Hazard Communication for the Middle East and Africa: Egypt, South Africa, Israel & Turkey

Presenter:

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• Egypt Environmental Affairs Agency (EEAA), under the Ministry of State of Environmental Affairs (MSEA) is responsible for control of chemical in Egypt.

• Actively engaged in efforts towards the sound management of chemicals with a National Implementation Plan (NIP) developed (1999)

• Environmental Law No. 4 and its Executive Regulation issued in 1994 with latest amendment issued as Law No. 9 of 2009

The EEAA has established a National Hazardous Substances Information and Management System (EHSIMS) with the following goals:

- Promoting the safe handling of hazardous substances
- Consolidate the procedure for obtaining licenses for hazardous substances which engages seven ministries (Agriculture, Industry, Health, Interior, Petroleum, Electricity, Environmental affairs)
- Administer guidance for safe storage, transport, packaging and labeling of hazardous substances.
• Database of chemicals which contains guidelines for handling hazardous substances: http://www.eeaa.gov.eg/ehsims/main/hs_services_guidelines_search.asp


ERS are documents that provide summaries of the applicable emergency information concerning the potential effects of the hazardous substances on human health and environment.

It is mainly a guide to help first responders with a way to identify the specific or generic hazards of the substances involved in the incident quickly, as well as protecting themselves and the general public during the initial response phase of the incident.
Physical Hazard Categories

- Explosive (6 divisions)
- Gas (3 divisions)
- Flammable (2 divisions)
- Flammable solid (3 divisions)
- Oxidizing (2 divisions)
  - Oxidizing substances
  - Organic peroxides
- Hazardous (2 divisions)
  - Poisonous
  - Infectious
- Radioactive
- Corrosive/irritant
- Dangerous to the aquatic environment

Labeling Elements

- Contents, active substance and concentration
- Total and net weight
- Name of producer, date of production and production number
- Nature of danger and symptoms of toxicity
- First aid procedures
- Safe method of opening, emptying and using container
- Safe storage method
- Method of disposal of empty containers

The hazard symbol follow the UN symbols with an Arabic word below the pictogram
The label has to be in Arabic language.
Relevant Decrees

- Law number 499/1995 authorizes the Ministry of Industry as the responsible agency for the handling of industrial chemicals
- Decree number 138/1958 amended by Decree 91/1059 and is administered by the Ministry of Industry, regulates importing, handling & using of chemicals

GHS

- Working on enacting legislation at the national level in line with GHS
- Getting support from United Nations Environmental Program (UNEP) to improve customs infrastructure
- Require technical support from UNEP:
  - Development of a chemical database
  - Training on GHS implementation
  - Issuing of GHS guidelines
Resources - Egypt

- Official Gazette (Ministry of Trade and Industry):
  http://www.mfti.gov.eg/english/affiliates/industry/app/services.htm
- Basel Convention Regional Centre for Training and Technology Transfer for Arab States - Egypt: http://www.bcrc-egypt.org/en/
- Federation of Egyptian Industries: http://www.fei.org.eg/ (Arabic)
- Egypt Chamber of Chemical Industries: http://cci-egy.com/

Resources - Egypt

- Egypt Ministry of Industry: http://www.mfti.gov.eg/index.asp
- Egypt National Institute of Occupational Safety and Health (NIOSH):
  http://www.icpsr.org.ma/?Page=showInstitute&InstituteID=NIOSH444&CountryID=Egypt
- Egyptian Environmental Affairs Agency (EEAA): http://www.eeaa.gov.eg/
- Egyptian Hazardous Substances Information and Management System:
  http://www.eeaa.gov.eg/ehsims/
Regulatory Framework

- International Trade Administration Act, 71 of 2002
- Hazardous Substances Act no.15 of 1973
- Safety & Health of workers (Occupational Health and Safety Act) of 1993
- The Department of Agriculture, Forestry and Fisheries (DAFF) and the Department of Environmental Affairs (DEA) and Department of Labor (DOL) are the branches of government that are responsible for environmental health and safety legislations.

International Trade Administration ACT 71, 2002

- International Trade Administration Commission (ITAC) is the authorized body to control import of chemicals which conform to the provisions of the Montreal Protocol and the 1988 United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic substances
- Letter of recommendation from the SA Police Service (SAPS) & the Department of Environmental Affairs (DEA).
- Applications must be submitted via e-mail, mail, or in person, before import
- Custom charges may apply, although there is no registration fees.
Hazardous Substances Act

- Group I and Group II are hazardous substances or mixtures (toxic, corrosive, irritant, strongly sensitizing, flammable, or generating pressure through decomposition or heat);
- Group III are a defined set of electronic products
- Group IV substances are “fabricated radio-isotopes” as defined as “nuclear-hazard material” in section 1 of the Nuclear Energy Act, outside of a power plant, intended for medical, scientific, agricultural, commercial or industrial use
- A license is required for sale of Group I substances and/or for sale, use, or application or installation of Group III substances.
- A license is required to manufacture, purchase, discard, import/export, hold, use or transport any Group IV substance. There is a fee for the authorization of such activities covered by the license.
- The license may be granted indefinitely or with an expiry date.
- Group II hazardous substances do not require license
Hazard Communication

- A 16 section MSDS must be provided free of charge for all hazardous chemical substances

  ➢ SANS 11014-1(2010) Safety data sheet for chemical products - Content and order of Sections (recommended)

- Implementation of UN-GHS in progress

Resources

- Department of labour
Resources


Resources

- South African Bureau of Standards (SABS)
  https://www.sabs.co.za/index.asp

Israel
Regulatory Framework

- Safety at Work Regulation (Material Safety Data Sheets) 1998 but last amended in November 8, 2011 (No: 2181)
- Labor Inspection Regulation (Occupational and Biological Monitoring of those Working with Hazardous Factors), 1990 but was repealed and replaced by a new regulation issued in August 29, 2011 (No: 7028)
- Administered by the Ministry of the Environment & Labor

SDS, Classification, Packing and Labeling and Marking of Packages

- Israel Standard SI 2302 (issued in 2004; updated in 2009; next revision expected in 2014)
  - Part 2: Dangerous substances & preparations: Transportation- sorting, packaging & labeling (The orange book)
- The regulations are based on the standards developed by the International Standard Organization, the American National Standards Institute and the guidelines of the European Commission.

Safety at Work Regulation

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SDS, Classification, Packing and Labeling and Marking of Packages

- 16 Sections
- Hebrew or English
- Upon significant revision, MSDS must be redistributed to any one who has received it within 12 months prior.

Hazardous Substances Law of 1993

- Harmful chemicals which are listed in Schedule One (29 chemicals)
- Poisons which are listed in Schedule Two (219 chemicals plus 286 chemicals listed in Schedule I to the 1996 Hazardous Substances Ordinance (Classification and Exemption))
GHS

- Situational analysis in progress
- Not yet incorporated into Israeli laws or standards
- GHS has begun to be used primarily by exporters
- All transported hazardous substances are marked according to the GHS system of Classification and Labeling of Chemicals

References

SI 2302
- Available through the Israeli Standards Institute
www.sii.org.il/20-EN/SII_EN.aspx
Resources

- Israel Ministry of Environmental Protection

Israel institute for Occupational Safety & Hygiene
http://www.osh.org.il/site/english_main.html
Regulatory Framework

- Regulation of Inventory and Control of Chemicals (December 26, 2008, last amendment on May 23, 2010)
- Regulation on Authoring & Distribution of Safety Data Sheets for Hazardous Substances & Preparations (December 26, 2008)
- Regulation on Classification, Labeling & Packaging of Hazardous Substances & Preparations (December 26, 2008 & DRAFT)
- Regulation on Restrictions for the Manufacture, Marketing and Use of certain Dangerous Substances & Preparations (December 26, 2008)
- Regulation on Control of Large-scale Accidents from Industrial Facilities and possible Hazards (SEVESO II) (August 10, 2010)

Purpose:
- To establish a Chemical Inventory
- Reduce and control against adverse effects that chemicals may cause on human health and the environment
- List of LPV Chemicals (>=1 mta) consists of 2887 substances
- List of HPV Chemicals (>=1000 mta) consists of 599 substances
- A priority list consisting 131 substances

Published and Administered through the Turkish Ministry of Environment & Urbanism (MoEU)
Regulation of Inventory and Control of Chemicals (Exclusions)

- Substances which are subject to customs supervision in transit, provided that they do not undergo a treatment or processing
- Substances produced or imported for use for military purposes
- Substances that are < 1 mta

All other types of chemical substances are under the scope of the regulation

Regulation of Inventory and Control of Chemicals

- This regulation requires that manufacturers and/or importers of substances present on their own or in preparations in quantities greater than 1 ton/annum submit information to the Ministry of Environment & Urbanism
- Information has to be notified through a secure IT system “HEDSET” on MoEU.
Ministry of Environment & Urbanism Portal

Chemical Data Bank (HEDSET)

HEDSET, Secure Access Site

KİMAYASALLAR VERİ BANKASI

Firma Kodu:

Kullanıcı Kodu:

Şifreniz:

giriş
### RICC vs. REACH

<table>
<thead>
<tr>
<th>Topic</th>
<th>Turkish ICC</th>
<th>REACH</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Substances covered</strong></td>
<td>All chemical substances which are not covered under other regulations</td>
<td>New &amp; existing chemical substances which are not covered by other specific regulations &amp; directives</td>
</tr>
<tr>
<td><strong>Threshold limit</strong></td>
<td>Notification: substances &gt;1 tpa</td>
<td>Registration: Substances &gt;1 tpa</td>
</tr>
<tr>
<td><strong>Data reporting</strong></td>
<td>Industry is responsible but authorities keep control</td>
<td>Industry is responsible to submit all the information through SIEF formation</td>
</tr>
</tbody>
</table>

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<tbody>
<tr>
<td><strong>Data sharing</strong></td>
<td>No data sharing (SIEFs) but group submission is allowed</td>
<td>Substance Information Exchange Fora (SIEFs) and joint submission of Registration dossiers</td>
</tr>
<tr>
<td><strong>Confidentiality</strong></td>
<td>Manufacturer or importer shall demand the ministry in writing to keep information confidential</td>
<td>Confidentiality is granted through SIEF agreements and confidentiality flag in registration dossiers</td>
</tr>
</tbody>
</table>
Regulation on Authoring & Distribution of Safety Data Sheets for Hazardous Substances & Preparations

- Hazardous substances & preparations
- Substances & preparations which are not classified as hazardous but which may create a hazard to human health and to the environment within specific concentrations
- Preparations containing a substance which has OEL

Safety Data sheets should be prepared or reviewed by certified experts
Certification is granted through the Turkish Standard Institute
SDS’s & labels must be in Turkish language with Turkish chemical names
R & S phrases should be as used as specified in Annex V & VI of Turkish CLP regulation
### Regulation on Authoring & Distribution of Safety Data Sheets for Hazardous Substances & Preparations

- Should be supplied both in written form and electronically with the first submission and each revision, free of charge.
- An e-copy of SDS should be submitted to the MoEU secure portal.

### MSDS has 16 sections. Section order is same with regards to Annex II of REACH except the inversion of section 2 & 3

1. 2. Composition/Information on ingredient
2. 3. Hazard identification
The CLP Regulation (Draft) is identical to the former Dangerous Substances Directive: Directive 67/548/EEC & Dangerous Preparations Directive: Directive 1999/45/EC. The draft is expected to be finalized by the end of 2013 and will repeal the current CLP in full as of 06.01.2016.
CLP Harmonization Notification & Deadlines

- Manufacturers/Importers can notify the MoEU through Legal Entities (LE)
- Classification, labeling & packaging of Substances: Deadline January 1, 2015
- Classification, labeling & packaging of Mixtures: Deadline June 1, 2016

Notification to C & L Inventory

- Name, address, phone, fax, e-mail of LE, contact person
- Substance identity as given in Art.40
- Classification of the substance in accordance with Art.15
- Reasons if the substance is not classified in accordance with the regulation
- Concentration limit values/M-factor
- Labeling data and Hazard statements
Substances placed on the market before 1.1.2015 are to be notified from 1.1.2014 to 1.1.2015

Substances placed on the market after 1.1.2015 for the first time, have to be notified within one month at the latest

CLP Harmonization / Time table for Substances

|-----------------|-----------------|

*Re-labeling is not required for substances placed on the market before 1.1.2015 until 1.1.2017
**CLP Harmonization / Time table for Mixtures**

- CLP 2008 mandatory/
  CLP 2013 optional
- CLP 2013 mandatory for CL & P

*Re labeling is not required for mixtures placed on the market before 6.1.2016 till 6.1.2018*

**Resources**

Resources

Turkish Gazette [http://www.resmigazete.gov.tr/default.aspx]

Questions?
• Thanks for your Attention