

# **The Implementation of the Globally Harmonized System of Classification and Labelling of Chemicals and Labelling of Pesticides**

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## **SUMMARY**

Pesticide labels are a fundamental communication tool to farmers for the safe, responsible, and effective handling of pesticides. It is essential that labels convey a clear and concise message on health and safety aspects of product use. CropLife International, through its member associations and companies, has worked extensively with regulatory authorities to develop product labels that are compliant with national regulatory frameworks. Additionally, CropLife International has collaborated with the Food and Agriculture Organisation (FAO) to ensure that product labels, particularly those used in developing countries, are consistent, clear, and applicable to local use.

CropLife International recognizes that the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) provides opportunities for a globally harmonized approach to labelling, primarily, of industrial chemicals, on the global market.

As GHS is a modular framework, its actual scope must be decided at country level as part of the implementation into national law. In the context of pesticides, considerations are needed as to how to incorporate the extensive assessment process through which such products are already regulated and labelled. This would ensure that both the hazards and risks to the environment and human health are evaluated, and the relevant information is communicated appropriately on the product label.

## **INTRODUCTION**

In 1992, the Global Harmonized System of Classification and Labelling of Chemicals (GHS) was agreed to strengthen and standardize national and international efforts to achieve an environmentally sound management of chemicals. GHS addresses classification of chemicals by types of hazard and proposes harmonized hazard communication elements, including labels and safety data sheets.<sup>1</sup> The United Nation's Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals and its GHS subcommittee reviewed and integrated existing national systems, culminating in the adoption of GHS in 2002, with a target for national implementation by 2008. As of 2024, although the implementation primarily impacts industrial chemicals, it is increasingly also being applied to pesticides.

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<sup>1</sup> UN Conference on Environment and Development, Rio de Janeiro 1992, Agenda 21, chapter 19: Environmentally sound management of toxic chemicals, including prevention of illegal international traffic in toxic and dangerous products. <https://sustainabledevelopment.un.org/content/documents/Agenda21.pdf>

## PESTICIDES

Pesticides are an integral part of globally sustainable agriculture and require stringent safety measures within the plant science industry. CropLife International and its member associations collaborate with governments worldwide and intergovernmental organizations (IGOs) to ensure proper training is provided on correct handling and use to those who use pesticides.

Pesticide active ingredients and pesticide product formulations undergo rigorous testing and are subject to comprehensive legislation. Labels provide extensive hazard and risk information, crucial for safe handling and use. Systems like the WHO's Classification Scheme for pesticides<sup>2</sup>, paired with GHS, inform users about safety practices from mixing through to application, ensuring both operator and environmental safety.

## TESTING AND EVALUATION

Pesticides are tested and characterized for toxicity to humans and the environment, generally using internationally harmonized and accepted test guidelines such as those from the Organization for Economic Cooperation and Development (OECD)<sup>3</sup>. The relevance and applicability of GHS hazard categories must be contextualized within the risk assessment framework of registration processes while comparing hazardous doses to exposure levels.

Toxicological test results can be used to classify substances/mixtures under GHS. However, the primary objective when registering a pesticide product is to assess the risk of the product. This risk assessment can also build on extrapolated data if the difference between two constituents are considered negligible – the so-called “read-across”.

## RECOMMENDATIONS

As national governments implement GHS for pesticides, CropLife International recommends:

1. Governments should utilize a building-block approach, providing national authorities discretion in selecting GHS elements.
2. Governments should engage, within inter-governmental discussions, with pesticide regulatory authorities to maintain consistent product labeling activities.
3. Labels should continue to include risk management procedures to ensure the safe use of products.
4. FAO's work on labeling and pictograms should be preserved, aligning with the International Code of Conduct on Pesticide Management<sup>4,5</sup>.

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<sup>2</sup> The WHO Recommended Classification of Pesticides by Hazard and guidelines to classification, 2019 edition <https://www.who.int/publications/i/item/9789240005662>

<sup>3</sup> OECD Guidelines for Testing of Chemicals. <https://www.oecd.org/chemicalsafety/testing/oecdguidelinesforthetestingofchemicals.htm>

<sup>4</sup> The International Code of Conduct on Pesticide Management <https://www.fao.org/pest-and-pesticide-management/pesticide-risk-reduction/code-conduct/en/>

<sup>5</sup> Guide for Industry on the Implementation of the International Code of Conduct on Pesticide Management [https://croplife.org/wp-content/uploads/2023/09/CropLife-International\\_Industry-Guide-for-International-Code-of-Conduct-on-Pesticide-Management\\_June-2023.pdf](https://croplife.org/wp-content/uploads/2023/09/CropLife-International_Industry-Guide-for-International-Code-of-Conduct-on-Pesticide-Management_June-2023.pdf)

5. When classification changes are recommended and introduced for a product label, due to the implementation of GHS, appropriate communication is provided to all product users, and adequate transition periods are allowed to ensure orderly implementation.
6. Classifications are derived from the use of data generated through compliance with Good Laboratory Practice (GLP) and follow internationally recognized test guidelines such as those from OECD.
7. FAO's specifications for formulated products should be used to determine similarity of products before extrapolating classification criteria from one product to another. When considering similar products, the general GHS rules on extrapolation using comparable data should be followed.
8. Self-classification: Classifications are made by the company which supplies the substance/mixture/product on the market, see box below.
9. Governments should work closely with neighboring countries to ensure consistency in assessments so as not to impede the recognized and regulated trade in pesticides.
10. Respect and implement conditions which safeguard the legitimate intellectual property rights of data submitters during classification and labeling.
11. Ahead of national enactment of GHS, national authorities must ensure they have sufficient capacity, expertise and institutional capabilities to deliver a workable and functional implementation.
12. National authorities should facilitate a smooth transition to GHS, including transitional periods, to prevent market disruptions.
13. National regulations relating to the classification and labelling of pesticides should be consistent with the provisions of GHS.
14. To ensure GHS standards are based on international consensus and sound science-based decision making thus can support harmonized trade, revisions to GHS should be first considered at international level and not merely transpose evolutions in any one parties' national rules.

Self-classification means that pesticide suppliers are responsible for defining and implementing the correct classification and the authorities' role is to ensure that pesticide suppliers fulfill their responsibilities. Specifically this means that a pesticide supplier is not required to seek approval for each classification prior to use but that they must be able to demonstrate compliance to their authorities when requested. This ensures the most efficient implementation of GHS by allowing authorities to concentrate on their enforcement role whilst ensuring that the responsibility for correct classification lies clearly on the pesticide supplier

## CONCLUSIONS

CroLife International has a long history of working constructively with regulatory authorities and IGOs on the assessment of pesticides and their safe use.

CroLife international strongly believes that such assessments should be based on science and actual risk to ensure continuous improvements in the protection of human health and the environment.

Governments are encouraged to work together when considering classification and labelling to foster international harmonization and thus avoid potential barriers to trade. This also helps ensure consistent communication to users about safe management of pesticides internationally.

GHS are robust internationally agreed approaches to harmonize classification and labelling of chemicals and thus facilitate international trade.

CropLife International, therefore, urges governments to embrace the flexibility provided by the GHS' building block approach to help users with clear and consistent messages concerning the safety to human health and the environment when using pesticides.