



Issues on the GHS implementation in Japan

(Globally Harmonized System of
Classification and Labelling of Chemicals)

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What is the GHS?

The Globally Harmonized System of Classification and Labelling of Chemicals (GHS) was issued as United Nations Recommendations in 2003. Since then, many States all over the world have implemented or are preparing to implement the system.

The GHS will, substantially and inevitably, become the international standards in promoting sound chemical management.



What is the **GHS**?

- **Classification** of chemicals according to the coherent criteria
- **Label** elements
- Minimum information for an **SDS** (Safety Data Sheet)

 These are **technical matters**.

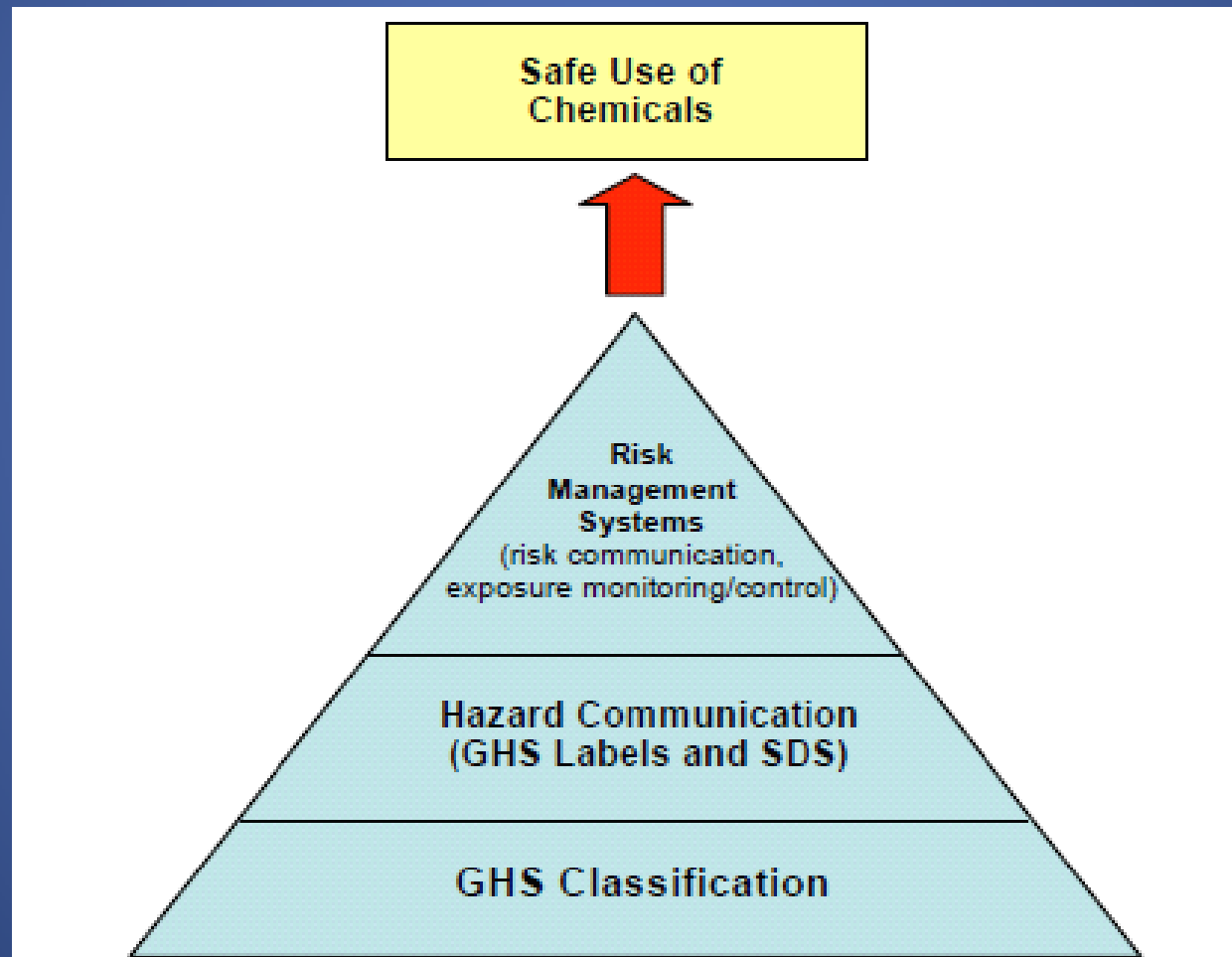


Hidden principle of the GHS

Hazard communication system should be the basis of chemical control system.

- **This is not stressed in the GHS**
 - Because the primary bases of the GHS are regulations of **Europe** and **North America** in which hazard communication systems have been established decades ago, that is, this is common base to them.

Without information, No countermeasures!



Important points to implement the GHS

- **No chemical** is to be **exempted** from classification.
- **All hazards** (physical, health and environmental) should be **classified**.
- **Labels** and **SDSs** shall be **mandatory**.

What is the regulatory principle to inform of hazards?



- **USA**, Hazard Communication Standards (HCS)
“Worker’s right to know”
- **EU**, Classification, Labelling and Packaging of Substances and Mixtures (CLP)
“Supplier’s obligation to inform”

The principle depends on the country’s culture or custom.

Purpose of this presentation

- To share Japan experience of the GHS implementation
- To inform you of Japan revised regulations related to the GHS



Hazard communication system

- In Japan no comprehensive system has developed.

Why? - Nobody thought that there was no system in Japan.



They think that products without hazard information on a label are safe.

- There is no laws to implement the GHS as it is in Japan so far.



Responsibility of accidents?

Problem by no haz-com system

- Once an accident occurred by a chemical of which a label has no hazard information.



- Who **should be responsible** for that, the government, a supplier, an employer, a supervisor or a user oneself ?

GHS implementation in Japan



[Mandatory] – specific substances

- Industrial Safety and Health Law (labels and SDSs)
- Act of PRTR Law (SDSs)

[Effort-Obligation] – other than specific substances above

- Ordinance of Industrial Safety and Health Law (labels and SDSs)
- Act of PRTR Law (labels and SDSs)



Labels and SDS for hazardous chemicals in **workplaces** are required whether or not mandatory

GHS implementation in Japan



	Label [Article No.] (Effective date)	SDS [Article No.] (Effective date)
ISHL	104 substances - mandatory [Article 57-1] (2006.4.1)	640 substances - mandatory [Article 57-2] (2006.4.1)
ISHL Ordinance	Other substances - effort- obligation [Article 24-14] (2012.4.1)	Other substances - effort- obligation [Article 24-15] (2012.4.1)
PRTR Law Act	<ul style="list-style-type: none">• Designated substances (Class I 462, Class II 100) – effort-obligation (2012.6.1)• Other substances - effort- obligation (2012.6.1)	<ul style="list-style-type: none">• Designated substances (Class I 462, Class II 100) – mandatory (2012.6.1)• Other substances - effort- obligation (2012.6.1)



For classification or labelling, JIS Z 7252 or JIS Z 7253 to be referred.



Issues to be considered in Japan

- There is no GHS-based system for consumer products.
- Effort-obligation system may be hard for foreign companies to understand.
(effort-obligation : to do the best to observe regulations, no penalty)
- GHS, especially pictograms and hazard statements, is challenging to Japanese, so good educational system is needed.

Status of GHS implementation (mandatory – with a kind of penalty)



Region or country	Chemicals covered	Hazards exempted	Sectors covered
EU -CLP, REACH	All	None	All
USA -HCS	All	Environmental	Workplace
Japan -ISHL	Label-104 SDS-640	Environmental	Workplace
ASEAN	???	???	???

EU way might be the most understandable.



Arigato-gozaïmashita!

