can be briefly grouped as follows:

#### Governments and Regulators:

- Lack of accurate hazard data for Emergency Responders;
- Inconsistent cross-border chemical information;
- Duplication of efforts in creating national systems in lieu of regional systems;
- Potential domestic and international negative reputation due to poor chemical management;
- Lack of government framework for monitoring and enforcement.

#### Chemical Storage and Transporters

- Lack of consistent chemical hazard information resulting in a higher safety and environmental risks

## Workers and the General Public

- Higher risk of incidents involving hazardous chemicals
- Lack of understanding due to inconsistent information

## Current Situation

There is a lack of regulations in the GCC member countries regarding the classification and labelling of chemicals, their hazards and their impact on human health and the environment. Currently, safety data sheets (SDSs) and labels are being managed by manufacturers and importers, using inconsistent methods of hazard classification. Some are compliant with the EU regulation (CLP), whilst others follow the American regulation (OSHA) or Canadian regulations (WHMIS). Hybrid systems are also in existence. These differences create inconsistencies in hazard communication throughout the supply chain and result in additional safety and environmental risks and inefficiencies throughout the chemical supply chain; raw material to the end of the product lifecycle.

Although these existing classification systems are similar in many respects, their differences are significant, resulting in different hazard classification for the same chemical in different countries; chemicals may be classified as flammable or carcinogenic in one country, but not in the adjacent country.

Accordingly, the UN GHS is increasingly adopted in many countries, accepted as an international approach to define chemical hazards, classifying chemicals based on the best available data, and hazard information on labels and safety data sheets.

The UN GHS is not a formal treaty; it becomes binding only when the country or confederation of countries adopt UN GHS in their legal system, added to the fact that the UN GHS text allows for a certain degree of flexibility. An added advantage is that every 2 years the UN GHS recommendations are updated and should be implemented in the national legislation.

In the GCC member countries the UN GHS system is already being implemented by selective companies driven by their global presence, but different versions of GHS are being used by those companies. The use of multiple systems causes confusion as previously stated.

## Proposal to Address the Issue

GPCA Product Stewardship Task Force have studied various international solutions that address the Globally Harmonized System (GHS), and have concluded that the European Classification, Labelling and Packaging Regulation (CLP) offers the most beneficial solution, primarily based on worldwide adoption and market size and proximity. Key benefits of implementing a regional solution for GHS can be summarised as follows:

- Risk reduction of serious chemical related incidents;
- Remove associated potential international trade of chemicals barriers;
- Promotion of the safe handling of chemicals based on solid scientific principles;
- Increased confidence in chemicals whose hazards have already been properly assessed and identified based on international standards
- Improved exchange of information between the GCC states utilizing one unified and internationally recognized system for classifying hazardous substances and mixtures;
- Availability of standardized formats of hazardous classification section in the SDSs and labels as a standardized format for hazard communication;
- Availability of existing hazard classifications, already assessed and adopted by other countries;
- Alignments with international systems for dangerous goods transport classification (sea, road and rail).

## Way Forward

GPCA propose on the legislators to adopt GPCA Code of Practice in order to implement a consistent legislative framework for UN GHS in the GCC countries. This would provide a solid foundation for a unified GCC approach for the classification and labelling of chemicals. The GPCA Code of Practice is based on:

- Existing GCC country SDS, label and hazard communication legislation and standards;
- The UN Globally Harmonized System (GHS) on classification and labelling;
- The European Regulation (EC) No 1272/2008 - CLP Regulation.

As an initial step, the formation of a Regional GHS Coordinating Committee is proposed, comprising of Government, Industry and public stakeholders, to act as a custodian for developing and technically supporting the implementation of a unified GHS Regional solution.

This Committee should have a clearly defined mandate and structure to achieve its objectives. Key considerations for the mandate would be:

- Securing the high level of commitment of each GCC country to implement GHS, including the provision of essential identified resources;
- Identification of key stakeholders, i.e. government, industry, society etc.;
- Development of a strategy and a time frame for the regional implementation process, based on the adoption of a 'risk based approach';
- Establish governance and communication processes that support effective implementation;
- Participate and advocate at applicable regional and international forums and industry groups to solicit common understanding and direction;
- Consider involvement in the United Nations Sub-Committee of Experts on the Globally Harmonized System (UNSCEGHS), and the United Nations Sub-Committee of Experts on the Transportation of Dangerous Goods (UNSCETDG).

Produced by:

**The Gulf Petrochemical and Chemical Association (GPCA) Product Stewardship Task force**