

Comparative Analysis: The GHS implementation in EU, USA and Asia (Philippines, Malaysia, and Japan)

Research Paper No. 2016-04



Department of Labor and Employment
Occupational Safety and Health Center
North Avenue corner Agham Road,
Diliman, Quezon City, Philippines



Comparative Analysis: The GHS implementation in EU, USA and Asia (Philippines, Malaysia, and Japan)

Hiroshi Jonai (College of Science and Technology, Nihon University, Japan),
Ma. Teresita Cucueco (Occupational Safety and Health Center, Philippines),
Goh Choo Ta (Institute for Environment and Development, Universiti Kebangsaan,
Malaysia)

Abstract

The Globally Harmonized System of Classification and Labelling of Chemicals (GHS) was issued as United Nations Recommendations in 2003. The World Summit on Sustainable Development (WSSD) encouraged countries to implement the GHS as soon as possible with a view to having the system fully operational by 2008. Since then, many countries all over the world have implemented or are preparing to implement the system. The pace and extent of global implementation of the GHS, though, have been noted to be uneven and diverse. The status of the implementation of the GHS in the workplace in the Philippines, Malaysia and Japan was studied and compared with that in the EU and the USA. Comparisons focused on the provisions of the regulatory system including accountability and penalty; target chemicals; target audience; and hazards exempted from classification. The approaches to implement the GHS varied according to the countries and the implementation, to a larger extent, would depend on existing regulatory systems. Because the GHS, by its form and intent is recommendatory, the scope and extent of the GHS implementation in every country around the world will not be the same at any given.

Of the five countries selected in this study, Japan was the first country to adopt the GHS in 2006 following the revision of the Industrial safety and

Health Law (ISHL). The EU enacted the Registration, Evaluation, Authorization classification of Chemicals and Restriction of Chemicals (REACH) regulation in 2006, however, the Regulation on classification, labelling and packaging of substances and mixtures (CLP) which is equivalent to the GHS was issued in 2008. Though the GHS implementation came later for the Philippines and Malaysia, both countries at the outset targeted all hazardous chemicals in the workplace. The countries in this study have taken the mandatory approach by aligning their state's chemical management policies and programs with the core elements of the GHS. The use of both labels and SDS for hazard information is prescribed through a singular national policy in Malaysia, the Philippines and the USA. In the case of the EU and Japan, requirements for the use of label and of SDS are found in separate regulations.

Since the building block approach is adopted in HCS of the USA and the ISHL of Japan, environmental hazard is not included in these regulations. However, Japan essentially covers all hazards defined in the GHS because PRTRL has included environmental hazard in its provisions for chemical classification and labelling. The DOSH of Malaysia has taken the proactive measure to incorporate environmental hazards in the CLASS 2013. DO 136-14 of the Philippines likewise included environmental hazard in the implementation of the GHS.

This paper would be helpful for the countries to consider the implementation of the GHS.