

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Sub-Committee of Experts on the Globally
Harmonized System of Classification
and Labelling of Chemicals

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IMPLEMENTATION OF THE GHS

FAO-questionnaire related to the impact of the new Globally Harmonized System of Classification and Labelling of Chemicals (GHS) on the labelling of agricultural pesticides

Introduction and background

In November 2005 the FAO Panel of Experts on Pesticide Management at its first Session initiated the review of the *FAO Guidelines on Good Labelling Practice for Pesticides* (1995) to reflect and incorporate the “Globally Harmonized System of Classification and Labelling of Chemicals” (GHS) through the recommendation that “FAO commission an analysis of the implications that the GHS may have for the guidance on pesticide labelling¹”.

FAO informed the OECD Working Group on Pesticides, the Task Force on Harmonisation of Classification and Labelling and the Sub-Committee of Experts on the GHS about its intention and developed the attached questionnaire (Annex 1). The questionnaire was sent out in July 2006 to national authorities for pesticides in OECD and non-OECD countries.

Results

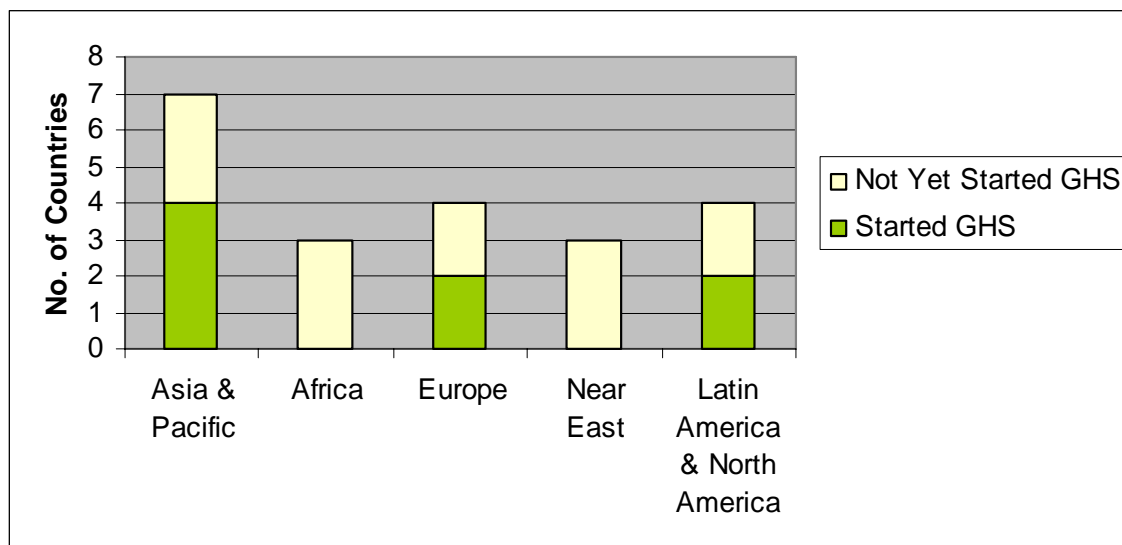
Responses from 21 countries were received until early October 2006, namely from Algeria, Australia, Burkina Faso, Burundi, Cambodia, Canada, Chile, China, Costa Rica, Egypt, Germany, Italy, Japan, Kenya, Malaysia, Mauritius, Norway, Sweden, Syria, Thailand and U.S.A.

The responses reflect a mixture between OECD and non-OECD countries and represent a broad geographical coverage with replies from Africa (3), Asia and the Pacific (7), Europe (4) the Near East Region (3) and from Latin and North America (4).

The implementation of GHS for pesticide labelling has been initiated in eight countries in three regions, see table 1.

¹ FAO (2005). Report of the First Session of the Panel of Experts on Pesticide Management. Available at <http://www.fao.org/AG/AGP/AGPP/Pesticid/>

Table 1: Countries which have started to implement GHS for pesticide labelling



The majority of countries, however, still rely on the guidance provided by FAO and WHO, in particular the “WHO Recommended Classification of Pesticides by Hazard”² for the toxicological classification of pesticide products.

In general, it should be noted that many countries did either not respond to questions or did state “not appropriate”. A few countries provided detailed background documentation on their process of GHS. The following selected responses are listed in order to demonstrate the dimension associated with the implementation of GHS at national level:

- the number of agricultural pesticide products registered in a country range from 141 to 22,000;
- only one country stated that it would change the “Material Data Safety Sheet (MSDS)” with the implementation of GHS;
- the majority of countries will continue using the FAO pesticide handling pictograms on the labels;
- responses referring to the question “how many active ingredients have changed their toxicity class with respect to the previous system” ranged from 0% to 7%;
- the required legislative tools for implementing GHS vary from laws to regulations, to directives, to guidelines. Furthermore, 5 countries indicated a foreseeable impact of GHS on other national legislation.

Conclusions

The implementation of GHS on the labelling of agricultural pesticides is world-wide still at its infancy stage. Certain advancement can be observed within the Asian Pacific Region. Many countries, in particular non-OECD countries, will continue to use FAO guidelines and FAO pictograms, also after the implementation of GHS. The toxicological classification continues to be based on the “WHO Recommended Classification of Pesticides by Hazard”².

² WHO (2004) Recommended Classification of Pesticides by Hazard and Guidelines to Classification. Corrigenda. World Health Organization, IPCS Geneva.

Therefore, it would currently not be advisable to develop a pesticide labelling guideline which would entirely be based on the GHS, in particular as there is no international reference yet available for each pesticide under the toxicological classification of the GHS.

Hence, there is a need for an interim guidance document, and the FAO Panel of Experts on Pesticide Management recommended at its Second Session, held in Rome, from 7 to 10 November 2006, that during the present transition period the new “FAO Guidelines on Good Labelling Practice” should cover separately both the existing WHO classification system for pesticides as well as the new classification based on the GHS system. The responses to the questionnaire also indicate the reliance on and the necessity for a single independent international reference source for the classification of each pesticide, in particular in non-OECD countries. In this respect, there is an urgent need to harmonize the GHS toxicological classification and the WHO classification of pesticides by hazard.

Annex 1



**FAO-questionnaire related to
the impact of the
new Globally Harmonized System of Classification and
Labelling of Chemicals (GHS)
on the labelling of agricultural pesticides**



FOOD AND AGRICULTURE ORGANIZATION
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FAO-questionnaire related to the impact of the new Globally Harmonized System of Classification and Labelling of Chemicals (GHS) on the labels of agricultural pesticides

<p>Has your country started to work on GHS implementation?</p> <p>If yes, by when?</p>	
<p>Which is the classification system applied in your country to agricultural pesticides prior to GHS?</p>	
<p>Are you implementing GHS, for pesticide labeling, in its totality or only certain parts of it? In the latter case, which parts of the GHS are not (yet) implemented?</p>	
<p>How many agricultural pesticide products are registered in your country?</p>	
<p>Which changes on the pesticide labels will be introduced with GHS in terms of toxicity, for both human health and environment in your country?</p>	
<p>Did you have to make any other changes to pesticide labels in order to comply with GHS (e.g. related to personal protection)?</p>	
<p>Did you change the Material Safety Data Sheet (MSDS) with the implementation of GHS? If yes, what changes were made?</p>	



FAO-questionnaire related to the impact of the new Globally Harmonized System of Classification and Labelling of Chemicals (GHS) on the labels of agricultural pesticides

After introduction of GHS will you maintain the FAO pictograms on the labels? If not, please state why?	
In percentage, how many active ingredients have changed their toxicity class with respect to the previous system?	
In percentage, how many final products preparations have changed toxicity class with respect to the previous system?	
In percentage, how many preparations were in the RUP (Restricted Use Pesticides) category in the previous system?	
In percentage, how many preparations are now classified under the RUP (Restricted Use Pesticides) category of GHS?	
What has been the impact of GHS at the level of <ul style="list-style-type: none">• manufacturing• formulation• transport• distribution• storage• use• disposal Please provide your responses on a separate sheet of paper	



FAO-questionnaire related to the impact of the new Globally Harmonized System of Classification and Labelling of Chemicals (GHS) on the labels of agricultural pesticides

What kind of legislative tool has been used for implementing GHS (e.g. Law (Act), Directive, Regulation, Guideline, Recommendation)?	
What kind of control action/enforcement has been provided for ensuring the correct application of GHS?	
Is there any foreseeable impact on other national related legislation in your country?	

Note: If any national policy or technical documents/reports have been written on the implementation of GHS for pesticide labelling in your country, please provide electronic copies or internet links.
