Preparing a National Chemical Hazard Communication Situation Analysis

Guidance Prepared as Part of the UNITAR/ILO/IOMC Training and Capacity Building Programme "Assisting Countries to Develop and Implement National Chemical Hazard Communication and GHS Action Plans"

Pilot Phase
2001-2003

Working Draft
October 2001

UNITAR

IOMC

INTER-ORGANIZATION PROGRAMME FOR THE SOUND MANAGEMENT OF CHEMICALS

A cooperative agreement among UNEP, ILO, FAO, WHO, UNIDO, UNITAR and OECD

Programme Principles

- **a multi-stakeholder approach**, involving representatives from various government ministries as well as concerned parties outside of government, such as industry, research institutions, labour, and public interest groups;
- **a country-driven process** through which partner countries assess and identify their chemicals management needs and link their related activities to national environmental and developmental objectives; and
- **an inter-sectoral approach** to chemicals management in order to facilitate chemical risk reduction and pollution prevention across all stages of the life cycle.

UNITAR gratefully acknowledges the long-term financial support provided by the Swiss Agency for Development and Cooperation (SDC) and, more recently, the Netherlands Minister for Development Cooperation.

For additional information, please contact:

Deputy Programme Co-ordinator
Training and Capacity Building Programmes in Chemicals and Waste Management
United Nations Institute for Training and Research (UNITAR)
Palais des Nations
CH- 1211 Geneva 10
Switzerland
FAX: + 41 22 917 8047
Email: cwm@unitar.org

International Labour Office (ILO)
4, route des Morillons
1211 Geneva 22
Switzerland
FAX: +41 22 799 6878
Email: safework@ilo.org

1. Introduction

This document provides specific guidance on working through an important activity in Phase 1 of the country-based projects for developing and implementing a national chemical hazard communication and GHS action plan, which is the preparation of a national chemical hazard communication situation analysis. The purpose of such an assessment is to document the existing legal, institutional, administrative and technical infrastructure and available national expertise – across key sectors – relevant to the development and implementation of a national chemical hazard communication action plan. It will also provide insight into potential challenges, as well as opportunities, that may be faced in developing the action plan. For example, an important outcome of a situation analysis is to reveal potential overlap and identify relevant existing structures upon which new activities could be built.

The following sections provide concrete guidance on the preparation of a National Chemical Hazard Communication Situation Analysis. Section 2 provides an overview of the contents and purpose of such an assessment. Section 3 offers specific suggestions on how such an assessment process might be organised and a final report developed.

2. Overview of the Situation Analysis

The National Chemical Hazard Communication Situation Analysis should summarise the current status of legal, institutional, administrative and technical infrastructures relevant to the development and implementation of a chemical hazard communication/GHS action plan, in both the governmental and private/non-governmental sectors. A comprehensive National Chemicals Management Profile, if one has been prepared, could serve as a good starting point for this analysis. Generally, the information relevant to chemical hazard communication is related to: the development and use of chemical labels; the development and use of chemical safety data sheets (SDSs); and other supporting materials used, and activities undertaken, in hazard communication training. For example, any and all existing regulations requiring the use of chemical labels including the responsible agencies, the types of labels used, and the information on the labels, would be of interest to those involved in developing a chemical hazard communication action plan. Likewise, any previous studies or available expertise on the comprehensibility of chemical hazard information (whether labels or SDSs) would also be extremely valuable inputs.

It is suggested to divide the assessment into 5 sections:

(1) Chemical Hazard Communication Infrastructure in the Industrial Production Sector
(2) Chemical Hazard Communication Infrastructure in the Agriculture Sector
(3) Chemical Hazard Communication Infrastructure in the Consumer Sector
(4) Chemical Hazard Communication Infrastructure in the Transport Sector
(5) Summary of National Chemical Hazard Communication Infrastructure

In each of those 5 chapters, the following information should be gathered:

(A) Background Information
(B) Legal/Regulatory Infrastructure
(C) Institutional/Administrative Infrastructure
(D) Programmes Conducted by Industry, Labour/Public/Environmental Interest Groups and Research Institutes
(E) Programmes Conducted with Support of International Organizations

The existing infrastructure in four key sectors will be assessed and a summary of the national situation will conclude the document. This assessment will be used as a main reference by the national Project Coordinating Committee and various sectoral Working Groups throughout the development of the national action plan. It may also play an important role in identifying critical issues which need to be addressed in consultation with concerned parties in order to ensure that that chemical hazard communication initiative will receive broad policy support. The process of collecting the information for the situation analysis is an important means for contacting key individuals and sources of expertise that should be involved; for these reasons, it is one of the key documents to be prepared in the run-up to the development of the national action plan.

Who Should Be Involved in Preparing the Assessment?
Basic to the success of preparing a situation analysis is the establishment of a clear management structure for overseeing its preparation. It is therefore suggested that the national chemical hazard communication Project Coordinating Committee, which is the entity responsible for the action plan, organises and supervises the work involved in conducting the analysis (including the delegation of sectoral analyses to experts from those sectors) and developing a final report.

Experience has shown the importance of conducting active outreach to ensure that all parties who might contribute relevant information or expertise are aware that the chemical hazard communication situation analysis is being initiated. The members of the Coordinating Committee will play a key role in identifying contact points in government, industry, academia, research institutes, non-governmental organisations, labour groups, and other relevant bodies.

It is important to establish contact, and maintain effective relationships, with the various governmental agencies and ministries that are likely to have information or expertise relevant to chemical hazard communication, and obtain their cooperation and involvement in the preparation of the assessment. Ministries/agencies that should be contacted include:

- Ministry of Environment;
- Ministry of Trade/Industry;
- Ministry of Health;
- Ministry of Labour;

- Ministry of Agriculture;
- Ministry of Transportation;
- Local regulatory agencies; and
- Any other agencies with activities relevant to chemical hazard communication (e.g. customs, emergency responders, national standards bureaus, etc.).

Organisations outside of government will also be a key source of information and input for the situation analysis. One section of the suggested report format specifically addresses the relevant programmes and activities of industry, research organisations and public, labour, and environmental interest groups. It is suggested that the members of the Coordinating Committee conduct interviews with and otherwise solicit input from representatives of the following types of organisations in conducting the assessment:

- National industry associations;
- National chemical industry associations;
- Major companies, including multi-national corporations;
- Labour groups;
- Universities with environmental or hazard communication programmes;
- Research institutes with environmental or hazard communication programmes;
- Environmental groups; and
- Other public interest groups.

The *process* of conducting the situation analysis should be kept as transparent and unbiased as possible. When scheduling meetings with the various agencies and non-governmental bodies from whom information is being sought, a clear indication should be provided about the purpose of collecting the information, the broader context of the chemical hazard communication action plan, and how these various bodies can contribute or become involved.

In addition to conducting necessary research in the various sectors and subject areas, preparing the final report is an important part of the work. The Coordinating Committee may want to delegate the drafting of certain sections of the assessment to particular agencies or experts, or establish informal working groups for the different sectors or specific subject-areas. Alternatively, a knowledgeable and neutral local consultant (e.g., based in a respected university) could be involved in collecting relevant information and drafting various chapters, subject to further review by the Coordinating Committee.

3. Suggested Structure and Guidance Questions

Below are brief descriptions and possible contents for each of the five suggested sections of the National Chemical Hazard Communication Situation Analysis. Guidance questions are provided for each topic area to assist in gathering the necessary information and to ensure that the key issues are addressed.

Suggested Contents

Introduction to the Analysis

The introduction to the analysis should familiarise the reader with the national work related to chemical hazard communication and clearly state the purpose of the National Chemical Hazard Communication Situation Analysis. It may also be useful to briefly describe the process through which the information was gathered, including the involvement of relevant parties within and outside of government.

(1) CHEMICAL HAZARD COMMUNICATION INFRASTRUCTURE IN THE INDUSTRIAL PRODUCTION SECTOR

(A) Background Information

- What groups in the industrial sector are exposed to chemical hazards? (e.g. workers in factories, whether chemical factories or factories that use chemicals to produce products)
- Where are these workplaces located within the country?
- If there are chemical factories, are they national or multinational?
- In industrial settings (e.g. factories), what types and amounts of chemicals are used?
- What types of monitoring systems, if any, are in place to detect chemicals in the workplace (e.g. measuring airborne concentrations of chemicals in a factory)? Who is responsible for these systems?
- What types of problems result from workplace exposure to chemicals (e.g. worker exposure due to handling of chemical barrels)? How are these monitored and recorded?
- What are the exposure routes in the workplace (e.g. inhalation, skin absorption, etc.)? What types of incidents and accidents are reported? How many?
- What exposure controls, if any, are available or in place? For example, are less toxic alternatives considered for use? Are engineering controls used in factories to reduce exposure?
- Do workers have access to SDS and personal protective equipment, when necessary? If not, why not? Is such equipment used? If not, why not?
- Do education and literacy levels have a bearing on the incidence of chemical exposure problems?

- Are first-aid facilities and training available to treat accidents?

(B) Legal/Regulatory Infrastructure

- Is there national legislation, regulations or standards related to classification and labelling in the industrial sector? If so, outline this in detail. What is the legislation based on?
  e.g. - ILO Convention 170;
  - Classification, packaging and labelling of dangerous substances in the European Union (Directive 67/548/EEC)
- If there is legislation or standards, is their implementation monitored or enforced? If not, why not? Who is responsible for monitoring and enforcement?
- Is there any legislation or regulatory standard related to workplace training for chemical hazard communication?

(C) Institutional/Administrative Infrastructure

- Which ministries or agencies have responsibility for the industrial sector? (e.g. Ministries of Labour, Industry, etc.)
- Are any training manuals or programmes in place for improving workplace chemical safety?
- Are there any documentation centres (e.g. in Ministries of Industry, or libraries in hospitals/health centres or community centres) that have information related to the use of chemicals in the workplace or statistics on incidents and accidents?
- Are there poison information or control centres, toxicological or national CIS (Occupational Safety and Health Information) Centres that can provide advice and assistance in the case of a workplace poisoning incident?

(D) Programmes Conducted by Industry, Labour/Public/Environmental Interest Groups and Research Institutes

- Which initiatives, if any, have been taken through industry associations related to chemical hazard communication? If so, outline those initiatives.
- Are there any interest groups with programmes to assist with chemical hazard communication in the workplace? If so, outline those programmes.
  e.g. national or local campaigns by labour unions, etc.
- Have research institutes or universities undertaken any studies regarding chemical hazard communication in the workplace (e.g. on the comprehensibility of chemical labels and SDS among factory workers)?

(E) Programmes Conducted with Support of International Organizations

- Are there any international organizations active in the industrial sector regarding chemical hazard communication activities? (e.g. ILO) If so, describe those activities.

(2) CHEMICAL HAZARD COMMUNICATION INFRASTRUCTURE IN THE AGRICULTURE SECTOR

(A) *Background Information*

- What components of the agricultural sector are exposed to chemical hazards? (e.g. farmers in fields)
- Where are these agricultural workplaces located within the country?
- In agricultural settings, what types and amounts of chemicals (pesticides, fertilizers, etc.) are used?
- What types of problems result from exposure to chemicals (e.g. farmer exposure due to pesticide spraying in agriculture)? How are these monitored and recorded?
- What are the exposure routes in the agricultural sector (e.g. inhalation, skin absorption, etc.)? What types of incidents and accidents are reported? How many?
- Do farmers and farm workers have access to personal protective equipment, when necessary? If not, why not? Is such equipment used? If not, why not?
- Do education and literacy levels have a bearing on the incidence of chemical exposure problems?
- Are first-aid facilities and training available to treat accidents?

(B) Legal/Regulatory Infrastructure

- Is there national legislation, regulations or standards related to classification and labelling in the agricultural sector? If so, outline this in detail. What is the legislation based on?

  e.g. - FAO Guidelines on Good Labelling Practice for Pesticides;
  - WHO Recommended Classification Of Pesticides By Hazard And Guidelines To Classification.
- If there is legislation or standards, is their implementation monitored or enforced? If not, why not? Who is responsible for monitoring and enforcement?
- Is there any legislation or regulatory standard related to chemical hazard communication training for agricultural labourers?

(C) Institutional/Administrative Infrastructure

- Which ministries or agencies have responsibility for the agricultural sector? (e.g. Ministries of Labour, Agriculture, etc.)
- Are any training manuals or programmes in place for improving agricultural chemical safety?
- Are there any documentation centres (e.g. in Ministries of Agriculture, or libraries in hospitals/health centres or community centres) that have information related to the use of chemicals in agriculture or statistics on incidents and accidents?

- Are there poison information or control centres, or toxicological or national CIS (Occupational Safety and Health Information) Centres that can provide advice and assistance in the case of a poisoning incident?

(D) Programmes Conducted by Industry, Labour/Public/Environmental Interest Groups and Research Institutes

- Which initiatives, if any, have been taken through pesticide industry associations related to chemical hazard communication? If so, outline those initiatives.
- Are there any interest groups with programmes to assist with chemical hazard communication in the agricultural sector? If so, outline those programmes.
  e.g. national or local campaigns by farmers associations, etc.
- Have research institutes or universities undertaken any studies regarding chemical hazard communication in the agricultural sector (e.g. on the comprehensibility of chemical labels among farmers)?

(E) Programmes Conducted with Support of International Organizations

- Are there any international organizations active in the agricultural sector regarding chemical hazard communication activities? (e.g. FAO) If so, describe those activities.

(3) CHEMICAL HAZARD COMMUNICATION INFRASTRUCTURE IN THE CONSUMER SECTOR

(A) Background Information

- What consumer products are available and/or used that involve a risk of chemical exposure?
- What types of sector-specific problems result from exposure to chemicals (e.g. poisonings due to misuse of detergents of bleaches)?
- Have incidents of accidental or misuse of chemical products in households been reported? If so, what types of problems have occurred?
- What are the exposure routes in consumer products (e.g. ingestion, skin absorption, etc.)?
- What language (e.g. language on consumer product labels) and literacy issues are faced by consumers with respect to chemical hazard communication?
- Do domestic workers who use consumer products face any special issues regarding chemical exposure?
- Are consumer products used in the industrial sector? If so, are SDS available for these products?
- Are there any imported consumer products that have hazard communication information (e.g. a flammable symbol) already with the product? If so, is this information suitable for the needs of consumers in the national market?

(B) Legal/Regulatory Infrastructure

- Is there legislation, regulations or standards related to classification and labelling for consumers? If so, outline this in detail. What is the legislation based on?
- If there is legislation or standards, is their implementation monitored or enforced? If not, why not? Who is responsible for monitoring and enforcement?
- Is there any legislation or regulatory standard related to consumer education and awareness raising for chemical hazard communication?

(C) Institutional/Administrative Infrastructure

- Which ministries or agencies have responsibility consumer safety? (e.g. Ministries of Labour, Health, or agencies like Standards Bureaus)
- Is there a poison information centre that can provide advice and assistance in the case of a consumer poisoning incident?

(D) Programmes Conducted by Industry, Labour/Public/Environmental Interest Groups and Research Institutes

- Are there any consumer groups or associations active regarding raising awareness of chemicals in consumer products?

- Are any industry associations active regarding education for consumers about chemical products?

(E) Programmes Conducted with Support of International Organizations

- Are there any international organizations active in the consumer sector regarding chemical hazard communication activities? (e.g. ILO or WHO) If so, describe those activities.

(4) CHEMICAL HAZARD COMMUNICATION INFRASTRUCTURE IN THE TRANSPORT SECTOR

(A) Background Information

- What components of the transport sector are involved with chemicals? (e.g. transport by road and trucks, transport of chemicals by rail, water or air)
- What types and amounts of chemicals are transported into, out of, and within the country? By what routes?
- What types of vehicles and containers are used to transport chemicals among the different methods (road, rail, air, water)?
- What types of problems result from exposure to chemicals in the transport sector (e.g. truck driver exposure due to accidents and spills)?
- Do education and literacy levels have a bearing on the incidence of chemical exposure problems?

(B) Legal/Regulatory Infrastructure

- Is there legislation, regulations or standards related to classification and labelling for transport? If so, outline this in detail. What is the legislation based on (e.g. UN Recommendations on the Transport of Dangerous Goods)?
- Are the IMO International Maritime Dangerous Goods Code, International Civil Aviation Organization Technical Instructions for the Safe Transport of Dangerous Goods by Air, or International Air Transport Association (IATA) Dangerous Goods Regulations being used?
- If there is legislation or standards, is their implementation monitored or enforced? If not, why not? Who is responsible for monitoring and enforcement?
- Is there any legislation or regulatory standard related to transport training for chemical hazard communication?

(C) Institutional/Administrative Infrastructure

- Which ministries or agencies have responsibility for the transport sector?
- Is there a poison information centre that can provide advice and assistance in the case of a transport accident?

(D) Programmes Conducted by Industry, Labour/Public/Environmental Interest Groups and Research Institutes

- Which initiatives, if any, have been taken through transport associations related to chemical hazard communication?

(E) Programmes Conducted with Support of International Organizations

- Are there any international organizations active in the transport sector regarding chemical hazard communication activities? e.g. IMO, ICAO, etc.

(5) SUMMARY OF NATIONAL CHEMICAL HAZARD COMMUNICATION INFRASTRUCTURE

(A) Background Information[1]

Section 5 of the assessment briefly summarises the economic infrastructure of the country (e.g. industry, agriculture) as well as information on chemical use patterns and the use of hazard communication tools (e.g. labels or SDSs). Overview information is provided on the economic sectors and geographic regions in the country which generate, import or use chemicals.

5.1. Overview of Relevant National Chemicals Management Infrastructure

- What are the current national levels of production, import and export of chemical substances and/or mixtures?
- What are the current uses of chemical substances and/or mixtures?
- What types of chemicals are being used? What are the national trends in chemicals use?

5.2 Sectors with High Likelihood of Chemical Exposure (and therefore requiring hazard communication tools and training)

- Which economic sectors in the country involve chemical use, production, generation and transport and to what degree?*

5.3 National/Regional Environmental Priority Problems Related to Chemical Use and Exposure

- Which sectors have the highest incidence of chemicals-related problems (either proven or perceived)?*
- Are there documented or reported cases of intentional misuse or accidental poisoning? What are the causes of this?*
- What emergency services are active with respect to chemical emergencies? (e.g. fire brigades, ambulance and hospital services, police, civil defence, etc.)
- In what types of situations have emergency responders been exposed to chemical hazards? Where have these emergencies taken place? (e.g. in factories or due to transport accidents)

[1] Countries that have prepared a National Profile to assess the national infrastructure for chemicals management will find some of the background information for the National Chemical Hazard Communication Situation Analysis in their National Profile document. For information on preparing a National Profile, please see UNITAR/IOMC, *Preparing a National Profile to Assess the National Infrastructure for Management of Chemicals: A Guidance Document*.

* Summary information from the sector-specific sections 1-4 above could be used here.

- Do emergency responders have access to personal protective equipment or other exposure reduction measures? If not, why not?

5.4 Public Awareness and Access to Information Related to Chemicals

- How is the public informed about the state of the environment, environmental problems that cause national and local concern, or chemical hazards?
- Does the public currently have access to chemical hazard communication tools? How is access to those tools provided?
- Does the media, NGOs, local government, industry associations or other actors undertake public awareness activities?*
- Is the level of education of the general public, workers and others exposed to chemicals a consideration with regards to the understanding and use of chemical hazard information?
- What challenges with respect to different languages are faced with respect to understanding chemical hazards?

(B) National Legal/Regulatory Infrastructure Relevant to Chemical Hazard Communication

This section documents existing environmental laws and regulations which relate to chemical labelling, the use of SDS, and hazard communication training and other tools. The chapter is also meant to provide information to determine the coherence of the existing legal/regulatory framework in relation to hazard communication.

One of the main objectives of this section is to provide information to the Coordinating Committee to address the following two questions: (a) Do current environmental laws provide a framework into which new chemical hazard communication activities or the GHS could be incorporated and, if so, are modifications to the current system required? and (b) Is there a need to enact new legislation to establish the legal and institutional basis for activities resulting from the national chemical hazard communication action plan?

The main sources of information for preparing this section are the official texts of all relevant environmental laws and regulations. Interviews with government agency staff who are responsible for implementing these laws on a routine basis, as well as with private and government environmental and labour lawyers, are also recommended.

5.5 Legislation Related to Chemicals Management

- Is general legislation in place that addresses environmental, occupational health and public health problems associated with chemical use and exposure?
- Is chemicals management legislation in place which addresses the various stages of the chemical life cycle, such as production, storage, transport, use, and disposal?

- Does any law or regulation classify chemicals and/or chemical use according to risks to human health and the environment?

5.6 Legal Mandates of Government Authorities

- Which government agencies have received a legal mandate to regulate or control:
    - the generation (production), import/export, use and/or transfer of chemicals or chemical products;
    - occupational safety;
    - public health and safety;
    - environmental protection.

5.7 Legislation Related to Chemical Hazard Communication

- Is there legislation in place that addresses any or all components of chemical hazard communication (labels, SDSs, training)? Are all or only certain sectors (e.g. transport or agriculture) covered?*
- Can this legislation be easily modified to accommodate new elements, such as the GHS? If not, why not?
- Which government ministries, agencies or competent authorities have a legal mandate to regulate or control activities in the area of chemical hazard communication?

5.8 Regulatory Standards for Classifying and Labelling of Chemicals

- Are any existing standards for classifying and labelling chemicals being used?
- Is specific information required on chemical labels? Is so, what information? Was a certain model or standard used (e.g. ANSI Z129.1)?
- Are the information requirements the same for all categories of chemicals (e.g. industrial chemicals, pesticides, etc.)? If not, why not?

5.9 Regulatory Standards for SDSs

- Are there any regulatory standards governing the use of SDSs? If so, what are they?
- Is specific information required in SDSs? If so, what information? Was a certain model or standard used (e.g. ISO 11014 or ANSI Z400.1)?
- Are the information requirements the same for all categories of chemicals (e.g. industrial chemicals, pesticides, etc.)? If not, why not?

5.10 Regulatory Standards for Chemical Hazard Communication Training and Other Tools

- Are there any regulatory standards governing chemical hazard communication training activities? If so, what are they?
- What is the basis for these standards?
- What types of training activities (e.g. workshops, use of public awareness tools, comprehensibility studies, etc.) are covered by these standards?

- Are there any regulatory standards governing the use of other chemical hazard communication tools (such as brochures, posters, use of media, etc.)? If so, what are they?

5.11 Enforcement of Chemical Hazard Communication Related Legislation and Regulations

- Are the regulatory requirements identified above properly implemented and enforced? If not, what are the major constraints in ensuring proper enforcement? Who is responsible for monitoring and enforcement?

5.12 Legal Provisions Related to Environmental Information Management and Dissemination

- Does any law assign responsibility to a government agency to disseminate information on chemical labels and SDSs?
- Is there any element in the national legislation mandating public disclosure of environmental information?
- Is there any "right-to-know" component at the individual, community, regional or national level?
- Is there any element in the laws preventing disclosure of information (e.g. information on production processes, hazard criteria, etc.) for proprietary reasons?

(C) National Institutional/Administrative Infrastructure Relevant to Chemical Hazard Communication

This section documents the existing institutional/administrative infrastructure and assesses the existing capacity for taking on the operation of a national chemical hazard communication action plan. The section should describe the current responsibilities and programmes conducted by various governmental agencies in the area of chemical labelling, the use of SDSs, and other chemical hazard communication tools and training. The main source of information for the section could be interviews with the staff of various government agencies at different levels of authority. These interviews are important to obtain a clear picture of the current institutional arrangements and actual mechanisms in relation to chemical hazard communication. It is important to assess how these mechanisms operate in practice and to what extent regulatory provisions are actually implemented.

5.13 National Authorities Concerned with Chemical Hazard Communication

- Which ministries/agencies have responsibility for or undertake activities related to:
    - chemical labelling;
    - SDS use;
    - hazard communication training;
    - emergency response.
- Outline these activities in detail.

- Are these activities sectorally divided or comprehensive across all sectors?
- Are these efforts coordinated, and if so, how?
- What infrastructure (e.g. labs, expertise, etc.) exists for undertaking chemical testing and classification?
- Is there a poison information or national chemical emergency centre that can provide advice and assistance in the case of a chemical emergency?*
- Are any other chemical hazard communication-related activities undertaken or hazard communication tools used at this level?
- What is the hierarchical authority and what are the reporting links between the various agencies and their sub-units?
- What financial resources may be available/could be mobilized for future activities planned under a national action plan?

Suggestion: It may be useful to develop an organizational flow chart of ministries, agencies and sub-units indicating their relative authority and reporting relationships.

(D) Programmes Conducted by Industry, Labour/Public/Environmental Interest Groups and Research Institutes Relevant to Chemical Hazard Communication

This section of the assessment documents the activities of industry, labour, public or environmental interest groups, research institutes and other sectors outside of government that could potentially contribute to the development and implementation of an effective national action plan. Examples of these activities might include: industry use of voluntary labelling standards; initiatives by non-governmental organisations regarding training and workshops on chemical hazard communication issues in workplaces; or studies undertaken by research institutes on the comprehensibility of different types of hazard communication tools like labels or SDSs. These activities of the non-governmental sector can be an invaluable source of information and expertise for the development of the chemical hazard communication action plan.

The process of preparing this section should not only provide valuable information, but should also facilitate the establishment of collaborative relationships with various concerned interest groups, as a basis for future consultation. These discussions may also provide an understanding of the general environmental awareness of the public regarding chemical hazards, as a basis for assessing whether there is public interest to support innovative chemical hazard communication activities.

5.14 Relevant Chemical Hazard Communication Programmes of Industry

- Is there an existing national chemical industry? If so, is it local, multinational, etc.?
- Which initiatives, if any, have been taken through industry associations relating to chemical hazard communication? (e.g. voluntary use of labels; worker training on SDSs; etc.)*

- Are there any ongoing activities within industry to develop chemical hazard communication programmes? Are such initiatives taken by individual companies or by national industry associations?
- What elements of these programmes would be helpful in setting up a national hazard communication action plan?

Suggestion: It may be useful to assemble a list of companies, industrial associations, etc., with respective contact points, that are already implementing chemical hazard communication initiatives. Liaison with these groups will be useful for future consultations.

5.15 Relevant Chemical Hazard Communication Programmes Labour, Public or Environmental Interest Groups and Universities, Research Institutes

- What studies or programmes have been initiated by universities, research institutes, or public, labour, or environmental interest groups related to chemical hazard communication?*
  e.g. - comprehensibility studies by a university;
  - educational programmes run by labour organizations;
  - joint worker/employer or tripartite (government, workers, employers) occupational safety and health committees.
- What elements of these studies or programmes would be helpful in setting up a national hazard communication action plan?
- Do these groups undertake any other chemical hazard communication-related activities?

Suggestion: It may be useful to assemble a list of public/environmental/labour interest groups and other relevant organisations with respective contact points that are already involved in chemical hazard communication activities. Liaison with these groups will be useful for future consultations.

Suggestion: It may be useful to generate bibliographic references of all pertinent studies that have been identified, including contact points (e.g. authors, universities, addresses, telephone numbers).

(E) Programmes Conducted with the Support of International and Bi-lateral Organisations Relevant to Chemical Hazard Communication

This section of the assessment provides an overview of international activities and ongoing programmes at the country level that have a chemical labelling, SDS, or hazard communication training component, or that could provide financial support for projects in these areas. It is important to make contact with these programmes as a basis for identifying possible linkages among related projects and to explore potential contributions that these organisations could provide to the national hazard communication initiative. The country-based representatives or regional offices of international organisations such as the Food and Agriculture Organization of the United

Nations (FAO), International Labour Organization (ILO), United Nations Development Programme (UNDP), United Nations Environment Programme (UNEP), United Nations Industrial Development Organization (UNIDO), the World Health Organization (WHO), the World Bank, or the embassies of countries which have bilateral cooperation projects can provide a useful starting point for gathering information. Another important source of information could be the Ministry of Foreign Affairs, especially in relation to those programmes, international agreements and/or conventions that do not have representative offices in the country.

- Which international organisations conduct programmes at the country level that may relate to chemical hazard communication (e.g. FAO, ILO, UNDP, UNIDO, UNEP, WHO)? What are these programmes?
- Which bi-lateral development cooperation agencies working at the country level have conducted programmes relevant to chemical hazard communication (e.g. U.S. Agency for International Development (USAID), Canadian International Development Assistance (CIDA), German International Aid Agency (GTZ), Swiss Agency for Development and Cooperation (SDC), Danish International Development Assistance (DANIDA), Swedish International Development Authority (SIDA), etc.)? What are these programmes?
- Has UNEP's Awareness and Preparedness for Emergencies at Local Level (APELL) process been implemented in the country?
- Has the country been participating in the development of the GHS?
- Does your country intend to implement the GHS? If not, will it implement other chemical hazard communication schemes?
- Is your country a member of ECOSOC?
- Is your country participating in the ECOSOC Sub-Committee on GHS (SC/GHS) implementation? If not, how can information about the GHS be obtained?
- How could funding of GHS implementation activities be achieved?

Suggested Annexes to the National Chemical Hazard Communication Situation Analysis

- Table of Relevant Regulations
- Table of Past and Ongoing Governmental and Non-governmental Chemical Hazard Communication Activities
- List of Label or SDS Formats Used in the Country
- Addresses/Contact Points in Government Agencies
- Addresses/Contact Points in Industries and Industry Associations
- Addresses/Contact Points in Labour /Public Interest/Environmental Groups
- Addresses/Contact Points in Universities/Research Institutes

The United Nations Institute for Training and Research (UNITAR) was established in 1965 as an autonomous body within the United Nations with the purpose of enhancing the effectiveness of the United Nations through appropriate training and research. UNITAR is governed by a Board of Trustees and is headed by an Executive Director. The Institute is supported by voluntary contributions from governments, intergovernmental organizations, foundations and other non-governmental sources.

The International Labour Organization is the UN specialized agency which seeks the promotion of social justice and internationally recognized human and labour rights. It was founded in 1919 and is the only surviving major creation of the Treaty of Versailles which brought the League of Nations into being and it became the first specialized agency of the UN in 1946. The ILO formulates international labour standards, provides technical assistance and promotes the development of independent employers' and workers' organizations and provides training and advisory services to those organizations. Within the UN system, the ILO has a unique tripartite structure with workers and employers participating as equal partners with governments in the work of its governing organs.