

The GHS and Plant Protection Products in the EU. An introductory industry's perspective.

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- ❑ **GHS = Globally Harmonized System for Classification & Labeling**
 - ❑ Developed and adopted (July 2003) by the United Nations Economic and Social Council (ECOSOC)

- ❑ **CLP = Classification, Labeling & Packaging**
 - ❑ Regulation EC No. 1272/2008, adopting (most of) the GHS for the EU jurisdiction
 - ❑ In force since January 20, 2009
 - ❑ Implementation staggered across many years, end of transition June 2015

Substance - oral toxicity LD₅₀ = 257 mg/kg

GHS	Danger (Skull & Cross Bones)
Transport	liquid: slightly toxic; solid: not classified
EU	Harmful (St Andrew's Cross)
US	Toxic
CAN	Toxic
Australia	Harmful
India	Non-toxic
Japan	Toxic
Malaysia	Harmful
Thailand	Harmful
New Zealand	Hazardous
China	Not Dangerous
Korea	Toxic

- ❑ Consistent hazard classification and communication globally, to enable control of chemicals exposure, and protect human health and environment
- ❑ Long term: facilitate global trade of chemicals
- ❑ A very good purpose (when completed and implemented by all nations)

- To- date: only Japan, S Korea, New Zealand, China, Taiwan, South Africa, EU adopted
 - More are being added
- **Only New Zealand and EU adopted for plant protection products**
 - **Australia and South Africa announced intention**
- **FAO/WHO have not yet adopted GHS**
- **The United States have not yet committed to GHS !**

Globally un-Harmonized System for Classification & Labeling?

Europe	New Zealand (ERMA)
<ul style="list-style-type: none"> •Acute toxicity 3 •Aquatic acute 1 •Aquatic chronic 1 	<ul style="list-style-type: none"> •Acute toxicity 2 •Skin irritation 3 •Eye irritation 2 •Target organ systemic toxicity 1 •Aquatic acute 1 •Aquatic chronic 1 <p><i>Specific HSNO categories:</i></p> <ul style="list-style-type: none"> •Soil toxicant •Terrestrial vertebrate toxicant •Terrestrial invertebrates toxicant
<i>Annex VI to CLP Regulation</i>	<i>classifications are based on the HSNO (Hazardous Substances and New Organisms) legislation</i>

- ❑ This presentation is not a technical introduction on GHS, nor an exploration of all the impact of GHS in the EU

- ❑ Guidance available from ECHA and DG Enterprise
 - ❑ [ECHA Website – Classification](#)
 - ❑ [CLP legislation, guidance and archives - Chemicals - Enterprise and Industry](#)
 - ❑ [ECHA Website - REACH helpdesk](#)

- ❑ Available for exchanges, seminars, etc. Just email: <mailto:mbalboni@dow.com>

- ❑ **Massive changes** versus current status
- ❑ **Some classification criteria change**
- ❑ **Hazard communication elements change**
 - ❑ **label statements and symbols (pictograms)**
- ❑ **No more Risk Phrases but Hazard Statements**
 - ❑ **(H followed by a 3 digit number, e.g. R65 becomes H304)**

GHS pictograms



Aquati

Aquati

RBC

Physica

Expl
Flarr
Flarr
Oxid
Pres

Flarr
Flarr
Self
Pyro
Pyro
Self
Wate
Oxid
Oxid
Orga
Corn

RBC



RBC

7

7

Tomorrow = GHS



- Harmful if swallowed.
- Causes serious eye irritation.
- Harmful if inhaled.
- Very toxic to aquatic life with long lasting effects.
- Flammable liquid and vapour.
- May be fatal if swallowed and enters the airways.
- May cause respiratory irritation.

Today = EU DPD



- R10 Flammable.
- R20/22 Harmful by inhalation and if swallowed.
- R36/37/38 Irritating to eyes, respiratory system and skin.
- R50/53 Very toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment.
- R65 Harmful: may cause lung damage if swallowed.

- ❑ 4 important themes (non exhaustive list) :
 1. One classification and labeling harmonized system, at least within the EU, please !
 2. Implementation & certainty of regulatory frame
 3. Who will train farmers/ NGOs, Food Chain, regional IPM authorities, etc.?
 4. Resources!

One classification and labeling harmonized system, at least within the EU, please !

- Classification is decided at EU level for plant protection and biocide substances**
 - Member States Competent Authority propose & comment**
 - ECHA RAC makes recommendations to EU Commission**

- Classification of mixtures (= products) part of Member States authorization process**
 - Let's apply common sense: the hazard of a mixture does not change with location**

- Non- EU countries (particularly if next in accession) should align with EU timelines and harmonized classifications for substances**

Implementation & certainty of regulatory frame

- CLP Regulation sets a date for compliance for mixtures (= plant protection products): June 01, 2015**
 - Nothing obliges Member States to require any earlier date
 - Understand complexity of clean-up along whole supply chain

- Example: Member States to require/review new classifications when product registrations expire or are amended, over time**

- Allow industry to collect information for e.g. coformulants**
 - Many of which are blends (= mixtures)

- For SDS, understand how REACH Title IV provisions apply (or not) to plant protection products; apply common sense**

Training & awareness

- **Farmers**
 - Hazard and risk-based labeling coexisting on same label for plant protection products
 - Does too much information on label defeat the purpose?
 - Do Member States remember Annexes VI and V to 91/414/EEC (Dir. 2003/82/EC) ?
 - Providing **EU- harmonized EU labeling for risk assessment-based label mitigations** (SPe1-8 etc.)
- **Food Chain, NGOs, “Sustainable Use” actors, General Public**
 - Misuse* of hazard classification & labeling to generate lists of “bad” and “good “ pesticides
 - Hazard classification is not a *better evidence* of the risk of a chemical
 - Authorization = Risk Assessment = hazard + exposure (from use)

Resources

- **Industry and competent authorities need staffing, expertise & time**
 - ECPA estimates 50 MM€ for member companies
 - Adjusting the whole supply chain is matter of years
- **Apply common sense: GHS was not invented specifically for Plant Protection Products**
- **Industry and competent authorities are partners in this**

- ❑ GHS/CLP massive workload **and changes** for all
 - ❑ Competent authorities, industry, farmers, etc.

- ❑ Let's cooperate for implementation

- ❑ Many thanks for your attention. Any questions?

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