

The Protective Value of GHS

**Bill Diamond, Director
Field and External Affairs Division
Office of Pesticide Programs**

**Stakeholder Public Meeting
October 18-19, 2006**



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.

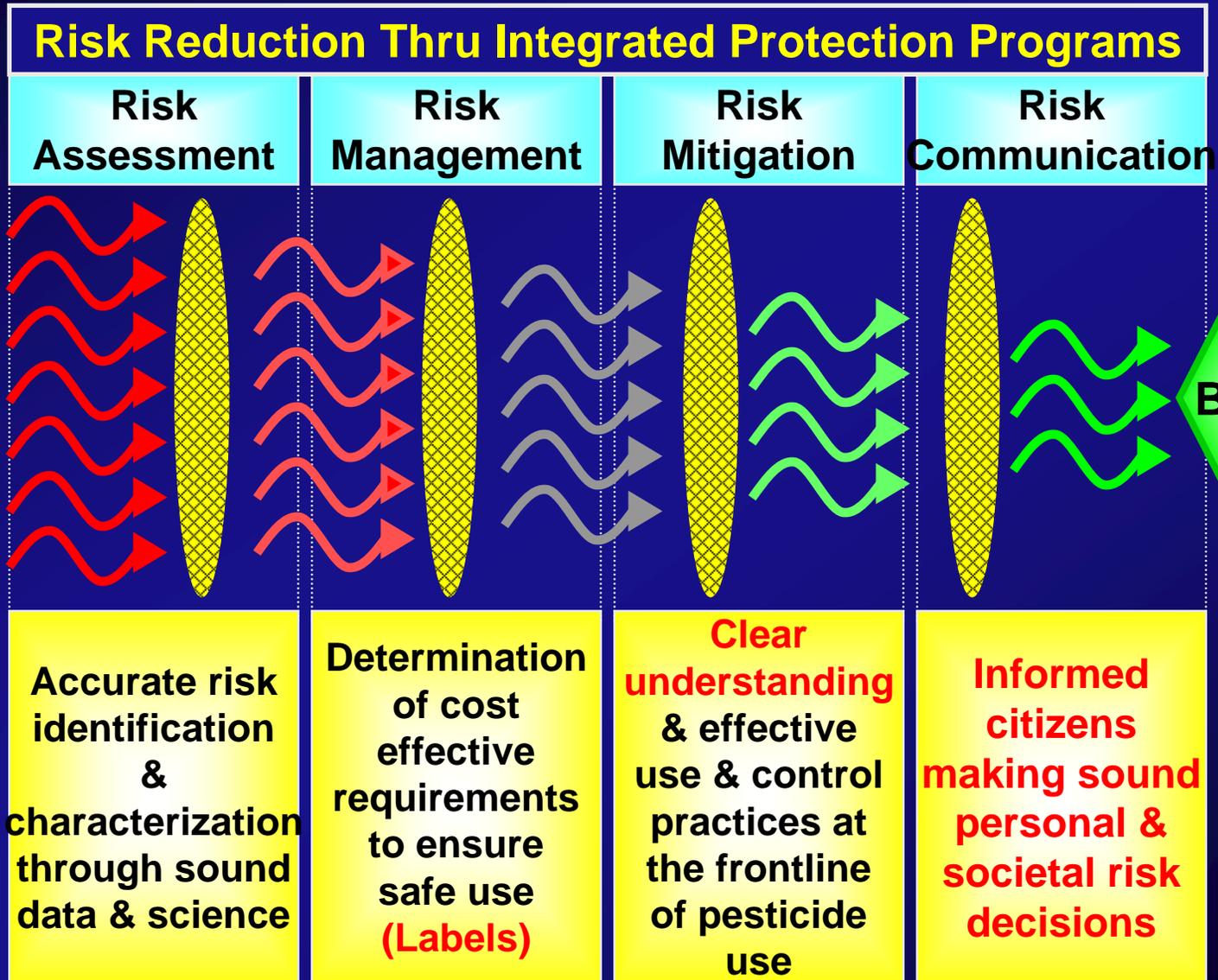


Issue 2: Risk Assessment/Risk Management System Alone Provides Adequate Protection

“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*





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.