

4 IMPLEMENTATION PROGRAMME

The National Implementation Strategy has been developed by addressing the following strategic initiatives, i.e. legislation, institutional, training, awareness raising, and technical infrastructure. Each initiative has been developed to a level of specific goals, objectives and activities.

4.1 Legislation

Legislation which facilitates and enables the effective implementation of the GHS in South Africa will be required if the system is to be enforceable. The strategic approach to legislation is based on Option 5 set out in Table 3.2.

4.1.1 Goal

To ensure that the South African regulatory system provides a framework for hazard classification and communication management which reflects the requirements of the GHS system throughout the life-cycle of chemicals and which encompasses all the sectors contemplated by the GHS.

4.1.2 Objectives

Objective 1: Amend existing legislation or where no relevant legislation exists, promulgate new legislation to cover all aspects of the GHS.

Objective 2: Develop a mandatory technical standard based on the GHS which will be referenced in all legislation referred to in Objective 1.

4.1.3 Activities

The required activities are set out in Table 4.1 below.

Table 4.1: Activities Required to Incorporate GHS Elements in Legislation

Action	Responsibility	Timeframe	Comments/Constraints
Legislation Objective 1: Amend or promulgate legislation to ensure implementation of GHS			
<p>Amendment of OHS Act to incorporate reference to all elements of the GHS in industrial production and use of chemicals in all sectors</p> <p>Incorporation of relevant GHS elements in consumer policy</p> <p>Amendment of Hazardous Substances Act to incorporate reference to all elements of the GHS within jurisdiction of the Act and to eliminate duplication</p> <p>Incorporate relevant elements of the GHS in revisions of Fertilizers, Fams Feeds, Agricultural Remedies and Stock Remedies Act</p> <p>Amendment of Road Traffic Act to incorporate reference to all elements of the GHS in transport of chemicals</p> <p>Amendment and/or passing of regulations in terms of the Railway Safety Regulator Act</p> <p>Amendment of Minimum Requirements Series to reflect GHS classification system</p> <p>Amendment of Explosives Act to reflect streamlined classification system</p>	<p>DOL</p> <p>the dti (Consumer Regulatory Affairs)</p> <p>DOH</p> <p>NDA</p> <p>NDOT</p> <p>NDOT</p> <p>DWAF/ DEAT</p> <p>SSS</p>	<p>2004 – 2007</p>	<p>Co-ordination between the different authorities will be necessary to ensure that the approach is comprehensive and consistent.</p> <p>Criteria will need to be developed to ensure coordinated implementation of legislation in regard to:</p> <ul style="list-style-type: none"> • implementation of legislated institutional roles and functions to ensure elimination of overlap of jurisdictional mandates; and • co-ordination between inter-governmental forums for disaster management.

4.2 Institutional

Appropriate institutional arrangements will need to be in place to facilitate and enable the effective implementation of the GHS in South Africa. All relevant stakeholder institutions (government, the industrial production sector, the agricultural sector, the transport sector, as well as the consumer sector) need to work together to ensure the successful implementation of the GHS.

4.2.1 Goal

To ensure that all the necessary institutional arrangements are in place to facilitate and enable the effective implementation of the GHS in South Africa by 2008.

4.2.2 Objectives

- Objective 1:** Harmonised development and implementation of the SABS GHS Standard by the relevant government departments, in co-operation with labour, business and consumer organisations, using the SABS Technical Committee.
- Objective 2:** Compliance and enforcement capacity within the regulatory authorities established through adequate budget allocations; compliance monitoring; enforcement of legislation; and the development of support mechanisms.
- Objective 3:** Existing private sector initiatives utilised to promote industry compliance with GHS legislation.
- Objective 4:** Interaction with international institutions strengthened for the further development and implementation of the GHS.
- Objective 5:** Harmonised approach to the implementation of the GHS with SADC and African Union trading partners.
- Objective 6:** On-going training and awareness raising within relevant government and non-government organisations ensured.
- Objective 7:** Relevant institutions have access to the required technical infrastructure to implement the GHS.

4.2.3 Activities

The required activities are set out in Table 4.2 below.

Table 4.2: Activities Required to Incorporate GHS Elements in Institutional Arrangements

Action	Responsibility	Timeframe	Comments/Constraints
Institutional Objective 1: Harmonised development and implementation of the GHS			
Strengthen government representation on the SABS Technical Committee for the GHS	DOL, the dti (STANSA), DOH, NDA, NDOT, DWAF, DEAT, SSS	2004	All relevant government departments need to be represented on the SABS Technical Committee to assist and make input into the development of the SABS Standard on GHS.
Strengthen non-government representation on the SABS Technical Committee for the GHS	Labour, Business and consumer organisations	2004	All relevant non-government organisations need to be represented on the SABS Technical Committee to assist and make input into the development of the SABS Standard on GHS.
Develop SABS Standard for the implementation of the GHS Standard	SABS Technical Committee	2004 – 2006	All relevant organisation need to make input into the development of the SABS GHS Standard.
Harmonised Implementation of the SABS Standard	DOL, the dti (STANSA), DOH, NDA, NDOT, DWAF, DEAT, SSS and Business	2006+	All relevant organisation work toward the harmonised implementation of the SABS GHS Standard. Effective implementation date to be harmonised between the Departments.

Action	Responsibility	Timeframe	Comments/Constraints
Institutional Objective 2: Regulatory authorities' compliance and enforcement of capacity established			
Undertake capacity needs assessment for compliance and enforcement requirements	DOL, the dti (Consumer Regulatory Affairs), DOH, NDA, NDOT, DWAF, DEAT, SSS	2005	All relevant government departments to undertake capacity needs assessment for meeting their requirement to ensure compliance and enforcement as part of their legislative amendments.
Develop programme for compliance monitoring and enforcement of the SABS GHS Standard	DOL, the dti (Consumer Regulatory Affairs), DOH, NDA, NDOT, DWAF, DEAT, SSS	2006	Develop programmes for compliance monitoring and enforcement of the SABS GHS Standard. Ensure linkage to information management system (see section 4.6 on infrastructure development)
Compile and motivate appropriate budget allocation for implementation of the programme	DOL, the dti (Consumer Regulatory Affairs), DOH, NDA, NDOT, DWAF, DEAT, SSS	2007+	Make appropriate budget allocation for implementation of the programme for compliance monitoring and enforcement as part of the legislative process.
On-going compliance monitoring and enforcement of legislation	DOL, the dti (Consumer Regulatory Affairs), DOH, NDA, NDOT, DWAF, DEAT, SSS	2007+	Ensure adequate resources (human and financial) through ongoing training and capacity development (see sections 4.3 and 4.4) and adequate budget allocations to support activity
Institutional Objective 3: Existing private sector initiatives utilise to promote industry compliance with GHS legislation.			
Develop and refine programme to support industry in implementing GHS	the dti (Consumer Regulatory Affairs)	2005 – 2006	the dti (Consumer Regulatory Affairs) to further develop and refine its programme to support industry, from large to small companies, to assist them in complying with the SABS GHS Standard
Implement programme	the dti (Consumer Regulatory Affairs)	2007+	Ensure adequate budget allocations to support activity

Action	Responsibility	Timeframe	Comments/Constraints
Institutional Objective 4: Strengthened Interaction with International Institutions			
Develop South African position regarding the Implementation of the GHS	SABS GHS Committee	2004	<p>The relevant government departments, NGOs and the private sector need to actively support the relevant national department to more effectively fulfil its mandate in representing South Africa on the United Nations GHS Expert Committee.</p> <p>Through the SABS GHS Committee develop South African position regarding the Implementation of the GHS worldwide</p>
Present and lobby South African position in UN Expert Committee on GHS	SABS GHS Committee Representative(s)	2004 – 2006	SA representatives to actively lobby South African position in UN Expert Committee on GHS to influence the refinement and finalisation of the GHS
Provide on-going input from South Africa to the International GHS related processes	South African delegation to the GHS meetings	2004+	<p>The relevant government departments, through the SABS Technical Committee, need to consult with and take due cognisance of the requirements of the relevant international institutions (e.g. GEF, UNITAR, UNEP).</p> <p>Opportunities need to be pursued to obtain international funding for the implementation of the GHS in South Africa</p>

Action	Responsibility	Timeframe	Comments/Constraints
Institutional Objective 5: Harmonised approach to the implementation of the GHS with regional and African Union trading partners			
Develop position on GHS consistent with requirements of major trading partners	SABS GHS Committee	2004	Through the SABS GHS Committee, develop a regional, African and international position regarding the Implementation of the GHS taking due cognisance of the requirements of South Africa's major trading partners, i.e. SADC, NEPAD, EU and the MERCUSOR countries
Ensure harmonisation with regional and international trading	the dti (Import and Export), with support from Industry, Agriculture, Transport, Emergency Responders	2004+	Work closely with SADC, NEPAD, EU and the MERCUSOR countries to ensure harmonisation with regional and international trading partners
Institutional Objective 6: On-going training & awareness raising within relevant government & non-government organisations ensured			
Provide on-going training and awareness raising within relevant government and non-government organisations	-	-	See sections 4.3 and 4.4
Institutional Objective 7: Relevant institutions have access to required technical infrastructure to implement the GHS			
Provide access to the required technical infrastructure to implement the GHS	-	-	See section 4.5

4.3 Training

Effective training is essential to the success of an effective GHS. The SETA training system provides a foundation within which the necessary training programmes can be developed and implemented. The important role of other stakeholders, including the trade unions, NGOs, industry organisations and poison centres, in undertaking training is also recognised.

4.3.1 Goal

The development and implementation of appropriate training programmes for each target sector that is commensurate with the nature of the work or exposure.

4.3.2 Objectives

- Objective 1:** Ensure that maximum use is made of existing training infrastructure.
- Objective 2:** Develop and implement relevant training courses to cover all elements of GHS for all relevant role players along the value chain.
- Objective 3:** Ensure that training in GHS is harmonised across all sectors.
- Objective 4:** Ensure that the special training challenges of SMMEs and rural organisations are addressed.

4.3.3 Activities

Table 4.3 sets out the activities to achieve the objectives specified for training.

Table 4.3: Activities Required to Incorporate GHS Elements in Training

Action	Responsibility	Timeframe	Comments/Constraints
Training Objective 1: Ensure that maximum use is made of existing training infrastructure			
Accreditation of GHS Training Unit Standard	SAQA	2005	Report compiled by CHIETA on the SHE study tour to be taken into account.
Develop Performance Criteria for GHS training	SETAs	2004	Part of SETAs' functions
Identify and accredit additional service providers to implement the GHS training standard	CHIETA, TETA, LGWSETA, PAETA, SETASA, Services SETA, W&RSETA	2004 – 2006	
Accredit training programmes implemented by manufacturers along the product life-cycle	CAIA, AVCASA, Industry sector	2004 – 2008	
Training Objective 2: Implementation of training courses that cover all elements of the GHS for all relevant role-players along the value chain			
Determine the GHS elements relevant to each role player in the value chain	DOL, CAIA, Labour etc.	2004	
Identify the jobs in the life-cycle where GHS training will be required	Chemical industry, downstream users and service sectors	2004	CAIA Product Stewardship Strategy can be used as a basis for this work NQF will be used to determine what training modules need to be developed
Identify prior learning requirements to fulfil requirements of GHS unit standard	CHIETA, TETA, LGWSETA, PAETA, SETASA, Services SETA, PSETA, W&RSETA	2004	Part of SETAs' functions

Action	Responsibility	Timeframe	Comments/Constraints
Develop GHS Unit Standard for incorporation into the SHE qualification CHIETA to take the lead in developing the unit standard	CAIA, CHIETA, SAQA, Labour etc.	2004	CHIETA has established a Working Group to develop a SHE unit standard Work to be funded by CHIETA
Revise the training programmes implemented by existing service providers in the SHE field to include GHS	CHIETA, service providers	2004 – 2005	
Ensure that a variety of training methods are accredited	CHIETA, TETA, LGWSETA, PAETA, SETASA, Services SETA, W&RSETA, Service providers	2004 – 2005	Distance learning, train the trainer, peer training, group training, incorporation in formal tertiary qualifications
Monitoring and auditing of implementation in all objectives	CHIETA, TETA, LGWSETA, PAETA, SETASA, Services SETA, W&RSETA	2005 – 2008	Function of SETAs
Mobilise a range of service providers for accreditation	CHIETA, TETA, LGWSETA, PAETA, SETASA, Services SETA, W&RSETA	2004 – 2005	
Training Objective 3: Ensure harmonisation of GHS training across all sectors			
Incorporate GHS unit standard into all relevant training courses	CHIETA, TETA, LGWSETA, PAETA, SETASA, Services SETA, W&RSETA	2004 – 2008	Supported by competent authorities, Industry, Agriculture, Transport, Emergency Responders and CBOs, Labour
Establish links amongst all SETAs for all sectors involved in GHS implementation	CHIETA	2004	

Action	Responsibility	Timeframe	Comments/Constraints
Training Objective 4: Ensure that the special training challenges of SMMEs and rural organisations are addressed.			
Establish and implement special mechanisms to extend training to SMMEs and rural areas	CHIETA, TETA, LGWSETA, PAETA, SETASA, Services SETA, W&RSETA, Service providers	2004 – 2005	Financial and resource constraints identified in the Situation Analysis
Develop performance criteria to monitor the effectiveness of SMME and rural area training	CHIETA, TETA, LGWSETA, PAETA, SETASA, Services SETA	2005	

4.4 Awareness raising

Awareness raising programmes are needed to raise awareness of the GHS and the hazard information conveyed. Effective implementation will require a range of service providers and the co-operation and co-ordinated approach of all stakeholders.

4.4.1 Goal

A comprehensive awareness raising programme developed and implemented that addresses the needs of the different target audiences along the value chain and ensures that the information conveyed on the MSDS and/or label is accessible to the user.

4.4.2 Objectives

- Objective 1:** Update existing awareness programmes to include relevant areas of the GHS.
- Objective 2:** Implement awareness programme along the value chain.
- Objective 3:** Strengthen the capacity of organisations currently implementing programmes in the consumer sector to undertake awareness raising.
- Objective 4:** Increase the number of organisations that can implement awareness raising.

4.4.3 Activities

Table 4.4 sets out the activities to achieve the objectives specified for awareness raising.

Table 4.4: Activities Required to Incorporate GHS Elements in Awareness Raising

Action	Responsibility	Timeframe	Comments/Constraints
Awareness Raising Objective 1: Update existing awareness programmes to include relevant areas of the GHS			
Develop GHS awareness programmes that are appropriate for each target audience	Awareness raising organisations, CAIA, AVCASA, the dti (Consumer Regulatory Affairs)	2004 – 2005	Co-ordinate with training element to ascertain the GHS elements relevant to each role player in the value chain
Develop a communications strategy that addresses the value chain	Awareness raising organisations, CAIA, AVCASA, the dti (Consumer Regulatory Affairs)	2004 – 2005	Range of communications activities implemented along the value chain that addresses diverse nature of sector
Revise the programmes implemented by existing service providers to include GHS	Awareness raising organisations, CAIA, AVCASA, the dti (Consumer Regulatory Affairs)	2004 – 2005	
Develop and incorporate GHS module into educational curricula	DOE, DOL, DOH	2007 – 2008	Incorporation into primary and secondary curricula
Awareness Raising Objective 2: Implement awareness programme along the value chain			
Establish links between awareness raising organisations in each sector and identify feasible cross-sectoral co-operation	Awareness raising organisations,	2004	
Implement the communications strategy through existing system of service providers along value chain	Awareness raising organisations,	2004 – 2008	
Develop performance criteria to evaluate effectiveness of programmes	Awareness raising organisations, CAIA, AVCASA	2004	
Monitor effectiveness of the programmes and revise strategy where appropriate	Awareness raising organisations,	2004 – 2008	

Action	Responsibility	Timeframe	Comments/Constraints
Awareness Raising Objective 3: Strengthen the capacity of organisations currently in the consumer sector to undertake awareness raising			
Establish additional capacity needs for existing service providers to extend programmes for GHS programmes	CAIA, AVCASA, Awareness raising organisations	2004	
Develop a strategy to address capacity needs	the dti (Consumer Regulatory Affairs), CAIA, AVCASA	2004	
Implement strategy	the dti (Consumer Regulatory Affairs), Awareness raising organisations	2005 – 2008	
Awareness Raising Objective 4: Increase the number of organisations that can implement awareness raising			
Establish requirements for awareness raising organisations in each sector	DOH, DOL, NDA, NDOT, the dti (Consumer Regulatory Affairs), AVCASA, CAIA	2004 – 2005	
Identify appropriate organisations that are working within the sectors that could implement GHS awareness raising	DOH, DOL, NDA, NDOT, the dti (Consumer Regulatory Affairs), AVCASA, CAIA	2004 – 2006	

4.5 Technical infrastructure

Implementation of the GHS will require effective supporting technical infrastructure. However, existing infrastructure can be extended and upgraded to meet the requirements of the GHS.

4.5.1 Goal

The strengthening of existing technical infrastructure in South Africa to support the effective and efficient implementation of the GHS in South Africa.

4.5.2 Objectives

- Objective 1:** Promote the accreditation of testing facilities for all hazard criteria through the SANAS accreditation system
- Objective 2:** Conclude international multilateral agreements to ensure the international acceptance of results from accredited facilities.
- Objective 3:** Establish appropriate infrastructure to effectively respond to enquiries in respect of poisoning incidents involving chemicals and the appropriate emergency response. Extend the scope to respond to all incidents involving chemicals and enquiries regarding chronic impacts of chemicals.
- Objective 4:** Establish appropriate information management systems both for GHS implementation and compliance monitoring.
- Objective 5:** Establish appropriate mechanisms to assist stakeholders to access relevant hazard communication information.

4.5.3 Activities

Table 4.5 sets out the activities to achieve the objectives specified for Technical Infrastructure.

Table 4.5: Activities Required to Incorporate GHS Elements in Technical Infrastructure

Action	Responsibility	Timeframe	Comments/Constraints
Technical Infrastructure Objective 1: Promote the accreditation of testing facilities for all hazard criteria through the SANAS accreditation system			
Ensure test methods to cover all classification testing required are available	SANAS, Industry, Agriculture, CAIA, AVCASA, the dti (STANSA), testing facilities	2004	
Accredit laboratories that have the capacity to undertake GHS testing	SANAS	2005 – 2008	
Update SANAS training programmes to include GHS testing and implement training	SANAS	2005 – 2008	
Extend and maintain SANAS database to reflect accredited facilities and their capabilities for GHS testing	SANAS	2005 – 2008	
Raise awareness of accreditation system and the facilities accredited to undertake GHS testing	DOL, NDA, SANAS, CAIA, AVCASA, the dti (STANSA)	2004 – 2008	
Technical Infrastructure Objective 2: Conclude international multilateral agreements to ensure the international acceptance of results from accredited facilities			
Conclude international multilateral agreements with other accreditation bodies for GHS testing	the dti (Import & Export)	2004 – 2005	

Action	Responsibility	Timeframe	Comments/Constraints
Promote the participation of SADC countries in the development of the GHS test methods and accreditation and a regional approach to international acceptance	SADC Co-operation in Accreditation (SADCA)	2004 – 2006	
Technical Infrastructure Objective 3: Establish appropriate infrastructure to effectively respond to enquiries in respect of poisoning incidents involving chemicals and the appropriate emergency response. Extend scope to respond to all incidents involving chemicals and enquires regarding chronic impacts of chemicals.			
Develop a strategy for the upgrading of existing poisons centres or the establishment of one centralised facility to respond to enquiries regarding GHS	DOH, Industry	2004 – 2005	
Develop and implement guidelines regarding information requirements to be provided by chemical manufacturers to poison centres and emergency responders	CAIA, AVCASA, DOL, NDA, DOH Industry	2004 – 2005	
Establish and maintain a chemical hazard information database that is accessible by poison centres and emergency responders	Industry	2004 – 2008	
Promote awareness of the poison centres and their role in GHS implementation	Poison centres, CAIA, AVCASA, DOH	2005 – 2008	

Action	Responsibility	Timeframe	Comments/Constraints
Establish reporting requirements by poison centres regarding the number and type of enquiries received in order to monitor GHS implementation	DOH, poison centres	2004 – 2005	
Technical Infrastructure Objective 4: Establish appropriate information management systems both for GHS implementation and compliance monitoring.			
Review current reporting requirements and revise to include relevant GHS information	the dti (Consumer Regulatory Affairs), NDOT, DOH, DOL, NDA, DPLG, CAIA, AVCASA, Labour, Industry, Agriculture	2004 – 2005	
Update and maintain information databases at relevant government departments	the dti (Consumer Regulatory Affairs), NDOT, DOH, DOL, NDA, DPLG	2004 – 2008	
Harmonise and co-ordinate information collection and use between relevant government departments	the dti (Consumer Regulatory Affairs), NDOT, DOH, DOL, NDA, DPLG	2004 – 2008	
Strengthen the capacity at the relevant government departments in order to implement GHS compliance monitoring	the dti (Consumer Regulatory Affairs), NDOT, DOH, DOL, NDA	2004 – 2006	
Develop strategy to assist SMMEs to access relevant chemical information	the dti (Consumer Regulatory Affairs), DOL, CAIA, AVCASA	2004 – 2005	
Objective 5: Establish appropriate mechanisms to assist stakeholders to access relevant hazard communication information			
Develop strategy to facilitate access to relevant chemical information	the dti (Consumer Regulatory Affairs), DOL, CAIA, AVCASA	2004 – 2005	

4.6 Resources

The implementation of the National Implementation Strategy will require a range of resources. This section identifies the required resources and attempts a qualitative description of the resource requirements.

4.6.1 Introduction

Developed countries treat the implementation of the GHS as an extension of their chemical management systems.² The additional cost involved is thus incremental. The Gap Analysis (Phase 2) revealed that almost all elements of the infrastructure for the sound management of chemicals are in place in South Africa. However, as a developing country South Africa's chemical management system is not as coherent, well developed, and resourced as in developed countries. There are serious shortfalls in the enforcement of compliance, emergency responses, training and awareness that tend to compromise the functioning of the South African system. South Africa thus needs a change to accelerate its chemicals management programmes for it to become successful in the implementation and maintenance of the GHS. Furthermore, in some areas once-off costs need to be incurred in the course of the implementation phase, while recurrent costs may stabilise once the system is running effectively. However, this would be at a higher level than at present, not only because of the additional recurrent costs that the administration of the GHS would require, but also because of sufficient resources being spent to bridge shortcomings in existing activities. However, hazard classification and communication does not carry high costs and adoption of the GHS by South Africa would also imply incremental rather than considerable costs.

4.6.2 Broad Resource Estimates

Lack of appropriate quantitative data precludes a substantive quantitative assessment of the resources that are required to implement the GHS in South Africa. However, a purely qualitative evaluation of costs may also not suffice to explain resource requirements as graphically as required. Consequently, resource requirements were broadly evaluated to implement the activities that were mentioned in Tables 4.1 to 4.5 above.

Possible sources of financing and assistance for the implementation of the GHS were identified in Phase 2 of the study and include budgetary provisions, donor funds, funds under the control of the SETAs for training, and the WSSD-Partnership whose objective is to build capacity in developing countries to implement the GHS. In Table 4.6, although highly tentative, these sources of resources are related to the resource requirements.

The broad estimates of resource requirements and of the possible sources from where they could be defrayed could prove to be useful in:

- that the resource requirements to achieve each of the objectives receive due consideration, is refined further and provided for to implement the GHS;
- the items that are financially the most important in the implementation of the GHS are identified; and
- that the differentiation between cost items could reveal possible sources for their financing.

² The Australian Chemicals and Plastics Industry Action Agenda: Response by the Ministry of Industry, Tourism & Resources to "Underpinning Australia's Industrial Growth" October 2002.

However, it should be noted that these figures are only broad estimates that give an extremely tentative indication of cost, and should be subjected to rigorous refinement by the appropriate implementation authority.

4.6.3 Resource requirements

In Table 4.6 differences are shown between resources that can be sourced in-house from existing institutions and those that need to be bought in, while reference is made to instances where the implementation of the GHS and/or improvement in overall chemical management, imply increased post implementation resource use. Reference is made as to possible sources from which resources could possibly be obtained or augmented.

The broad estimate of resource requirements indicates that:

- Twenty five person years from among present staffing in Government Departments, Business, Labour and NGOs are needed over the period 2004 to 2008 to implement the GHS. The staff would be needed to prepare legislation, strengthen the institutional capacity, technical infrastructure and training capacity to deal with the GHS.
- An amount of R25 million to assist companies to comply with the GHS could be involved in terms of existing programmes of **the dti** (Competitiveness Fund). The most pressing need is expected to be compliance with the testing requirements of the GHS. Cost savings may arise from accreditation of laboratories with SANAS that offer the opportunity to avoid the use of the expensive facilities that are found in the developed countries.
- The extra funds that are required for the implementation of the GHS could be R60 million. The major portion, i.e. R38 million, is for training and are expected to be defrayed from existing resources of the SETAs.
- The remaining expenditure of R22 million is spread over four years and primarily would serve to strengthen the institutional capacity and technical infrastructure among Government, Business and Labour, relevant to the implementation of the GHS.
- This would also translate into higher recurrent costs (R4 million per annum) in sustaining the GHS in terms of institutional and technical capacities, especially compliance and law enforcement. This would also require additions to permanent staff.

Table 4.6 Resource Requirements for the Implementation of the GHS and Possible Sources of Resources

Activity	In house (no extra cost re GHS)	Extra for implementing of GHS	Recurrent costs	Donor assistance
Legislative	Three person years	-	-	-
Institutional	Eight person years. R25 million the dti assistance to companies to comply	R6 million.	R1 million plus two person years	WSSD- Partnership assistance
Total Training	Seven person years	R38 million of which R35 million ex-SETAs Three person months	Undertaking of training is ongoing	Assistance from WSSD- Partnership
Total Awareness Raising	1 person years	R5 million	R1 million	R2 million
Technical Infrastructure	Four person years	R5 million	R2 million and four person months per year	.
Establish interactive data base	Two person years	R3 million	R1.5 million	R3 million
TOTAL	Twenty five person years. R25 million ex existing the dti-programmes	R60 million	R5.5 million & six person years	R8 million Plus in kind assistance from WSSD- Partnership

- Awareness raising programmes should be more prominent than before and could require R5 million during the implementation phase and a further R1 million per annum thereafter.
- Compliance with the GHS requirements will enable leverage of other donor funds for discrete and once-off elements for the implementation of the GHS. For example, donors could be approached for assisting with the legal, capacity building and awareness raising activities.
- Since one of the main objectives of the WSSD GHS Partnership by UNITAR, ILO and OECD, launched at the World Summit on Sustainable Development in Johannesburg during 2002, was to mobilise support and catalyse partnerships in assisting with implementation of the GHS, it is anticipated that the WSSD Partnership will become the vehicle for donor assistance for implementation of the GHS. The Partnership is expected to assist especially in respect of capacity building, awareness raising and training. The lead authority should ensure that maximum benefits are derived from the WSSD Partnership for the benefit of the implementation process.

The above indications serve as a broad indication of resource requirements. A rigorous analysis of requirements should be undertaken by the lead authority(ies) at the start of the implementation phase.

4.7 Timeframe and Schedule

The National Implementation Strategy timeframe is 2004 to 2008. Prioritised activities and a first estimate of timeframes and schedules are indicated in Tables 4.1 to 4.5 above.