

## **Patricia D. Hastings**

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**Cc:** <candace.bartholomew@uconn.edu>  
**Sent:** Friday, October 22, 2004 4:33 PM  
**Subject:** Options to implement a new international system for pesticide labels projected for 2008

*Note: EPA Comment period on this extended to December 6, 2004 through Notice in Federal Register today. See 'Background' below for implementation issues and APPSE subcommittee.* NJinPAS will keep you apprised of this ongoingly.

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### **Action:** EPA Seeks Comment on Plans to Apply New Global System to Improve Pesticide Labels –

News Release--Excerpted from EPA Pesticide Program Updates from EPA's Office of Pesticide Programs 08/27/04.

EPA is requesting comments on a white paper that describes various options the Agency is considering for implementing a **new international system for pesticide labels**. Called the **Globally Harmonized System of Classification and Labeling of Chemicals, or GHS**, the new system sets out criteria for classifying chemical hazards and communicating those hazards on labels and safety data sheets. Countries have traditionally used different systems for informing workers and consumers about physical, health, and/or environmental hazards associated with the use of chemicals. More uniform and harmonized labels will improve communication regarding chemical safety for consumers and workers, and reduce barriers for companies engaged in international trade. After working for more than a decade with national and international partners and stakeholders to create a globally harmonized system, EPA and other agencies in the United States that regulate chemicals are preparing for adoption of the new classification criteria and label elements.

The Agency is particularly interested in receiving feedback on the following:

- (1) regulations that may warrant review or possible revision;
- (2) the use of a pilot project before the final rules are in place;
- (3) the timing and sequence of implementation;
- (4) coordination of implementation planning efforts with other groups to make the process more efficient;
- (5) and recommendations for outreach and education activities.

EPA recognizes that significant effort and time may be required to implement the GHS label changes and conduct effective outreach and education activities. EPA foresees this process occurring in multiple stages over several years. The comment period began Aug. 25 and closes Oct. 25 (**revised by FRN to December 6, 2004**). The white paper and a side-by-side comparison of the GHS with EPA's current pesticide labeling policies are available for review and comment on EPA's Web site at: <http://cfpub.epa.gov/pesticides/comments.cfm> .

**Background:** The 1992 UN Conference on Environment and Development (UNCED, or Earth Summit), mandated that the U.S. and other countries and stakeholders work to develop the GHS. More than a decade later, in **July 2003**, the United Nations Economic and Social Council (ECOSOC) **formally adopted the GHS** and authorized its translation into official UN languages and dissemination throughout the world.

EPA provides that the 1992 UNCED, the 2002 World Summit on Sustainable Development (WSSD) and the

Intergovernmental Forum on Chemical Safety (IFCS) have all endorsed the need for the GHS, and IFCS and WSSD have **set a goal of 2008 for its implementation**. Hence- the issue at hand is **not what the GHS is** (as it has been internationally agreed upon); rather, **the issue is how and when it will be implemented** in the United States.

The GHS is a **voluntary system for participating nations** and they are not subject to any binding treaty obligations. But, it will be enforceable through national regulations. EPA states that the key U.S. agencies involved in the GHS include the Consumer Product Safety Commission (CPSC), the Environmental Protection Agency, the Department of Labor Occupational Safety and Health Administration (OSHA), and the Department of Transportation (DOT).

For pesticide applicators, the label is the law. So, the **impact of changes in the pesticide label will necessarily require much outreach and education** by agencies such as the New Jersey Department of Environmental Protection Pesticide Control Program and Rutgers Cooperative Extension to incorporate new label information into manuals, training, and exams. This is a huge undertaking requiring much advanced preparation and partnership. **The American Association of Pesticide Safety Educators Issues and Evaluations Committee has formed a subcommittee to comment on the GHS Federal Register Notice and corresponding white paper to communicate the impact on the licensed pesticide user community and the corresponding outreach and regulatory agencies. It is chaired by Candace Bartholomew** of the University of Connecticut. ([candace.bartholomew@uconn.edu](mailto:candace.bartholomew@uconn.edu)).

**Sources:** [Federal Register: August 25, 2004 (Volume 69, Number 164)][Notices][Page 52262-52264] <http://www.epa.gov/EPA-PEST/2004/August/Day-25/p19233.htm>; and EPA Pesticide Program Updates from EPA's Office of Pesticide Programs 08/27/04. See extension of comment period @ [Federal Register: October 22, 2004 (Volume 69, Number 204)][Notices][Page 62046-62047]<http://epa.gov/EPA-PEST/2004/October/Day-22/>  
The complete current text of the GHS is posted on the Internet at [www.unece.org/trans/danger/publi/ghs/officialtext.html](http://www.unece.org/trans/danger/publi/ghs/officialtext.html).

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