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

(Seventh session, 14-16 July 2004
agenda item 2,c,ii)

UPDATING OF THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Terrestrial Hazards

Issues to be addressed to develop the classification and labelling for Terrestrial Environmental Hazards

Comments by Croplife International

1. Background

At the fifth session of the Sub-Committee, the OECD presented paper ST/SG/AC.10/C.4/2003/2. This paper reviewed current and historical work in this area and posed several questions regarding the technical feasibility and characteristics of a scheme for the classification and labeling for terrestrial environmental hazards. The OECD was asked to further develop the issues to be addressed when developing a system for classification of hazards to the terrestrial environment.

2 Comments

When considering developing any new classification and labelling scheme, Croplife International believes that both the technical feasibility and the costs/benefits of the scheme need to be considered. Only if a new scheme is technically feasible and there is a clear benefit, should a new scheme be implemented.

The OECD, in paper UN/SCEGHS/7/INF.15 have concluded that development of a scheme for hazard classification and labelling of terrestrial environmental hazards is technically feasible. Croplife International would like to make the following comments about the cost/benefits of such a scheme.

- **Lack of data**

There is very little terrestrial toxicity data for the majority of chemicals. Analysis of the IUCLID database performed by CONCAWE, showed that only 3.3% of chemicals listed on this database had any information for toxicity to soil dwelling organisms or terrestrial plants. The pesticide sector has the largest amount of data available for these endpoints. GHS does not force data generation and

development of a classification scheme for terrestrial hazards cannot be expected to change this situation. It can be expected that a classification scheme for terrestrial environmental hazards would largely affect pesticides and other similar chemicals that are deliberately released into the terrestrial environment

- **Pesticides are already governed by specific regulations**

Pesticides are deliberately designed to be released into the terrestrial environment. Their release is approved and controlled by specific national regulations under defined conditions.
These conditions ensure that non-target species are not adversely affected

- **Potential for confusing labels**

A hazard classification and labelling scheme would ignore the specific conditions that regulate the use of pesticides and result in warning about a hazard that did not result in harm. This would create confusion without creating any benefits:
e.g. the UK abandoned using hazard based classification/labelling for honey bees because it caused confusion when a product was labelled as very toxic to honey bees although the product was labelled for use on flowering crops when bees are present.
(A detailed assessment showed there is no risk to bees at the recommended rates of application). It is more effective to instruct users how to avoid risks.
A similar scenario can be envisaged whereby a herbicide would be labeled "toxic to plants"
In order to be effective, labels must not be overloaded. Adding several hazard-based phrases, which might apparently contradict the conditions of use, would compete for much needed label space at the expense of other information and attract the reader's attention away from the main safety messages.

- **Complexity of a comprehensive scheme**

Pesticides have highly selective action between different groups of organism.
E.g. they can be very toxic (hazardous) to non-target arthropods but have a low toxicity to plants.
The hazard can also be very dependent on the route of exposure, for example a pesticide can have a high hazard to plants when foliage is exposed but low hazard when exposed via soil.
A separate scheme would be required for each group of organisms, such as mammals, birds, plants, honey bees, non target arthropods, earthworms and soil microorganisms. It would also be necessary to distinguish between the different routes of exposure for some organism, such as plants.
Any scheme that tried to take this diversity into account would inevitably be very complicated.
Generalized classifications, such as "Hazardous to the Terrestrial Environment" are of little benefit and would be misleading if applied to already complex pesticide labels

3 Conclusion

In conclusion, Croplife International believes that the development of a scheme for the classification and labelling for terrestrial environmental hazards would create confusing labels and would be burdensome without creating additional benefits.

_____