

# The Globally Harmonized System of Classification and Labelling of Chemicals (GHS)

OPPTS GHS Implementation Planning  
Working Group



Pesticide Program Dialogue Committee  
May 25, 2004

# What are the implications of GHS for pesticides?

- Implementation would affect all pesticide labels
- Every pesticide user and handler will need to understand the new labels

## Today's goal:

Preview plans, preliminary discussion of initial recommendations

Expect more formal request for comment in coming weeks

# What is the GHS?

- A common and coherent approach to defining and classifying hazards, and communicating information on labels and safety data sheets.
- Target audiences include workers, consumers, transport workers, and emergency responders.
- Underlying infrastructure for establishment of national, comprehensive chemical safety programs.

## Where we are now:

- UNCED mandate (1992)
- Tripartite negotiations for over a decade (completed in December 2002)
- UN ECOSOC approval July 2003

# Scope of the GHS

- Harmonization of major existing systems for chemicals in transport, in the workplace, pesticides and consumer products—without lowering the level of protection afforded by those systems
- Classification based on intrinsic properties/hazards
- Scope covers all chemicals
- Consistent with U.S. regulatory framework

## GHS Goals

- To promote safer transport, handling and use of chemicals world wide
- To facilitate international trade in chemical products by promoting greater consistency in regulatory requirements
- To reduce need for testing and evaluation
- To assist countries in developing strategies for sound management of chemicals

# What should be harmonized

- Classification criteria for physical hazards, health hazards, and aquatic toxicity, for chemical substances and mixtures
- Certain standardized label elements: hazard pictograms, use of two signal words (danger and warning), and hazard statements for each hazard class and category
- [Product identifiers and precautionary statements]
- Format and contents for Safety Data Sheets

# What does not need to change to be consistent with the GHS

- Supplemental information
- Testing methods and data requirements
- Use of risk-based labeling for chronic effects for consumer products in the consumer use setting
- Scope of hazards covered by national systems (“building block” approach)
- Downstream effects

# To Implement the GHS

- Cover all pesticides alike (some will be unclassified)
- Adopt GHS for all hazard classes for which we now label
- In general, limit changes to those required for GHS consistency

## Hazard Classes on Labeling (“Building blocks”)

Hazard class	GHS	OPP	PMRA*
Acute toxicity (lethality)	Yes	Yes	Yes
Skin corrosion/ Irritation	Yes	Yes	Yes
Serious eye damage/ Irritation	Yes	Yes	Yes
Respiratory or skin sensitization	Yes	Skin only	Skin only
Germ cell mutagenicity	Yes	No	No

\*Source: [http://www.hc-sc.gc.ca/english/about/ghs/sa/pcp\\_table1.html](http://www.hc-sc.gc.ca/english/about/ghs/sa/pcp_table1.html))

## Hazard Classes on Labeling (“Building blocks”)-2

Hazard class	GHS	OPP	PMRA
Carcinogenicity	Yes	No	No
Reproductive toxicity	Yes	No	No
TOST/single Exposure	Yes	Methanol, Others?	No
TOST/ repeat exposure	Yes	No	No
Aquatic toxicity	Yes	Yes -acute category 1 only	No- risk based

# Acute Toxicity

- GHS 5 categories to replace OPP's 4 categories
- Keep the word POISON for Categories 1 and 2 only

# Skin and Eye Irritation/Corrosion

- OPP Category IV for eye irritation: minimal effects clearing within 24 hours
- GHS Category 2B: mildly irritating, effects clearing within 7 days
- Give Registrant option:
  - No classification, or
  - GHS Category 2B label (no symbol, Warning, Causes eye irritation)

# Skin Sensitization

- Revise current hazard statement to be consistent with the GHS

# Environmental/Aquatic Toxicity

- Current rules cover GHS acute toxicity Category 1
- Recommend adopt acute toxicity Categories 1-3
- Adopt GHS label elements, including signal word (not now permitted for environmental)

# Flammability & Physical Hazards

- Recommend adopt all GHS classes and label elements
- Includes test methods for physical hazards
- Adopt GHS signal words (**NEW**)

# Product Identifier

- Current product and chemical names and registration number requirements satisfy GHS provisions
- Ingredient disclosure rules differ for inerts, but GHS provides that CBI rules may override ingredient disclosure provisions

# Supplier Identifier

- Supplier name, address, and EPA establishment number
- Telephone number strongly encouraged – public comment?

# Impact by Division

- Reviewing/registering divisions:
  - All 22,030 labels will be revised
    - RD = 10,804 (16,886)
    - SRRD = 6,082
    - AD = 4,587
    - BPPD = 589
- IRSD: information systems, front-end processing
- FEAD, BEAD: rule-making
- FEAD: planning effort, communications, outreach, WPS

# Directions for Future Work Inside EPA

- Develop label specifications—size and placement of GHS label elements, etc.
- How to implement?
  - FR NOA for initial input
  - Rule making
  - Contractor v. “routine business” model
  - Resources, including link to fee legislation where appropriate, e.g. database and information systems upgrades

## Next Steps - Outside EPA

- Share recommendations with PMRA, stakeholders
- Publish NOA of White Paper
- Interagency/USG wide event?

# General Implementation Expectations

- Voluntary international system—no binding treaty obligations on countries
- Intent is that countries with existing systems will harmonize them to be consistent with the GHS and
- Countries that do not have systems will adopt GHS as their basic system
- To extent that countries adopt GHS into their systems, binding regulatory changes for industry

# Timing

- No international implementation schedule
- IFCS, WSSD goal of 2008; APEC goal of 2006
- Different systems/sectors likely to require different time frames
- Steps to avoid disruption in transition from old to new labels

# Key Issues for Consideration

- Scope of application: limit to changes required for GHS-consistency, cover all pesticides, adopt GHS for hazards we now label
- Options for label submission and review: separate approval process v. “routine business” model
- Effective outreach and education strategies