

EPA to Implement a New Global System for Pesticide Labels

A multinational next step toward realizing a new international system for pesticide labels is slowly coming into stride. The culmination of more than a decade of work at the international level, the Globally Harmonized System for the Classification and Labeling of Chemicals (GHS) marks a significant step toward ensuring regulatory consistency among countries. As the EPA's extended comment period drew to a close yesterday, December 6th, the thrust of action is now shifting from international negotiation to national implementation.

The Globally Harmonized System is a voluntary system that does not impose binding treaty obligations on countries, but to the extent that countries adopt the GHS into national regulatory requirements, it will be binding on the regulated community. Although the GHS incorporates elements familiar to all pesticide labeling systems, the new system will affect all existing systems; all national systems of countries within the regulated community will have to be changed. Countries lacking systems for hazard classification and labeling are to adopt the GHS as the fundamental basis for national policies for the sound management of chemicals; countries that already have systems will align them with GHS.

To this end, in the United States, the U.S. Environmental Protection Agency (EPA) is working to revise its policies and achieve consistency with the GHS. The EPA has recognized that significant effort and time may be required to implement the GHS label changes. Accordingly, the EPA has stated that the change will take place in multiple stages over several years. The EPA invited comments on various implementation options outlined in the [White Paper](#), a statement in which the EPA outlines its current thinking on how to implement the GHS in ways that will maximize the benefits of harmonization while minimizing the burden on stakeholders. The comment period opened August 25 and closed on October 25, 2004. [Are comments available on line? If so, can we add a link?]

The benefits of harmonization have been heralded as universal. Countries, international organizations, chemical producers, and users of chemicals all stand to benefit as the GHS aims to: Enhance protection of humans and the environment; Facilitate international trade in chemicals; Reduce need for testing and evaluation; Provide a platform upon which countries can build comprehensive chemical safety programs; Ensure protections will not be reduced; Improve comprehensibility; Cover all types of chemicals; Address the intrinsic properties (hazards) of chemicals.

Differences in national hazard classification systems continue to impact both trade and protection. Under the current disparate systems, in the area of protection, target audiences such as workers, consumers, transport workers, and emergency responders, may see different label warnings or data sheet information for the same chemical. In the area of trade, the burden of compliance with multiple regulations regarding hazard classification and labeling can be costly and onerous, discouraging some small to medium enterprises from international trade in chemicals.

While national or regional governments are considered the primary audiences for the GHS at this point, the [GHS document](#) does provide some context and guidance for those in industry who will ultimately be implementing the national requirements that are adopted. GHS hazard classification criteria were adopted by consensus for physical hazards and key health and environmental classes, such as acute toxicity, carcinogenicity, and developmental toxicity. For each of these hazard classes, standardized label elements (i.e. symbols, signal words and hazard statements) have been developed and agreed on, along with a standard format and approach to how GHS information appears on safety data sheets. The [GHS document](#) also includes guidance on other issues relevant to implementation of the system, including product identifiers, confidential business information, and precedence of hazards.

The goal of harmonizing hazard labeling was originally articulated in 1989 at the International Labour Organization (ILO) convention on safety in the use of chemicals at work. A timeframe for accomplishing the goal was later provided at the 1992 UN Conference on Environment and Development (UNCED) by Chapter 19 of Agenda 21 on environmentally sound management of toxic chemicals: “a globally harmonized hazard classification and compatible labeling system, including material safety data sheets and easily understandable symbols, should be available, if feasible, by the year 2000” (13 June 1992, Earth Summit, Rio de Janeiro, Brazil). The next step of implementing the GHS was further endorsed by the 2002 World Summit on Sustainable Development (WSSD) and the Intergovernmental Forum on Chemical Safety (IFCS), which have established an implementation objective of January 1, 2008. The ultimate realization of a GHS may be many years to come but target audiences and industry should be sure to input their opinions now.

Guiding Principles For GHS:

- The need to ensure the health and safety of target audiences and the environment;
- The need to facilitate international trade and protect confidential business information;
- The need for a system that is simple, effective, easy to apply and takes account of the needs in developing countries;
- The need for compatibility with existing international instruments;
- The use of the harmonized hazard classification criteria;
- The comprehensibility, accuracy and completeness of information;
- The needs of target audiences;
- Some consideration of risk in communication to certain target audiences;
- The role of education and training;
- Recognition of the need for guidance.

The EPA is Interested in Receiving the Following Feedback:

- Regulations that may warrant review or possible revision;
- The use of a voluntary pilot project before the final rules are in place;
- The timing and sequencing of implementation;
- Coordination of implementation planning efforts with other groups to make the process more efficient (i.e. suggestions on work-sharing with the North American Free Trade Agreement Technical Working Group;
- Recommendations for conducting outreach and education activities.

LINKS:

- The recently adopted GHS document is available on the Internet at: <http://www.unece.org/trans/danger/publi/ghs/officialtext.html>.
- A “side-by-side comparison” made available by the EPA summarizes the current hazard classification and labeling policies and the corresponding elements of the GHS, available on the Internet at: <http://www.epa.gov/oppfead1/international/global/ghscriteria-summary.pdf> .
- The public can review the “white paper” that outlines EPA’s current thinking on how to implement the GHS through a Federal Register notice published on August 25, 2004, available on the Internet at: <http://www.epa.gov/fedrgstr/EPA-PEST/2004/August/Day-25/p19233.htm>.