



The Monarch Message

Monarch Regulatory Services Inc.
20 Kings Gate, Dundas, ON, L9H 3Z7
905-628-6631
www.monarchregservices.ca

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GHS – On Its Way?

Chrim Middleton

GHS. What does it mean? Where is it coming from? Where are we now? What should we expect?

What does it mean?

The Global Harmonization System (GHS) is a global safety system developed by the United Nations that impacts all aspects of chemical product use:

1. transportation;
2. workplace safety;
3. consumer chemical products; and
4. pest control products.

The 1st revised edition of GHS, known as The Purple Book, was published in 2005. The 2nd revised edition of GHS was published in 2007.

The key elements of the GHS are classification, labelling, safety data sheets, and training. The goal of having a globally harmonized system is to bridge the gap between different systems that are used for hazard classification nationally and internationally.

Currently in Canada there are different systems for hazard classification depending on the use of a product. Additionally, there are different systems in use around the world. By having a globally harmonized hazard classification

and communication system, industry will be able to prepare their products better for the global market. It will also enable easier recognition and identification for all products regardless of their use.

Each UN member country has the ability to select different aspects of the GHS. This allows for variations due to environmental, climate, and industry concerns. This is the same process that is used for the transportation of dangerous goods requirements.

It is important to understand how the information will filter through from The Purple Book to you – affecting the way that products are classified and the communication of the hazards.

Where is it coming from?

For GHS to be implemented in Canada each of the affected Canadian regulations must be updated to incorporate the GHS requirements. There are a number of different acts and regulations affected by the GHS requirements:

1. Transportation of Dangerous Goods Act and Regulations;
2. the Hazardous Products Act ;
3. the Controlled Products Regulations (WHMIS);
4. the Consumer Chemicals and Containers Regulations ; and

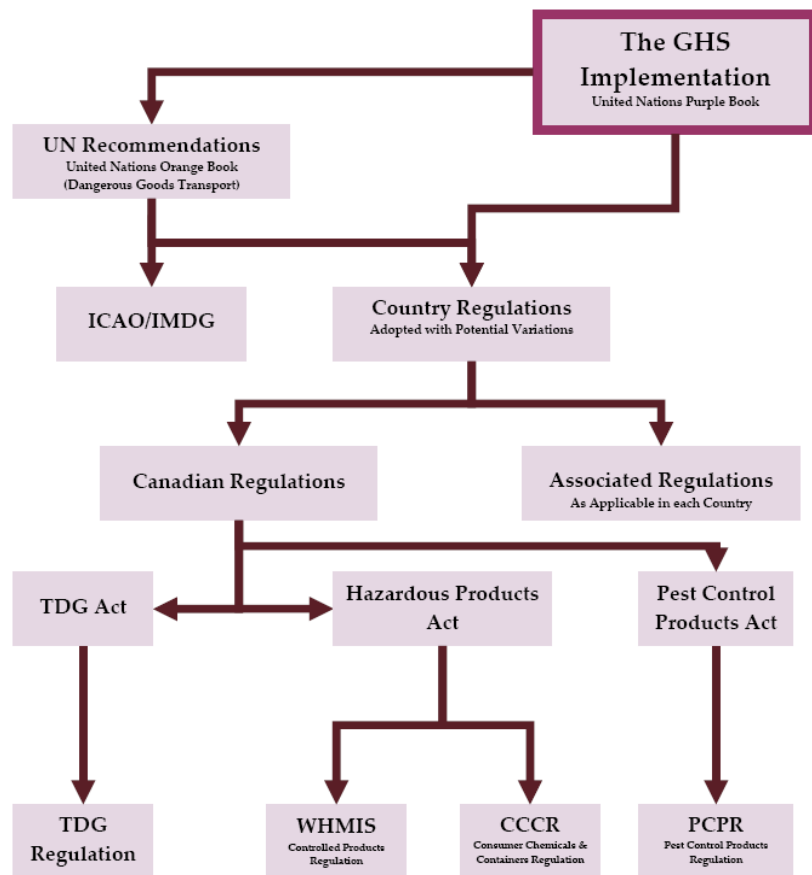
5. the Pest Control Products Act and Regulations.

In Canada, proposed regulatory changes are published in Gazette I for industry to be aware of. These changes are given a waiting period which allows industry to provide comments on the upcoming changes. Following the comment period the government may then make alterations to the proposed changes.

Once the government is ready they publish the official changes in Gazette II. The date that the changes are effective depend on how the government words them. Generally the changes become law on the day they are registered; however, sometimes there are implementation time frames that are allowed. Each set of changes is treated individually and some are granted implementation time frames while others are not. Example: most of the recent changes to the Transportation of Dangerous Goods (TDG) Regulations, February 20, 2008 were applicable the day that they were registered.

This downstream effect is the process through which we will see the GHS implemented (see figure 1).

Figure 1: The GHS Implementation in Canada



Where are we now?

The implementation of GHS through the Transportation of Dangerous Goods Regulations has already begun. Amendment 6 has brought the TDG Regulations in line with the 1st edition of the Purple Book (2005). This includes the classification changes that were required (Class 3, 6.1, and 9).

There are already some aspects of GHS that are acceptable practices for Health Canada. For example: Health Canada is already accepting the GHS format for material safety data sheets; however, all information provided must still be compliant with our current WHMIS standards.

Except for transportation, Canada is still working on proposed

changes for the other applicable regulations.

What should we expect?

Internationally there are already other UN member countries that are moving forward with GHS.

Australia already has their GHS proposed workplace regulations out to industry for comment. Their comment period ended March 2007 with a target date for 2008 as their implementation goal.

Some countries have already implemented parts of the GHS throughout their regulations:

1. New Zealand has GHS workplace regulations in place since 2006 through the Hazardous Substances and New Organisms (HSNO) Act;

2. Ecuador has revised two national technical guides to include GHS criteria – “Transport, storage and handling of dangerous chemicals. Requirements” and “Labelling of dangerous chemicals. Requirements”; and
3. Japan included GHS in their national standard “Labelling of chemicals based on GHS”.

As of June 2007, the European Union (EU) launched REACH (Regulation for Registration, Evaluation, Authorisation and Restriction of Chemicals). REACH will be the legislative vehicle for incorporating the GHS into the EU. GHS was not originally included in REACH because GHS was not at a level to be able to be incorporated when REACH was at the proposal stage. The inclusion of the GHS would have delayed the launch of the legislation. The EU did not want REACH to be delayed further. They are still working towards a proposed version of the GHS.

The United States is still in consultation stages with key associations and companies.

In Canada, GHS is already partially implemented through the transport regulations. It is only a matter of time before it will be implemented in our other regulations.

Industry will be provided with significant notice when Canada is ready to move forward. It is important that Canada be in line with other countries as we all move forward with our GHS implementation programs. Keep yourself up-to-date!