



## Position Paper

### The Implementation of the Globally Harmonised System of Classification and Labelling of Chemicals

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***Product labels are the primary communication tool to farmers for the safe and effective handling of crop protection products. It is essential that labels convey a clear message on health and safety aspects of product use. CropLife International, through its member associations and leading companies, has worked extensively with regulatory authorities to develop product labels that are consistent with national regulatory decisions. Additionally, CropLife International has collaborated with the Food and Agriculture Organisation (FAO) to ensure that product labels, particularly those used in developing countries, are consistent, clear and applicable to local use.***

***CropLife International recognises that the Globally Harmonised System of Classification and Labelling of Chemicals (GHS) provides new opportunities for a rational approach to label harmonisation of chemicals, in contrast to crop protection products, on a global basis.***

***Application of GHS to crop protection products needs to be addressed by governments in a manner that does not undermine the extensive assessment process through which such products are already regulated and labelled. This would ensure that both the hazards and risks to the environment and human health are evaluated and communicated appropriately on the product label.***

#### Introduction

GHS has a history going back as far as 1990 when the International Labour Organisation (ILO) adopted a Convention and Recommendations on Safety in the Use of Chemicals at Work<sup>1</sup>. Adoption of this Convention required a country to have a system for hazard classification and labelling. Following substantial review of existing national systems by the UN Committee of Experts (CoE) for the Transportation of Dangerous Goods and the Globally Harmonised System of Classification and Labelling of Chemicals and subsequent endorsement by the UN Conference on the Environment and Development, Rio 1992, the CoE adopted the GHS in December 2002 with a desired implementation at the national level by 2008.

## **Crop Protection Products (CPPs)**

The benefits of using CPPs are part of a global, sustainable agricultural movement for the future; and the safe use of CPPs is a high priority of the entire plant science industry. CropLife International and its member associations work with governments worldwide as well as intergovernmental organisations (IGOs) to ensure that users of CPPs are trained and educated in the correct handling and use of such products.

CPPs are extensively tested and, in most countries, strictly regulated Product labels carry a wealth of information on the intrinsic hazards of the product and the potential risk to human health and the environment.

The World Health Organisation's hazard classification scheme for pesticides<sup>2</sup>, combined with risk and precautionary statements on product labels, provide advice to users on operator safety. This advice ranges from mixing and loading operations to requirements for application procedures and techniques and to practices necessary for environmental protection.

## **Testing and Evaluation**

CPPs are tested for acute toxicity effects on human health and wildlife, using internationally accepted test guidelines such as those of the Organisation for Economic Cooperation and Development<sup>3</sup>. For the assessment of a CPP, the hazard categories of GHS should be put into context by performing a risk assessment. The dose causing a hazardous effect should be compared with potential or actual exposure.

Test results are normally used to classify the product according to GHS. However, similar products can be classified by extrapolation from test results for a particular product provided there are no significant differences in the type of ingredients.

Inert ingredients in the pesticide formulation are evaluated through testing of the formulated product, through expert judgement, and by conducting a risk assessment.

## **Recommendations**

Insofar as governments intend to implement GHS, CropLife International believes that the following measures should apply:

1. The implementation of GHS allows a designated national authority to use discretion and a building-block approach to decide which GHS elements will be implemented on a national basis.
2. CropLife International strongly encourages all governments to work with their appropriate pesticide regulatory authorities to ensure that only those elements appropriate to CPPs are selected. This is necessary to ensure that the product label conveys consistent messages.

3. In order to ensure the safe use of products, labels should continue to carry the appropriate procedures for managing the potential risks to the users as has already been done prior to the advent of GHS.
4. The work of FAO and the crop protection industry on product labelling and the use of specific pictograms in developing countries should be preserved and be consistent with the overall aims of the FAO International Code of Conduct on the Distribution and Use of Pesticides<sup>4</sup>.
5. When classification changes are proposed for a product label, the regulatory authority should consider the value of such changes to the product user and the risks and benefits of adopting the changes.
6. When classification changes are recommended, appropriate communication needs to be made to all product users and the necessary transition period allowed for orderly implementation.
7. Where test data are available, they should always be used to determine classification, in preference to values extrapolated from other sources.
8. FAO Specifications should be used to determine similarity of products before extrapolating classification criteria from one product to another. When considering similar products, the general GHS rules on extrapolation using comparable data should be followed.
9. CropLife recommends that self-classification schemes be considered when implementing GHS.
10. All governments should work closely with neighbouring countries to ensure consistency in assessments so as not to impede the recognised and regulated trade in CPPs.
11. When assessing a CPP, regulatory authorities must respect the intellectual property rights of data submitters to the data they have provided in support of classification and labelling.
12. CropLife International encourages the development of appropriate capacity at a national level to achieve classification and labelling based on sound science and rigorous evaluation of reliable data.
13. To the extent that GHS is implemented, a smooth transition is called for to avoid market disruption.

## Conclusion

CropLife International has a long history of working constructively with regulatory authorities and IGOs on the assessment of CPPs and the safety of their uses.

CropLife international believes strongly that such processes should be based on science and actual risk in order to ensure continuous improvements in the protection of human health and the environment.

Governments are encouraged to work together when considering classification and labelling to foster international harmonisation and thus avoid potential barriers to trade.

GHS provides opportunities to harmonise classification and labelling for chemicals and thus facilitates international trade in chemicals. However the benefits for the crop protection products are less clear considering the extensive existing regulatory requirements.

CropLife, therefore, urges governments to make as much use as possible of the flexibility built into GHS in order to avoid confusing farmers with contradictory messages concerning the safety to human health and the environment of using CPPs.

## References:

<sup>1</sup> Convention concerning Safety in use of Chemicals at Work. International Labor Organisation; Convention C170, Geneva 1990.

**Website:** <http://www.ilo.org/ilolex/cgi-lex/convde.pl?C170>

<sup>2</sup> The WHO Recommended Classification of Pesticides by Hazard and Guidelines to Classification. Corrigenda published by April 12, 2005 incorporated. IPCS, Geneva 2004

**Website:** [http://www.who.int/ipcs/publications/pesticides\\_hazard\\_rev\\_3.pdf](http://www.who.int/ipcs/publications/pesticides_hazard_rev_3.pdf)

<sup>3</sup> OECD Guidelines for Testing of Chemicals. Full list of test guidelines. Paris March 2006.

**Website:** <http://www.oecd.org/dataoecd/9/11/33663321.pdf>

<sup>4</sup> International Code of Conduct on the Distribution and Use of Pesticides (Revised version). Food and Agriculture Organisation of the United Nations, Rome 2003.

**Website:** <http://www.fao.org/ag/agp/agpp/pesticid/main.htm>

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