The Protective Value of GHS

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Purpose of GHS Actions

♦ Provide a common & coherent approach to defining & classifying hazards & communicating hazard information on labels. Benefits of harmonization:

♦ Enhanced protection of human health & the environment.
♦ Promotes sound management of chemicals by promoting uniform treatment across countries,
♦ Trade facilitation by reducing the barriers of complying with multiple inconsistent classification & labeling schemes.

♦ While White Paper solicited comment on potential implementation approaches, some comments questioned or were confused about the Primary GHS goal.
Diversity of Comments on Value

♦ **California Dept. of Pesticide Regulation**: “We support the effort to harmonize & standardize pesticide labels. Progress toward more universal labels & terminology will benefit users, manufacturers, transporters & workers.”

♦ **CropLife America**: “EPA should not burden the American public with a harmonization effort that promises no significant benefits to the U.S.”

♦ **Monsanto**: “Monsanto supports EPA’s efforts to harmonize the classification and labeling of pesticide products in worldwide markets. … has the potential to benefit both the producers and consumers …”

♦ **Responsible Industry for a Sound Environment**: “…pesticide products…should be exempted from GHS requirements.” “EPA’s approval process insures that human health & the environment are protected. Implementation of GHS will do nothing to protect human health & the environment.”
Diversity of Comments on Value

♦ **Beyond Pesticides:** “...kudos to the Agency...for seeming to welcome the adoption of clearer, & therefore more protective, GHS policies.”

♦ **Syngenta:** “We strongly believe that GHS implementation on FIFRA labeling would result in a huge cost...without providing measurable benefits to human health & the environment.”

♦ **Consumer Specialty Products Association:** “CSPA has been an ardent supporter of the objectives of GHS &...recognizes the many benefits of harmonization that will result...including enhanced protection of human health & the environment; sound management of chemicals; reducing the need for testing of chemicals; & trade facilitation. However, many of our members have concerns about its implementation that must be addressed before proceeding.”
Focus of the First Dialogue Session

♦ Majority of comments on GHS had to do with implementation issues & majority of workshop will focus on those issues.

♦ However, with diverse opinions on the issue of “Why?” & “Whether?” of proceeding with GHS, we believe it’s worth spending time & having the first discussion session on this issue.

♦ Since some of the comments seem to be based on a misunderstanding of some of the GHS concepts, we want to start with addressing a couple of those issues to eliminate potential confusion.
Issue 1: Harmonization Solely for Harmonization’s Sake

“Changing…pesticide hazard communication system primarily for global harmonization is wrong…” Don’t revise “…solely under a broad banner of harmonization.”

♦ Principle Goal of GHS is Enhanced Protection.
  ♦ GHS: “Provision of information gives those using chemicals the...hazards of these chemicals, & allows the appropriate protective measures...”
  ♦ GHS: “GHS will enhance the protection of human health & the environment by providing an internationally comprehensible system for hazard communication.”
  ♦ GHS: “Successful hazard communication alerts the user to the presence of a hazard and the need to minimize exposures and the resulting risks.”

♦ Consistent FIFRA Goal: Protect public health and the environment from risks posed by pesticides and to promote safer means of pest control.
Effective Hazard Communication is Essential to Protection

Information = Protection
Confusion = Risk

Different systems of hazard classification & labeling can cause confusion & therefore potential risks.

Clarity/ Simplicity/ Consistency (Harmonization) = Effective Communication of Information = Improved Protection

♦ Long, inconsistent, dense labels inhibit maximum transmission of critical information that allows self-protection by end user.
♦ Small percentage of users consistently reading labels speaks to the need for simple assistive devices (symbols) to quickly convey important Hazard information.
Issue 2: Risk Assessment/Risk Management System Alone Provides Adequate Protection

“If GHS labeling was necessary to protect human health, it would only be because EPA was not meeting its statutory obligations.”

♦ Misunderstands the nature of the FIFRA Protective Scheme.

♦ Safe use requires multiple, integrated programs and activities by many participants in recognition that no single, independent action or stakeholder can ensure adequate protection.
FIFRA/FFDCA Statutory Scheme: Multiple Risks Require Multiple Protections*

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<thead>
<tr>
<th>Risk Reduction Thru Integrated Protection Programs</th>
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<tr>
<td>Risk Assessment</td>
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<td>Accurate risk identification &amp; characterization through sound data &amp; science</td>
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<td>Risk Management</td>
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<td>Determination of cost effective requirements to ensure safe use (Labels)</td>
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<td>Risk Mitigation</td>
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<td>Clear understanding &amp; effective use &amp; control practices at the frontline of pesticide use</td>
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<td>Risk Communication</td>
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<td>Informed citizens making sound personal &amp; societal risk decisions</td>
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Potential Pesticide Risks

Safe & Beneficial Use
Issue 3: GHS-Type Communication Improvement Has Limited Value in a Highly Regulated Public Health Setting

Many examples abound of the value of simplifying product level labels to improve the meaningful transmission of health & environmental information to the public:

- Simplified food nutrition labeling to promote informed health choices.
- Sunscreen SPF labeling to allow for improved self-protective decisions.
- Appliance energy conservation labels.
- Car mileage & safety information labels.
Issue 4: Symbols Won’t Enhance Protection Because Hazard Communication is Effective Now & New Symbols Will Just Create Confusion

“FIFRA hazard information is very well...understood.”

♦ Labels are complex and need improvement. Constant improvement is a core principle for risk reduction.
♦ Symbols are a simple, frequently used communication device that are a short hand means to effectively convey message.
♦ In the label situation, they would draw attention to other information. In combination with existing or improved label language & format, they would strengthen risk communication.
♦ Change is the norm with labels. In a dynamic scientific environment, they are constantly evolving to reflect changed requirements or circumstances.
Symbols Effectively Convey Information & Americans are Symbol Savvy & Flexible:
Issue 5: GHS Value Should be Documented Not Assumed

We recommend EPA “…conduct a comprehensive cost/benefit analysis of any incremental advantage that GHS may provide…before pursuing implementation.”

♦ Implementation of GHS would require changes to labeling regulations (Part 156).

♦ Federal law, Executive Orders and Agency policies require a comprehensive Economic Analysis as part of the proposal development process.

♦ The Economic Analysis is subject to public scrutiny in the proposal and comment process.

♦ Proceeding with development of a rule proposal package would allow the production of this analysis that stakeholders have requested.
Other Potential Benefits

♦ Potential cost savings to individual companies, EPA, federal government

♦ Promote interagency consistency: signal words, pictograms and hazard statements will have the same meaning in all settings, across all sectors: EPA, OSHA, DOT, CPSC

♦ Companies will only have to classify once

♦ Consistent labels also a NAFTA goal
Overall Goal: Achieve our common purpose of decreasing risk.

- GHS is a means to address some of the confusing aspects of risk communication through consistent symbols, signal words and hazard statements.

- GHS won’t be a cure-all, but an improvement,
  - Better pesticide labels through greater simplicity & consistency,

- Better hazard communication reduces risk through enhanced understanding.