

Analysis of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) requirements in the new Regulations for Hazardous Chemical Agents in South Africa

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Introduction

The United Nations Globally Harmonized System of Classification and Labelling of Chemicals (UN GHS) uses hazard pictograms, hazard statements on labels and Safety Data Sheets (SDSs) to provide specifications for the classifications, prevention, management and communication of hazards to users of chemicals. In South Africa, the GHS has been domesticated through the Regulations for Hazardous Chemical Agents (RHCA, 2021), which fall under the Occupational Health and Safety Act of 1993. In this paper, we analyse and review the current GHS-related requirements in the current regulatory framework for hazardous chemicals in South Africa.

Methodology

This is a desk review and critical analysis of the new regulation in view of the UN GHS requirements and international practice.

Results and discussion

The RHCA regulations prohibit the casual use of statements such as "non-toxic", "non-harmful", "non-polluting" or "non-hazardous" except within the GHS framework. Under the RHCA, manufacturers, suppliers and employers are required to provide GHS-compliant SDSs as well as GHS-compliant labelling of chemicals, including chemicals in secondary containers. Similar to the United Nations GHS Purple book, the RHCA should have provided more requirements on precautions for safe handling of hazardous substances, including the handling of incompatible more requirements substances as well as a list of classes of chemicals that could react to produce hazardous situations as well as a list of conditions that can result in hazardous situations. The RHCA includes all classes of physical hazards from the UNGHS Purple book but inexplicably omits explosives and desensitized explosives.

Conclusion

The domestication of the UN GHS into national regulations will facilitate trade and protect workers and consumers in South Africa. However, there is need to include explosives as a category. Employers who deal with hazardous substances need to provide their employees with suitable and sufficient information as well as training on GHS.