



Hazardous Substance Rules and Cleaner Production Guidelines

Meeting at EPD

Promoting Sustainability in the Textile and Garment Industry in Asia (FABRIC)



Deutsche Gesellschaft
für Internationale
Zusammenarbeit (GIZ) GmbH

Focus Areas

- The focus Areas is Textile and Garment Sector
- Chemicals are key ingredients to Textile Processing

- On the European market, there are about 7,000-8,000 textile auxiliaries (TAs) with 400-600 active agents available
- Globally more than 10,000 Chemicals available
- Around 4,500 commercial colorant
 - Around 50% belong to Azo class (Double binding nitrogen group)

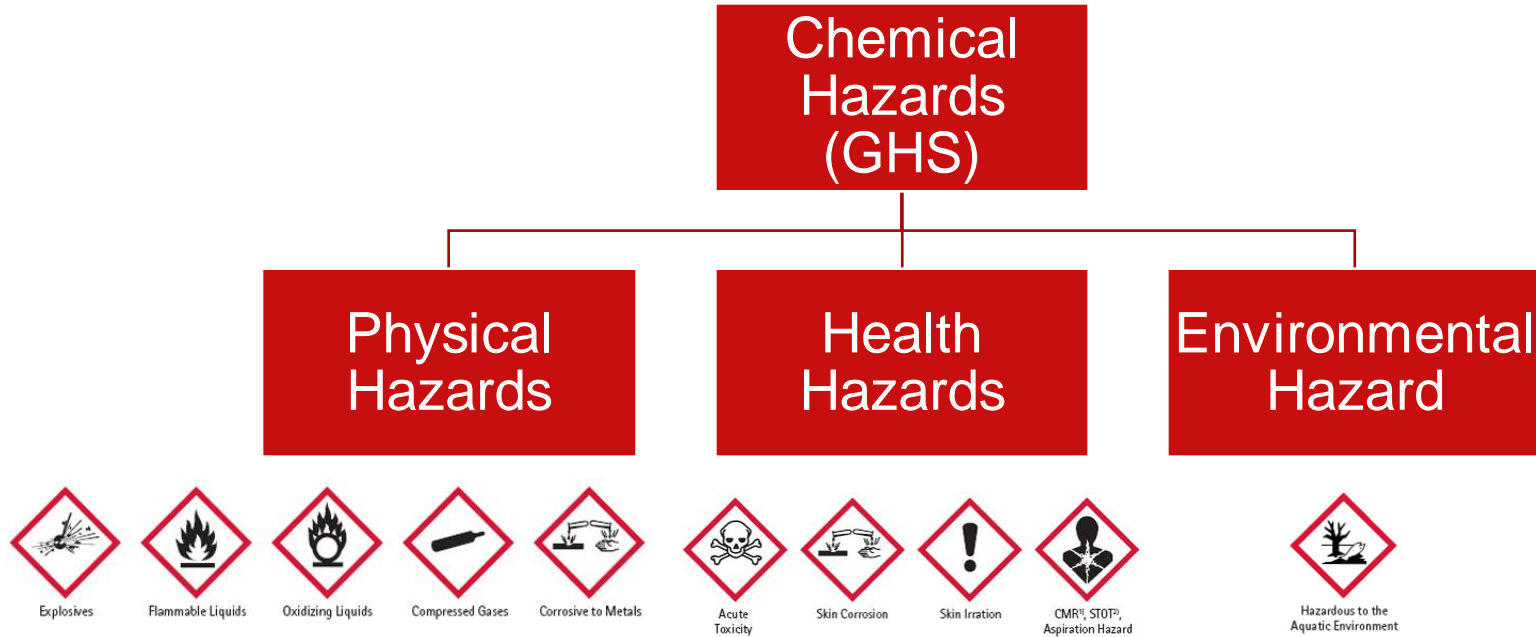
Punjab Hazardous Substance Rules 2020

Rule #	Review Area	Recommendations
2	Eliminated Chemicals as per Stockholm Conventions	“Eliminated Chemicals” Update elimination of chemicals list referred in Schedule 1 part B in the Rules. List of 08 chemicals is mentioned in HS rules needs to be updated with listed in the Stockholm Convention for elimination and restriction and unintentional production.

Punjab Hazardous Substance Rules 2020

Rule #	Review Area	Recommendations
2, 3	Review of definition of hazardous substances, Classification for hazardous substance,	Review the list of hazardous chemicals mentioned as Schedule 1 Part A

Hazards Associated with Chemicals



Hazards Associated with Chemicals

Physical Hazards

- Pyrophoric liquids
- Pyrophoric solids
- Self-heating substances
- Oxidizing liquids
- Oxidizing solids
- Organic peroxides
- Corrosive to metals
- Explosives
- Flammable gases
- Flammable aerosols
- Oxidizing gases
- Gases under pressure
- Flammable liquids
- Flammable solids
- Self-reactive substances
- Substances which, in contact with water emit flammable gases

Health Hazards

- Acute toxicity
- Skin corrosion/Irritation
- Serious eye damage/Eye irritation
- Respiratory or Skin sensitization
- Germ cell mutagenicity
- Carcinogenicity
- Reproductive toxicology
- Target organ systemic toxicity - Single exposure
- Target organ systemic toxicity – Repeated exposure
- Aspiration toxicity

Environmental Hazards

- Hazardous to the Aquatic environment
- Acute aquatic toxicity
- Chronic aquatic toxicity
- Bioaccumulation potential
- Rapid degradability

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Rule #	Review Area	Recommendations
5 (2) b	Environmental Impact Assessment Report of Project or Industrial Activity	In addition to name, list and quantity of hazardous substances, also useful to indicate type of hazards associated with the substance, ideally together with classification in line with GHS

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Rule #	Review Area	Recommendations
10 (a)	General Safety Precautions	...follow the instructions in the respective safety data sheet (SDS) and safety instructions printed.
10 (b)	General Safety Precautions	MSDS needs to be replaced with SDS and standard format can be added as Schedule.
10 (d)	General Safety Precautions	No clear what “premises” refers to, since no definition is given in section 2 – it could be made clearer by saying “....not be allowed to enter any area/location on the site where hazardous substances are stored, used, handled, treated...”

Punjab Hazardous Substance Rules 2020

Rule #	Review Area	Recommendations
11 (g)	Safety Precautions for Workers	Suggested rewording: Firefighting, emergency and safety equipment (emergency kits, PPE, first aid box, eye wash facility, washing area and suitable/specific fire extinguishers, emergency showers etc.) shall be made available in line with recommendation of respective safety data sheet and respective national regulations as well as frequently checked/ drilled and maintained.
11 (h)	Safety Precautions for Workers	First aid medical facility equipped with required antidotes (such as stipulated in the safety data sheets) shall be available in the premises, supervised by trained staff

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Rule #	Review Area	Recommendations
11 (i)	Safety Precautions for Workers	Medical checkup of all workers shall be carried out at the time of employment and at least once a year thereafter. This shall in particular include all those workers who are handling hazardous substances and/or required to wear personal protective equipment.
11 (k)	Safety Precautions for Workers	Mock drills may be arranged biannually for workers to cope with emergency situations, in particular those involving hazardous chemicals.
11 (l)	To be considered as additional point	For workers required to use respiratory protective equipment, records of initial as well as annual refresher training on proper use of respiratory protective equipment shall be maintained.

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Rule #	Review Area	Recommendations
12	Packing and labelling	The requirements will be updated as per GHS and pictograms can be added in the document as schedule
13	Conditions for Premises (User Factory)	Review of Schedule IV (Hazards and Conditions for Premises) Guideline for GHS labelling
14	Treatment and Disposal	Recommended and best practices can be shared as list in schedule

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Rule #	Review Area	Recommendations
15	Safety Plan, add (4)	A timebound plan for the possible substitution of hazardous substances shall be provided by the applicant which shall be reviewed by the competent authority of license renewal as well as part of on-site inspections.
17	Transport of Hazardous Substances	Review of Schedule VIII as per UNECE
18	Reporting of Accidents	Review of Schedule V (Reporting of accidents) Best practice for accident reporting can be shared as schedule.

Scope of Work

- Consultation with the EPD and Preparation for TOR's for Further Improvement
- Consultation with Authorities in Bangladesh In context of recently developed National Chemical Management Guidelines (NCMG)
- Preparation of Draft by the international expert of the consortium
- Submission of Draft to EPD for Review
 - Consultation with local stakeholders
- Input from EPD will be incorporated to finalize the draft
- The expected Timeline is September to December 2021

Cleaner Production Guidelines

Cleaner Production Guidelines for Textile Wet Processing

- Textile Wet Processing is one of the most polluting sector and number of facilities are greater than any other sector in Punjab
- Cost Effective approach when compared with End of Pipe Interventions
 - End of pipe solutions are interim arrangements, costly and have their own footprint
 - continuous application of preventive environmental strategies to processes, products and services in order to increase efficiency and reduce risks to humans and the environment.
- The guideline may contribute to SDG 6, 9 and 12, 13

Cleaner Production Guidelines for Textile Wet Processing

- It can be a tool for engaging the local industry into a framework for environmental improvement
- The guideline may lead to policy making in the province
 - Viet Nam is successfully following the cleaner production policy for last 10 years
 - Sindh is also working on Cleaner Production Policy
- The guideline may contribute to SDG 6, 9 and 12, 13

Scope of Work

- Consultation with the EPD and Preparation for TOR's for drafting a guideline
- Consultation with Authorities in the Region
- Preparation of Draft by the international expert of the consortium
- Submission of Draft to EPD for Review
 - Consultation with local stakeholders
- Inputs from EPD will be incorporated to finalize the draft
- The expected Timeline is October to January 2022

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