Gaps Assessment and GHS Implementation Roadmap

Côte d'Ivoire

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Gaps Assessment and GHS Implementation Roadmap

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Author(s)	Marco Camboni
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1 Introduction

The implementation of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) is a pivotal endeavour for countries striving to enhance chemical safety and environmental protection. In this context, the "Gaps Assessment and GHS Implementation Roadmap" for Côte d'Ivoire represents a significant initiative under the auspices of the United Nations Environment Programme (UNEP). This document, rooted in the comprehensive baseline assessment completed in August 2023, outlines a strategic approach for integrating GHS within the nation's chemical regulatory framework. This roadmap is the culmination of a collaborative effort with the Ivorian authorities, drawing upon the collective wisdom and experience of international organisations such as UNEP, UNITAR, ILO, and others who have been instrumental in supporting countries on their GHS journey. The roadmap is crafted to address the unique challenges faced by Côte d'Ivoire, while also aligning with global standards in chemical safety.

Central to this assessment are three core areas of concern: the legislative framework, sustainable financing for institutional capacity in chemical management, and the capacity for implementation and enforcement of GHS guidelines. These areas are critical to establishing a robust and effective system for chemical classification and labelling in Côte d'Ivoire. The legislative framework, as it currently stands, is an amalgamation of decrees and national codes dating back several decades, with limited requirements for chemical classification and labelling. A key aspect of the roadmap is the development of new legislation that will align with GHS standards, addressing the gaps in the existing framework. Sustainable financing emerges as a crucial challenge, given the current dependence on the state budget and external grants, with a notable absence of internally generated revenue for chemical management. The roadmap highlights the need for a well-structured financing system, capable of supporting the extensive responsibilities of regulatory authorities in the realm of chemical safety. Moreover, the roadmap underscores the significance of capacity building and training. This includes proposed training initiatives by UNITAR and other international bodies, aimed at equipping Ivorian stakeholders with the necessary skills for effective GHS implementation and enforcement.

In addition, the roadmap emphasizes the development and execution of a comprehensive strategy for raising awareness among various stakeholders, spanning sectors such as agriculture, industry, transport, and consumer products. This strategy is vital for building a widespread understanding of GHS and its impact on chemical safety and environmental protection. The importance of enforcement and compliance is also emphasised, with a call for the development of a thorough enforcement strategy. This includes comprehensive inspection systems to ensure compliance with GHS standards and effective communication of hazard information. Furthermore, the roadmap advocates for international collaboration and information exchange. This includes potential networking with competent authorities in the West African region, facilitated by entities like ECOWAS, to enhance the implementation process. Finally, the establishment of a monitoring, evaluation, and reporting system is suggested to assess the effectiveness of the implemented actions and make necessary adjustments. In conclusion, the Gaps Assessment and Roadmap for GHS implementation in Côte d'Ivoire provide a detailed, strategic blueprint to overcome existing challenges. By outlining key actions, timelines, and resource allocations[1], it sets a clear path for Côte d'Ivoire to achieve compliance with global chemical safety standards, ultimately protecting public health and the environment.

[1] Estimates of human resources are provided in workdays, for less resource-intensive actions, or Full-Time Equivalent (FTE), for resource-intensive actions. One FTE is equal to 220 workdays of an employee working full time per year. Human resources estimates are based on expert judgement, i.e. considering past experiences in different countries. The actual required resources may vary significantly and depend on a number of factors, such as efficiency of each organisation involved and level of complexity of the action.

2 Gaps assessment

The three main gaps in Côte d'Ivoire relate to the legislative framework, the lack of a sustainable financing of institutional capacity for chemicals control, and the capacity to implement and enforce the upcoming requirements on the classification and labelling of chemical products. This section summarises the key findings of the baseline analysis and compares it to an ideal situation where Côte d'Ivoire has a functional and sustainable chemical legislative framework in line with the GHS, the authorities have the capacity to implement and enforce the legislation, businesses are able to classify and label chemical products accordingly, and the public is aware of the chemicals' hazards. This comparison, in turn, has informed the development of the action roadmap.

2.1 Legislative framework

The current chemical regulatory framework covering workplaces, agriculture, transport, and consumer product chemicals is formed of a number of decrees and national codes which were drafted and adopted between the 1960s' and 1990s'. There is no requirement for the classification of chemical products and only limited labelling requirements for certain processes and substances[2], and for pesticides[3]. Regarding the latter, the label of authorised pesticides must appear on the packaging and must provide instructions for use, storage conditions, date of manufacturing, and possible uses of the product.

A new decree titled 'Sale and Manufacture of Chemicals Hazardous to the Environment and Human Health' has been drafted by the Ministry of Environment and Sustainable Development in conjunction with the Ministry of Agriculture and Rural Development, the Ministry of Transport, the Ministry of Industry & Commerce, and the Ministry of Health and Public Hygiene and Universal Health Coverage of Côte d'Ivoire. At the time of writing (January 2024) the decree has not yet been discussed by the Parliament. The key requirement of the draft legislation is for manufacturers, importers, and sellers of chemicals to submit registration dossiers with the following information:

- Commercial name and chemical formula
- Physical and chemical properties (including impurities and additives)
- Packaging
- Planned production/import quantities and uses
- Any known substitutes
- Methods for detecting and measuring the concentration of the substance in mixtures and in the environment
- Results of studies on acute toxicity, corrosion and skin irritation
- Data on mutagenic properties
- Description of the manufacturing process

The draft legislation makes no explicit mention of the GHS; however, it emphasizes the need for appropriate labelling (including the addition of symbols), packaging and safe transport as well as the requirement for data sheets in accordance with the law.

[2] Painting or varnishing spraying work and chemical products containing lead and benzol (Decree No. 67-321 of July 21, 1967).

[3] Decree No. 89-02 of January 4, 1989.

2.2 Sustainable financing of institutional capacity

Chemical companies make profit by producing and importing chemical products and services which are key for any modern economy. The production, import, placing on the market, and use of chemicals require companies to identify and minimise the risks involved. Placing the requirements of classification and labelling on industry stakeholders significantly lowers the costs for the public authorities. However, public authorities still have very important roles to play:

- Developing legislation and guidance
- Providing training and capacity building
- Increasing awareness on the sound management of chemicals
- Ensuring compliance with the legislation

All these tasks have costs that require reliable, secure, and predictable financing sources. The funding of the relevant ministries comes mainly from the state budget, but the allocation is inadequate. Some funding comes from grants from external donors, and there are no internally generated revenues, at least with regard to the management of chemicals.

2.3 Implementation and enforcement capacity

The drafted law and by-laws on chemicals provide for a national committee to be established. During the contractors' visit in Abidjan in June 2023, the possible composition of the GHS Implementation Committee was discussed, and it was suggested to aim for its establishment by the end of the year. Table 2-1 lists the proposed composition of the GHS Implementation Committee.

Table 2-1: Proposed member organisations of the GHS Implementation Committee

Organisation	Department	No. of members
Ministry of Environment and Sustainable Development	Chemicals and Waste Management (Basel Convention Focal Point)	2
	Anti-Pollution Centre	1
	SAICM Focal Point (Rotterdam Convention Focal Point	1
	Stockholm Convention Focal Point	1
Ministry of Agriculture and Rural Development	Pesticides Management	1
Ministry of Transport	Traffic Management	1
	Port Authority	2
Ministry of Trade	Import verification	1
	Fraud and Quality Control	1
Ministry of Employment	Occupational Health and Safety	1
Ministry of Health, Public Hygiene and Universal Health Coverage	Pharmaceutical Regulatory Authority	1
Ministry of Budget and State Portfolio	Customs	1
Ministry of Trade and Industry	Standards Management	1
	Product Quality Control	1
Ministry of Education	Curricula Development and Training	1
Academia	Chemical Engineering	2
Vocational Training Ministry	Training	1
Defence Ministry	Chemical Weapons	1
Private Sector	Business Confederation	1

Table 2-1: Proposed member organisations of the GHS Implementation Committee		
Organisation	**Department**	**No. of members**
	Trade and Industry Chamber	1
	Crop Life	2
	Private Transporters	1
Civil Society	Labour organisations (chemicals workers, sellers,…)	2
	CASE (IPEN)	1
	JVE (NGO)	1
	FEREADD (NGOs association)	2

The following subsections summarise the knowledge and capacity of public authorities, industry stakeholders, and the civil society regarding GHS implementation.

2.3.1 Public authorities

The division of responsibilities across government ministries in terms of the four sectors affected by the GHS (workplaces, agriculture, transport, and consumer product chemicals) is well defined. This however may also impact how legislation of the different sectors is developed. Because of the horizontal nature of the GHS, any regulatory framework would benefit from a more concerted effort. This highlights the importance of having a GHS implementation committee.

The relevant public authorities are understaffed and lack knowledge of the legal and technical aspects of GHS implementation in all four sectors. Also, with regard to enforcement, public authorities' staff lack legal and technical knowledge.

2.3.2 Business and industry

Multinational chemical companies operating in Côte d'Ivoire use chemical hazard communication tools compatible with GHS provisions, including safety data sheets and labels. These are likely to be used throughout their supply chains. However, workers of companies acquiring and providing goods and services[4] to and from these companies in Côte d'Ivoire — in other words, Ivorian upstream and downstream businesses not part of these large chemical business groups — may not be trained to understand the SDSs and labels and act accordingly. National manufacturers and importers of chemical products may be familiar with GHS hazard communication tools but may not implement them systematically.

The combined efforts of public authorities and industry associations is needed to raise awareness and support capacity building in industry stakeholders. There are a number of business associations that can contribute towards this goal. These are:

- The General Confederation of Enterprises in Côte d'Ivoire (CGECI)
- The Ivorian Federation of Small and Medium Enterprises (FIPME)
- CropLife Côte d'Ivoire
- The National Federation of Traders of Côte d'Ivoire (FENACCI)
- The Employers' Federation (UCCI)
- The Union of Traders of Côte d'Ivoire (UCCI)
- The Chamber of Commerce and Industry of Côte d'Ivoire

[4] Including transport services and logistics.

CropLife Côte d'Ivoire in particular may have relevant expertise in training and capacity building, and knowledge of the GHS.

2.3.3 Civil society

There are two NGOs that have collaborated with IPEN on chemical risk management projects. These are the *Centre Africain pour la Santé Environnementale* (CASE)[5] and the Young Volunteers for the Environment (JVE)[6].

Another important player could be the Université Félix Houphouët-Boigny (UFHB), which offers courses on sciences, technology, and sustainable agriculture.

[5] https://www.afceh.org

[6] Jeunes Volontaires pour l'Environnement Côte d'ivoire (jvecotedivoire.org)

3 GHS National Implementation Roadmap

3.1 Overview

Implementing the GHS involves a series of steps and actions to ensure compliance with international standards and the safety of workers, consumers, and the environment. The proposed national roadmap is structured as follows:

1) **Preparatory steps.** Establish the GHS Implementation Committee and organise a workshop to launch the roadmap and obtain the support of senior representatives from the public and private sectors.
2) **GHS-based regulatory framework and implementing activities.** Develop the legislation on the classification and labelling of chemical products and accompanying guidance document. Establish a technical committee to keep the legislation up-to-date and ensure coherence of other legislative acts.
3) **Capacity Building and Training**. Identify and train representatives of relevant ministries and government agencies, industry, and other stakeholders on the GHS principles and requirements.
4) **Raise awareness**. Implement a comprehensive hazard communication programme to educate workers, consumers, and emergency responders about the new labelling and safety data sheet requirements. Engage with industry, trade associations, labour unions, and civil society to raise awareness about GHS and gather feedback for continuous improvement.
5) **Enforcement and compliance**. Develop an enforcement framework to monitor and ensure compliance with GHS requirements.
6) **International collaboration.** Collaborate with neighbouring African nations and other partners to ensure regional harmonization and facilitate cross-border trade.
7) **Monitoring and reporting.** Provide reports and updates to international organisations to demonstrate Côte d'Ivoire's commitment to GHS compliance.

This roadmap serves as a guideline for implementing the GHS in Côte d'Ivoire. The process will require close collaboration between ministries, industry stakeholders, and the public to ensure successful adoption and continuous improvement of chemical safety standards.

3.2 Key element 1: preparatory steps

3.2.1 Action 1.1: Establish the GHS Implementation Committee

It is recommended that the Ministry of Environment and Sustainable Development takes the responsibility for the coordination of the GHS Implementation Committee. A list of 31 people from different institutions has been proposed. Some have been identified as they are the focal points for the Multilateral Environmental Agreements that have been ratified, others still have to be named. The proposed composition is suitable, but it is recommended that the individuals that will be called to be part of the Committee have the right expertise and knowledge to carry out the actions of this roadmap. For example, from the Ministry of Budget and State Portfolio it is important to select one Customs official but also a representative working on establishing the national budget. It is recommended to ensure the gender balance of the Committee.

It is suggested to form a sub-committee composed of the representatives from the Ministry of the Environment and Sustainable Development, the Ministry of Transport, the Ministry of Budget and

State Portfolio, the Ministry of Trade and Industry, the Ministry of Health[7], Public Hygiene and Universal Health Coverage and the Ministry of Labour.[8] This sub-committee should work on drafting the legislation and guidance on the classification and labelling of chemical products, and should report to the plenary (see Action 2.1).

3.2.2 Action 1.2: Organise a national GHS workshop

The long-term commitment of all actors is crucial, as it ensures the mobilisation of the required resources. It is recommended that the chair of the GHS Implementation Committee, the Ministry of Environment and Sustainable Development, organises a national workshop aimed primarily at senior representatives of the public and private sectors, as their support and endorsement of the roadmap is key to start the implementation process. Such a workshop could also include development partners, such as the delegation of the European Union in Côte d'Ivoire, the UN Resident Coordinator in Côte d'Ivoire and other international partners (e.g. the German ambassador in Côte d'Ivoire[9]).

The main objective of the event is to get the endorsement of senior representatives of the government, parliament, and relevant ministries. By raising the awareness of policymakers on the importance of the GHS, the workshop could ensure a speedier adoption by the Ivorian Parliament. The workshop could also be used to announce publicly the GHS Implementation Roadmap. The Project Steering Board and the contractor can support the Ministry of Environment and Sustainable Development in structuring the programme and defining major needs in terms of persons, infrastructures, and materials. Following the event, the contractor may have to revise the roadmap to consider the suggestions of the participants.

Table 3-1 summarises action owner, required resources and time target for this first action.

Table 3-1: GHS key element 1: Preparatory steps

Action		**Action owner and support**						**Required resources**		
1.1 Establish the GHS Implementation Committee		The Ministry of Environment and Sustainable Development								
1.2 Organise a national GHS workshop		The Ministry of Environment and Sustainable Development, with the support of the GHS Implementation Committee, the Project Steering Board and the contractors						Financial resources: ~€5,000		
Target	**2024 Q1**	**2024 Q2**	**2024 Q3**	**2024 Q4**	**2025 Q1**	**2025 Q2**	**2025 Q3**	**2025 Q4**	**2026 Q1**	**2026 Q2**
Action 1.1	X									
Action 1.2	X									

[7] The representative of the Directorate of Hygiene and Health - Environment, Ministry of Public Health and Hygiene who is part of the WHO Chemical Risk Assessment Network (https://cdn.who.int/media/docs/default-source/chemical-safety/chemical-risk-assessment-network/chemical_risk_assessment_network_participants_1mar2023.pdf?sfvrsn=7c6bdc62_4) should be the one involved in the Committee.

[8] The first five ministries are already the co-signatories of the draft law on the sound management of chemicals.

[9] ICCA and the German Federal Ministry for the Environment funded a cooperation project on the GHS implementation in Côte d'Ivoire.

3.3 Key element 2: GHS-based regulatory framework and implementing activities

3.3.1 Action 2.1: Develop the legislation on the classification and labelling of chemical products

It is recommended that the GHS Implementation Committee develops the legislation on the classification and labelling of chemical products, with the support of the Project Steering Board. This is an outline of the steps to be followed:

- **Define scope and purpose**: Clearly define the scope of the legislation, providing unambiguous definitions and specifying which chemical products are outside the scope (e.g. medicinal products, veterinary medicinal products, cosmetic products, food and feed stuffs). Clarify the purpose of the legislation, emphasizing the need for use of hazard information, classification, and labelling.
- **Classification and labelling**: Include requirements for manufacturers, importers, and suppliers to classify chemical products and label them accordingly.
- **Reference international standards**: Explicitly state that hazard assessments, classification, and labelling shall be done in accordance with internationally recognized standards, such as the GHS.
- **Safety Data Sheets (SDSs):** Include the obligation for importers and suppliers to provide SDSs and reference the requirements as per the GHS.
- **Storage and transportation requirements**: Include requirements for importers, producers, users, and distributors to follow standard protocols for storage and transportation, including proper signage, records of transport, and the use of specific safety equipment and vehicles.
- **Reporting Requirements**: Include provisions allowing governing bodies to request information related to chemicals and define the conditions under which such information can remain confidential. Oblige industry and other parties to report any new information related to the risk assessment of chemicals.
- **Harmonised classification and labelling**: Consider the inclusion of requirements for the competent authorities[10] to propose harmonised classification and labelling for substances that fulfil the classification criteria for respiratory sensitisation (category I), germ cell mutagenicity (category 1A, 1B or 2), carcinogenicity (category 1A, 1B or 2), reproductive toxicity (category 1A, 1B or 2), active substances used in biocidal products and plant protection products, and other substances to be selected on a case by case basis[11].
- **Evaluation**: Define the purpose of evaluation, responsibilities, and methods. Encourage the use of evaluations done in other jurisdictions to minimize resources.
- **Packaging**: Consider the inclusion of requirements about the characteristics of packaging for certain chemical products.
- **Advertising**: Include provisions for controlling advertising, designating the authority for enforcement, and prohibiting misleading or false advertising.
- **Training**: Include requirements for the regular training of employers and employees.
- **Offences and penalties**: Define offences, categorise them as criminal or administrative, and establish penalties for non-compliance with the legislation.

[10] The Ministry of Agriculture and Rural Development, which manages pesticides, and the Ministry of the Environment and Sustainable Development, which could propose for harmonised classification and labelling any other substance.

[11] While Ivorian authorities may develop hazard assessment capacity over time, in proposing substances for harmonised classification and labelling they should consider referencing already developed lists of substances, such as the EU CLP one.

- **Sanctions**: Allow for sanctions in cases of continual non-conformance with orders.
- **Inspections and enforcement**: Identify the authorities responsible for inspections, specifying their obligations and powers.
- **Appeals**: Set out procedures for appeals against sanctions and negative administrative decisions.
- **Miscellaneous provisions**: Address issues that do not fit into other categories but are important for the legislation.
- **Entry into force and application**: Clearly state when the legislation comes into force and consider whether to provide transitional provisions for the classification and labelling of mixtures.

It is suggested to include the institutional framework and principles in a law, while the more technical details (such as the classification criteria, the pictograms, etc.) could be provided in a guidance document or code of practice. This is, for example, the set up followed by Malaysia[12].

3.3.2 Action 2.2: Develop a guidance document

It is recommended that the GHS Implementation Committee develops a guidance document illustrating the classification and labelling processes and providing the classification criteria and labelling elements. It is suggested that the same sub-committee in charge of developing the legislation works in parallel on the guidance document. Periodically (every one or two months), the draft guidance document is shared with the GHS implementation Committee for comments and suggestions. Every four months, the draft guidance document is shared with the Project Steering Board for comments and suggestions. This also enables the monitoring of the action progress.

3.3.3 Action 2.3: Consider proposing substances with harmonised classification and labelling

To ensure an adequate risk management, the Ministry of Environment and Sustainable Development and the Ministry of Agriculture and Rural Development should consider proposing harmonised classification and labelling (CLH) for substances with hazards of the highest concern (carcinogenicity, mutagenicity, reproductive toxicity and respiratory sensitisers, active substances of biocidal and plant protection products). The GHS Implementation Committee will have to decide how often to propose CLH substances and how to publish the list, e.g. in the guidance document[13]. It is suggested that the GHS Implementation Committee consult the European Chemicals Agency (ECHA) on how to implement the process. Moreover, the GHS Implementation Committee could screen the list of CLH substances in the European Union, identify those that are also used in Côte d'Ivoire and propose the same CLH.

3.3.4 Action 2.4: Apply to become observers in the United Nations Sub-Committee of Experts on the GHS, and the United Nations Subcommittee of Experts on the Transport of Dangerous Goods

The GHS is in constant evolution and is *updated, revised and improved every two years as needs arise and experience is gained in its implementation*.[14] The two groups tasked with the maintenance,

[12] Occupational Safety and Health Act 1994. Occupational safety and health (classification, labelling and safety data sheet of hazardous chemicals) regulations 2013.

[13] As, for example, Part 1 of the Industry Code of Practice on chemicals classification and hazard communication in Malaysia.

[14] https://unece.org/about-ghs

updating and promotion of the GHS are the United Nations Sub-Committee of Experts on the GHS (UNSCEGHS), and the United Nations Subcommittee of Experts on the Transport of Dangerous Goods (UNSCETDG). Countries may apply to become observers or full members. For the latter, countries need to commit to participate on a regular basis.

It is recommended that Côte d'Ivoire applies to become an observer in both groups. The members of the sub-committee set for developing the legislation and guidance document (Actions 2.1 and 2.2) (representatives from the Ministry of the Environment and Sustainable Development, the Ministry of Transportation, the Ministry of Budget and State Portfolio, the Ministry of Trade and Industry, the Ministry of Health, Public Hygiene and Universal Health Coverage and the Ministry of Labour) could be tasked with this responsibility. Their participation in the two groups would ensure that the sub-committee is able to keep legislation, standards and guidance documents up to date.

3.3.5 Action 2.5: Establish a sustainable financing system for chemicals control

It is recommended that the GHS Implementation Committee carries out an analysis of the costs of the infrastructures necessary to ensure the functioning of the chemicals control system.

It is advisable to estimate the costs of the whole national chemicals management system and decide on the allocation to different activities (including GHS-related activities) on an annual or biannual basis. The main elements of a chemicals management system are:

- Identification and assessment of chemicals hazardous properties and risks.
- Dissemination of hazard, risk, and safety information.
- Making informed choices about chemicals to be placed on the market.
- Organisation of workers and public safety.
- Compliance monitoring.[15]

The costs related to the implementation and enforcement of the GHS-based legislation are:

- Costs related to the functioning of the GHS Implementation Committee and any future sub-committee.
- Costs of developing and updating the legislation, standards, and guidance documents.
- Costs of gathering hazard classifications of chemical products.
- Costs of proposing harmonised classification and labelling for certain chemical products.
- Costs of inspections and verification of the adequacy of hazard classifications and labelling of chemical products on the market.
- Costs of communication activities (workshops, leaflets, maintenance of webpages, helpdesks, etc.).

The analysis of the costs needs to be matched with an analysis of the possible funding sources. In general, these can be:

- Allocations from the state budget
- Internally generated revenues
- External funding

[15] UNEP 2015. UNEP guidance on the development of legal and institutional infrastructures and measures for recovering costs of national administration for sound management of chemicals. Table 1 at page 20 lists the key activities for each main element of the management system.

To estimate the internally generated revenues, the competent authorities need the following information: number of duty-holders that will have to classify and label chemical products (and notify this information if required by the legislation) and number of chemical products placed on the market. It is suggested that the competent authorities work with industry stakeholders to arrive to an estimate. They will then be able to define the value of the fee per service provided.

While the competent authorities can lobby the government to receive a higher share of resources to dedicate to chemicals management, and can engage with international donors on specific projects, their biggest leverage is in the internally generated revenues, and more precisely in their power to establish fees to cover for their administrative services. Once the GHS implementation Committee has a clear understanding of the possible costs and internally generated revenues, it should be possible to estimate the total annual funding (considering also the national budget allocation and grants from international donors) and plan implementing and enforcing activities for the short-medium term (five years). Importantly, fees can be remodulated to cover the costs of implementing GHS-related activities and to adjust the mix of funding sources.

The 'optimal' mix of sources needs to be defined in consideration of the nature of the activities that the GHS Implementation Committee and its members will have to implement. Allocation of resources from the state budget should cover activities such as the establishment, maintenance and refinement of the legal framework, the communication and exchange of information about chemicals management with a wider audience than the fees-paying companies, and regional or international collaboration initiatives. Internally generated revenues should be 'ear-marked' for chemicals management. External funding (such as the Global Environmental Facility grants, the UN special Programme development projects, and other types of funding provided by countries offering bilateral support) can be used in the short term to build capacity but should not be relied upon in the long term[16,17].

The GHS Implementation Committee should also reconsider over time the fee values, not just in terms of cost coverage, but also in terms of their effect on compliance and general response of the companies. For example, the Committee may like to consider remodulating the fees according to the size of the companies, quantities of chemicals traded, etc.

Table 3-2 summarises action owners, required resources and time targets for the actions in this roadmap key element.

Table 3-2: GHS key element 2: GHS-based regulatory framework and implementing activities

Action	Action owner and support	Required resources
2.1 Develop the legislation on the classification and labelling of chemical products	The GHS Implementation Committee (through a sub-committee composed of the representatives from the Ministry of the Environment and Sustainable Development, the Ministry of Transportation, the Ministry of Budget and State Portfolio, the Ministry of Trade and Industry, the Ministry of Health, Public Hygiene and Universal	1 Full-Time Equivalents (6 people x 0.16 FTE x 1 years)

[16] Strategic Approach to International Chemicals Management (SAICM), & United Nations Environment Programme (2022). *Study on Industry Involvement in the Integrated Approach to Financing the Sound Management of Chemicals and Waste - April 2022*. https://wedocs.unep.org/20.500.11822/40069.

[17] KEMI (2020). Financement durable des capacités institutionnelles pour le contrôle des produits chimiques. Orientation sure le contrôle national des produits chimiques. Available at: https://www.kemi.se/download/18.39a6b9eb175a977d0432ede/1607684782725/guide-1-financement-durable.pdf

Table 3-2: GHS key element 2: GHS-based regulatory framework and implementing activities										
		Health Coverage and the Ministry of Labour) with the support of the Project Steering Board.								
2.2 Develop a guidance document		The GHS Implementation Committee (through a sub-committee composed of the representatives from the Ministry of the Environment and Sustainable Development, the Ministry of Transportation, the Ministry of Budget and State Portfolio, the Ministry of Trade and Industry, the Ministry of Health, Public Hygiene and Universal Health Coverage and the Ministry of Labour) with the support of the Project Steering Board.						2 Full-Time Equivalents (6 people x 0.16 FTE x 2 years)		
2.3 Consider proposing substances with harmonised classification and labelling		The Ministry of Environment and Sustainable Development and the Ministry of Agriculture and Rural Development screens the list of CLH substances in the Classification and Labelling Inventory maintained by ECHA, identify substances also used in Côte d'Ivoire and implement the same CLH. ECHA could provide training on harmonised classification and labelling.						0.25 FTE per year		
2.4 Apply to become observers in the United Nations Sub-Committee of Experts on the GHS, and the United Nations Subcommittee of Experts on the Transport of Dangerous Goods		The GHS Implementation Committee.						-		
2.5 Establish a sustainable financing system for chemicals control		The GHS Implementation Committee, led by the Ministry of Budget and State Portfolio. The Project Steering Group and some of its members (e.g. ECHA) can also provide advice.						-		
Target	**2024 Q1**	**2024 Q2**	**2024 Q3**	**2024 Q4**	**2025 Q1**	**2025 Q2**	**2025 Q3**	**2025 Q4**	**2026 Q1**	**2026 Q2**
Action 2.1								X		
Action 2.2								X		
Action 2.3								X		
Action 2.4								X		
Action 2.5								X		

3.4 Key element 3: Capacity Building and Training

3.4.1 Action 3.1: Define training needs and identify representatives to undertake training

It is recommended that the GHS Implementation Committee define the training needs of each organisation member of the Committee and identify two representatives per organisation to be trained. The training of two people per organisation should ensure that the knowledge and skills built through training are not lost because of staff turnover[18]. Given the limited resources available and the need for training a wide cohort of people, it is recommended to follow a 'train-the-trainers' model.

[18] People retiring or moving to other positions or organisations.

This implies that the people selected to undertake the training in each organisation should be confident and skilled public speakers / communicators as a minimum and should undertake to train further colleagues in their units or stakeholder groups.

UNITAR provides a GHS e-learning course of 10 weeks which runs twice a year, starting every March /April and September/October. This is a comprehensive course encompassing all technical elements of the GHS. It is recommended that three representatives of the Ministry of the Environment and Sustainable Development and two representatives of the Ministry of Agriculture and Rural Development undertake the course.[19] This training would also be very useful for all industry representatives responsible for the classification and labelling of chemical products, and for consultancies interested in providing these services.

Not all stakeholders require training on all technical elements. Table 3-3 lists webinars and training materials available at UNITAR (highlighted in green) and ideas for tailor-made GHS courses that could be developed and implemented. The latter could also be developed and offered by ICCA/Cefic, ECHA and other international partners. It also provides suggestions on the target audience and indicative time of implementation. The GHS Implementation Committee should consider the priorities and propose trainees and discuss implementation times with the Project Steering Board.

Table 3-3: Indicative list of training courses with suggested participants and time of implementation

Trainings	Suggested stakeholders	Suggested implementation time
UNITAR GHS e-learning course https://event.unitar.org/full-catalog/classifying-and-labelling-chemicals-according-un-ghs-18-september-1-december-2023	The Ministry of the Environment and Sustainable Development and the Ministry of Agriculture and Rural Development	Q2 2024[20]
Legislation of chemicals placed on the market https://event.unitar.org/full-catalog/legislation-chemicals-placed-market-course	All members of the GHS Implementation Committee	Q1-Q2 2024
Risk Reduction of Chemicals https://event.unitar.org/full-catalog/risk-reduction-chemicals-course	All members of the GHS Implementation Committee	Q1-Q2 2024
Enforcement of chemicals legislation https://event.unitar.org/full-catalog/enforcement-chemicals-legislation-course	General inspectorates of the Ministry of the Environment and Sustainable Development and the Ministry of Agriculture and Rural Development, UNIPOL	Q3-Q4 2024
Sustainable Financing of Institutional Capacity for Chemicals Control https://event.unitar.org/full-catalog/sustainable-financing-institutional-capacity-chemicals-control-course	All members of the GHS Implementation Committee	Q1-Q2 2024
Training on emergency response and sources of emergency response information	Poison centre (yet to be established), emergency responders	Q3-Q4 2024

[19] The course is currently available in English and Spanish, but UNITAR will make it available in French.

[20] Only representatives with a working knowledge of English or Spanish.

Table 3-3: Indicative list of training courses with suggested participants and time of implementation		
Trainings	**Suggested stakeholders**	**Suggested implementation time**
Developing, reading and interpreting Safety Data Sheets	All stakeholders, including poison centre and emergency responders.	Q3-Q4 2024
Understanding labels	All stakeholders, including poison centre and emergency responders.	Q3-Q4 2024
Training on stakeholder engagement	The Ministry of the Environment and Sustainable Development	Q1-Q2 2025

The list of representatives selected to undertake the training should be ready by the start of the first quarter of 2024. UNITAR could support the GHS Implementation Committee by holding a call to explain the content, modules, prior knowledge /skills required, and duration of each course.

3.4.2 Action 3.2: Undertake UNITAR training courses

All selected representatives undertake UNITAR training courses. It is suggested that the representatives of the Ministry of the Environment and Sustainable Development and the Ministry of Agriculture and Rural Development with a working knowledge of English or Spanish use the scholarships[21] available on the UNITAR GHS e-learning course starting in February/March 2024 or in September 2024. All GHS Implementation Committee members should undertake the three courses available online upon registration on legislation of chemicals placed on the market, risk reduction of chemicals, and sustainable financing of institutional capacity for chemicals control. These take 45 minutes each and provide the bases for the Committee to discuss and develop the national framework. The inspectorates of the Ministry of the Environment and Sustainable Development and the Ministry of Agriculture and Rural Development and UNIPOL should also undertake the online course on the enforcement of chemicals legislation. Importantly, participants should be committed to attend UNITAR training until the end. Drop-off from the training courses should be monitored, reported to the Project Steering Board and the underlying issues discussed.

3.4.3 Action 3.3: The 'trained trainers' deliver the training in their organisations

The representatives who have finalised the UNITAR GHS e-learning course should train their colleagues as soon as their own training is complete, so that the knowledge and skills acquired are still 'fresh' and the risk of losing skilled resources through staff turnover is minimised. The participants to the UNITAR GHS e-learning course receive a pdf document at the end. While this document is not in an adequate format to be used for training, it can be used to develop training material. Moreover, UNITAR will develop further training material which will be accessible for free.

The training courses implemented by the trained personnel should be evaluated by the participants through satisfaction surveys. Moreover, the participants could complete UNITAR final exams, which could help to establish whether the courses have achieved the expected results.

3.4.4 Action 3.4: Training and capacity building by ECHA, the Commission, ICCA/Cefic and other institutions

Beyond UNITAR, other members of the Project Steering Board, in particular ECHA, the Commission and ICCA/Cefic can provide training and capacity building. This could take the form of site visits (in

[21] A total of five are available.

Finland and Belgium) by the Ivorian authorities, or series of webinars on specific topics. The key ministries would greatly benefit from the expertise of these institutions' experts.

Topic that could be discussed are the functioning of the CLP Regulation (Classification and Labelling Inventory, harmonised classification and labelling, new hazard classes added to the EU system, poison centres, Enforcement Forum) (with ECHA), and the synergies between CLP and other legislation (with the Commission). ICCA/Cefic and its members could describe best industry practices from the classification and labelling of chemical products. Moreover, EU Member State enforcement authorities could also offer to describe their enforcement processes and practices, recurrent issues and ways forward.

It is recommended that large international chemical manufacturers and distributors which operate in Côte d'Ivoire (e.g. Bayer West-Central Africa, BASF Ivory Coast) provide training on the GHS (e.g. developing, reading and interpreting Safety Data Sheets, understanding labels) to their local suppliers and clients. The training could be organised by ICCA and Cefic in collaboration with the local business associations (e.g. CropLife Côte d'Ivoire).

Table 3-4 summarises action owners, required resources and time targets for the actions in this roadmap key element.

Table 3-4: GHS key element 3: Capacity building and training

Action	Action owner and support	Required resources
3.1 Define training needs and identify representatives to undertake training	The GHS Implementation Committee, with the support of UNITAR	10 working days
3.2 Undertake UNITAR training courses	Individuals selected to undertake the trainings	Five scholarships available. Additional €20,000 could be dedicated to train additional workforce.
3.3 The 'trained trainers' deliver the training in their organisations	Trained trainers in their own organisations, with the support of UNITAR	2.5 FTEs (0.125 FTE x 20 people) ~€10,000
3.4 Training and capacity building by ECHA, the Commission, ICCA/Cefic and other institutions	The GHS Implementation Committee selects the delegates. ECHA, the Commission and Cefic organise the agenda.	~€10,000

Target	**2024 Q1**	**2024 Q2**	**2024 Q3**	**2024 Q4**	**2025 Q1**	**2025 Q2**	**2025 Q3**	**2025 Q4**	**2026 Q1**	**2026 Q2**
Action 3.1	X									
Action 3.2										
Action 3.3										
Action 3.4										

3.5 Key element 4: raise awareness

3.5.1 Action 4.1: Develop and implement a communication strategy

Following the training of representatives from the Ministry of Environment and Sustainable Development and other members of the GHS Implementation Committee, these should work on a communication strategy.

The strategy should aim to increase awareness of the GHS across stakeholders and the wider population, but should also include communication about the working procedures of the authorities and the procedures to manage confidential business information. This would ensure transparency and provide trustworthiness of the authorities. The perception and understanding of industry stakeholders of the efficiency of the competent authorities is an important step towards ensuring regulatory compliance. The authorities should inform industry stakeholders about their upcoming responsibilities and duties with regard to classification and labelling.

The communication strategy could cover the following elements:

- Organisation of **workshops and events**, including identification and selection of topics of interest for the Ivorian stakeholders that could be discussed during the events;
- Communication of information on upcoming industry responsibilities and duties; and
- The dissemination of **information online**: the development of a website (maintained for example by the Ministry of Environment and Sustainable Development) that could be organised by topics to facilitate access to documents and deadlines. A webpage should be dedicated to the Helpdesk and have contact details and a Frequently Asked Questions (FAQ) section, which could assist companies and the public.

The development of a communication strategy can be broken down in six steps:

- Definition of strategy's goals and target audiences.
- Survey of the needs and topics of interest and definitions of the communication objectives.
- Identification of the communication channels.
- Allocation of resources for a multiannual plan.
- Definition of evaluation measurements (e.g. number of participants to communication events).
- Implementation of the communication strategy.

Table 3-5 summarises action owners, required resources and time targets for the actions in this roadmap key element.

Table 3-5: GHS key element 4: raise awareness

Action	**Action owner and support**							**Required resources**		
4.1 Develop and implement a communication strategy	The four technical sub-committees of the GHS Implementation Committee. Support from the Project Steering Board.							~€20,000		
Target	**2024 Q1**	**2024 Q2**	**2024 Q3**	**2024 Q4**	**2025 Q1**	**2025 Q2**	**2025 Q3**	**2025 Q4**	**2026 Q1**	**2026 Q2**
Action 4.1										
Action 4.2										

3.6 Key element 5: Enforcement and compliance

3.6.1 Action 5.1: Develop an enforcement strategy

It is recommended that the GHS Implementation Committee develops an enforcement strategy. A comprehensive inspection system is an essential component of the legislative framework and has the objective to ascertain whether duty-holders have the skills and processes in place to ensure the correct communication of hazard information to all actors in their supply chains. Enforcement of the

chemical management legislative framework in Côte d'Ivoire is the primary responsibilities of the inspectorates of each ministry and the Customs' authorities. The police (in particular the police unit against pollution – UNIPOL) may also support when required (serious breaches of the laws resulting in criminal charges, or checking transport documents). The strategy should cover all intervention points: primary supply (manufacturers and importers), transport and storage (logistics and transport service suppliers), the point of sales (distributors and retailers), and the point of uses (industrial and professional users of chemical products), and set targets (number of inspections in different sectors per year). The strategy should also ensure the coverage of large, medium and small enterprises. Importantly, the strategy should ensure the coordination of enforcement authorities, avoiding that the same entity is inspected by more than one inspectorate on classification and labelling requirements.

The Enforcement Forum hosted by ECHA has developed a number of documents and coordinated various enforcement projects over the last 15 years. The Forum could hold a workshop[22]/webinar to support the Ivorian enforcement authorities in developing the enforcement strategy.

3.6.2 Action 5.2: Implement the enforcement strategy

The enforcement strategy is also a tool for increasing awareness of all duty-holders with regard to their requirements on classification and labelling of chemical products. In the first phase of the enforcement campaign, the authorities may want to use issue notifications of non-compliance, explaining how the classification and labelling of the chemical products inspected do not conform to the GHS and the steps to align the hazard communication tools. The notifications should be followed up to verify compliance. The authorities may want to follow this 'educational' approach in particular with regard to mixtures, where the capacity of industry stakeholders to classify and label accordingly mixtures needs to be built over time.

In a second phase, the authorities may want to increase the number of 'surprise' site inspections, issue fines and prosecute non-compliances. Whatever phase the enforcement strategy is in, inspections following reported problems should be carried out systematically, and situations where there is a danger for human health or the environment prosecuted.

Table 3-6 summarises action owners, required resources and time targets for the actions in this roadmap key element.

Table 3-6: GHS key element 5: Enforcement and compliance

Action	Action owner and support							Required resources		
5.1 Develop an enforcement strategy	The GHS Implementation Committee, with support from the Enforcement Forum hosted by ECHA							0.5 FTE		
5.2 Implement the enforcement strategy	Ministries' inspectorates, Customs, police							-		
Target	**2024 Q1**	**2024 Q2**	**2024 Q3**	**2024 Q4**	**2025 Q1**	**2025 Q2**	**2025 Q3**	**2025 Q4**	**2026 Q1**	**2026 Q2**
Action 5.1										
Action 5.2										

[22] This could be held in the context of the visit of the Ivorian authorities to ECHA, for example.

3.7 Key element 6: International collaboration

3.7.1 Action 6.1: Exchange information with the other three beneficiaries of the four-year pilot projects

It is recommended that a series of four (in presence) events are organised, during which the chairs of the respective GHS Implementation Committees present on the progress with the action roadmaps. This format would allow the beneficiaries to share the issues and barriers encountered and discuss possible ways forward together with the Project Steering Board. The events should be organised by each beneficiary in turn, with the support of the Project Steering Board.

3.7.2 Action 6.2: Exchange information with regional partners

One of the objectives of the pilot project is to generate a regional 'aspiration' effect encouraging other countries to follow suit in the implementation of the GHS. While developing the list of members of the GHS Implementation Committee, the Ivorian authorities have consulted the competent authorities in Ghana. This type of collaboration could be facilitated by organising a network of competent authorities in the West Africa region. These could be invited as observers to the event for exchanging information on the progress with the beneficiaries' action roadmaps to be organised in Côte d'Ivoire or Ghana. It is recommended that the Project Steering Board facilitates the establishment of the network by approaching The Economic Community of West African States (ECOWAS). Table 3-7 summarises action owners, required resources and time targets for the actions in this roadmap key element.

Table 3-7: GHS key element 5: Enforcement and compliance

Action	**Action owner and support**							**Required resources**		
6.1 Exchange information with the other three beneficiaries of the four-year pilot projects	The GHS Implementation Committee, with support from the Project Steering Board							~€5,000		
6.2 Exchange information with regional partners	The Project Steering Board							-		
Target	**2024 Q1**	**2024 Q2**	**2024 Q3**	**2024 Q4**	**2025 Q1**	**2025 Q2**	**2025 Q3**	**2025 Q4**	**2026 Q1**	**2026 Q2**
Action 6.1				X		X		X		X
Action 6.2										

3.8 Key element 7: Monitoring, evaluation and reporting

3.8.1 Action 7.1: Establish a monitoring, evaluation and reporting system

It is recommended that the GHS Implementation Committee establishes a monitoring, evaluation and reporting system for the action roadmap and, more in general, the implementation and enforcement of the GHS. Table 3-8 suggests possible indicators to track the progress of each action.

Table 3-8: Action roadmap and monitoring indicators	
Action	**Suggested indicators**
1. Preparatory steps	
1.1 Establish the GHS Implementation Committee	The GHS Implementation Committee is officially established and functioning.
1.2 Implement a national GHS workshop	- Preparatory phase (concept and characterisation) completed - Preparatory phase (marketing & communications) completed - Implementation phase (management & logistics) completed - Steering & closing phase (Co-ordination & quality assurance) completed. The GHS workshop is successfully implemented
2. GHS-based regulatory framework and implementing activities	
2.1 Develop the legislation on the classification and labelling of chemical products	- The draft law on the classification and labelling of chemical products is submitted to the Parliament - The law is adopted by the Parliament
2.2 Develop a guidance document	- Objectives and target audience are established - Section on the physical hazards classification criteria is finalised - Section on the health hazards classification criteria is finalised - Section on the environmental hazards classification criteria is finalised - Section on the classification of mixtures is finalised - Section on the development of Safety Data Sheets is finalised - Section on the labelling is finalised - Section on transport is finalised
2.3 Propose substances with harmonised classification and labelling	- The Ministry of Environment and Sustainable Development and the Ministry of Agriculture screen the list of CLH substances maintained by ECHA and identify substances used in Côte d'Ivoire - No. of CLH substances proposed by the Ministry of Environment and Sustainable Development - No. of CLH substances proposed by the Ministry of Agriculture (plant protection product active substances) - No. of CLH substances adopted
2.4 Apply to become observers in the United Nations Sub-Committee of Experts on the GHS, and the United Nations Subcommittee of Experts on the Transport of Dangerous Goods	- Côte d'Ivoire applies to become observer in the GHS committees
2.5 Establish a sustainable financing system for chemicals control	- Cost analysis is completed - Revenue analysis is completed - An 'optimal' mix of funding sources is established
3. Capacity Building and Training	
3.1 Define training needs and identify representatives to undertake training	- Trainees are identified (per organisation, training course)
3.2 Undertake UNITAR training courses	- Number of people (per organisation) enlisted in UNITAR trainings - Number of people (per organisation) finalising the courses successfully - Number of drop-offs
3.3 The 'trained trainers' deliver the training in their organisations	- Number of training courses offered by Ivorian trainers - Number of people (per stakeholder) enlisted in domestic trainings - Number of people (per stakeholder) finalising the courses successfully - Number of drop-offs
3.4 Training and capacity building by ECHA, the Commission, ICCA/Cefic and other institutions	- Number of attendees to webinars/site visits - Number of companies participating in trainings

Table 3-8: Action roadmap and monitoring indicators	
Action	**Suggested indicators**
4. Raise awareness	
4.1 Develop and implement a communication strategy	- Communication strategy completed - Resources allocated to different communication initiatives - Number of information days organised - Number of participants to communication events - Information webpages established
5. Enforcement and compliance	
5.1 Develop an enforcement strategy	- Enforcement strategy completed
5.2 Implement the enforcement strategy	- Number of inspections per intervention point (manufacturers, importers, transport and logistics providers, distributors, retailers, industrial users, professional users) - Number of non-compliances - Number of follow-up activities
6. International collaboration	
6.1 Exchange information with the other three beneficiaries of the four-year pilot projects	- Event in Côte d'Ivoire is successfully organised and implemented - Successful participation of the Ivorian delegation to the other three events
6.2 Exchange information with regional partners	- Regional network is established
7. Monitoring, evaluation and reporting	
7.1 Establish a monitoring, evaluation and reporting system	- The monitoring, evaluation and reporting system is established

Table 3-9 summarises action owners, required resources and time targets for the actions in this roadmap key element.

Table 3-9: **GHS key element 7: Monitoring, evaluation and reporting**										
Action	**Action owner and support**							**Required resources**		
7.1 Establish a monitoring, evaluation and reporting system	The GHS Implementation Committee, with support from the Project Steering Board							0.5 FTE		
Target	**2024 Q1**	**2024 Q2**	**2024 Q3**	**2024 Q4**	**2025 Q1**	**2025 Q2**	**2025 Q3**	**2025 Q4**	**2026 Q1**	**2026 Q2**
Action 7.1		X								

3.9 Conclusions

This roadmap provides a strategic framework for integrating the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) within the national regulatory context, addressing key challenges and setting a path for effective implementation.

Key conclusions of the roadmap include:

1. **Legislative Framework Development**: The roadmap identifies the need for a robust legislative framework to align with GHS standards. The proposed legislation should address gaps in the current framework, focusing on the classification and labelling of chemical products.

2. **Sustainable Financing**: A major focus of the roadmap is the establishment of a sustainable financing system for chemical management. This includes diversifying funding sources beyond

the state budget and external grants, potentially incorporating fees from industry stakeholders and other revenue-generating mechanisms.

3. **Capacity Building and Training**: The roadmap underscores the importance of comprehensive training and capacity building, recommending various training initiatives by UNITAR and other international bodies. This is crucial for equipping Ivorian stakeholders with the knowledge and skills necessary for GHS compliance.

4. **Awareness Raising**: The roadmap highlights the need for a widespread awareness campaign. This involves educating stakeholders across various sectors about the GHS and its implications for chemical safety and environmental protection.

5. **Enforcement and Compliance Strategy**: Developing and implementing an enforcement strategy is crucial. This includes setting up comprehensive inspection systems to ensure adherence to GHS standards and effective hazard communication.

6. **International Collaboration**: The roadmap encourages international collaboration, suggesting the establishment of networks with regional authorities and participation in international forums for knowledge exchange and support.

7. **Monitoring, Evaluation, and Reporting**: Establishing a system for monitoring, evaluation, and reporting is recommended to assess the effectiveness of the implementation process and make necessary adjustments.

In conclusion, the roadmap for Côte d'Ivoire is a comprehensive and strategic guide that addresses the current gaps in chemical management and charts a course for the country's alignment with global chemical safety standards. Its successful implementation is key to safeguarding public health, protecting the environment, and fulfilling international chemical safety obligations.

Table 3-10 shows the Gantt chart and the suggested allocation of financial resources from the pilot project.

Table 3-10: GHS National Implementation Roadmap – Côte d'Ivoire											
Actions	**Financial resources required**	**Timeline**									
		2024 Q1	**2024 Q2**	**2024 Q3**	**2024 Q4**	**2025 Q1**	**2025 Q2**	**2025 Q3**	**2025 Q4**	**2026 Q1**	**2026 Q2**
1. Preparatory steps											
1.1 Establish the GHS Implementation Committee		X									
1.1 Organise a national GHS workshop	~€5,000	X									
2. GHS-based regulatory framework and implementing activities											
2.1 Develop the legislation on classification and labelling of chemicals									X		
2.2 Develop a guidance document									X		
2.3 Propose substances with harmonised classification and labelling									X		
2.4 Apply to become observers in the United Nations Sub-Committee of Experts on the GHS, and the United Nations Subcommittee of Experts on the Transport of Dangerous Goods									X		
2.5 Establish a sustainable financing system for chemicals control									X		
3. Capacity Building and Training											
3.1 Define training needs and identify representatives to undertake training		X									
3.2 Undertake UNITAR training courses	~€30,000										
3.3 The 'trained trainers' deliver the training in their organisations	~€10,000										
3.4 Training and capacity building by ECHA, the Commission, ICCA/Cefic and other institutions	~€10,000										
4. Raise awareness											
4.1 Develop and implement a communication strategy	~€20,000										
5. Enforcement and compliance											
5.1 Develop an enforcement strategy											
5.2 Implement the enforcement strategy											
6. International collaboration											
6.1 Exchange information with the other three beneficiaries of the four-year pilot projects					X		X		X		X
6.2 Exchange information with regional partners											
7. Monitoring, evaluation and reporting											
7.1 Establish a monitoring, evaluation and reporting system			X								

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RPA Europe
Via F. Turati 8, 20121 Milan (Italy)
www.rpa-europe.eu