

The Globally Harmonized System of Classification and Labelling of Chemicals (GHS)

Implications for Pest Control Products in Canada

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Overview of Pesticides Regulatory System

- **Pest Control Products Act (PCPA) governs pesticides regulation**
- **administered by Pest Management Regulatory Agency (PMRA)**
- **assessment of risk and value relative to proposed use**
- **information addressing safety, merit and value required on labels**
- **approval process involves extensive review, including label**





Label approval is part of the registration process

- **conditions of registration governing use of product**
- **communicates hazard, provides advice on risk mitigation**
- **pesticide products must bear approved label**

...



Label approval (cont)

- **legally binding document; changes must be approved by PMRA**
- **use in manner inconsistent with label directions or limitations is prohibited**
- **PCPA 2002 will not affect fundamental aspects**



Labelling encompasses hazard-based and risk-based approach

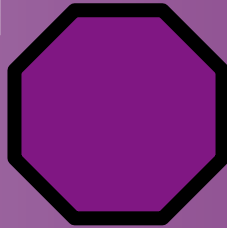
- **Pest Control Products Regulations (PCPR) stipulate types of label information**
- **symbols and associated signal words**
 - ***nature and level of hazard***
 - ***physical and acute health hazards***
 - ***Schedule III of the PCPR***
- **label comprehension and clarity are critical to ensure safe use**



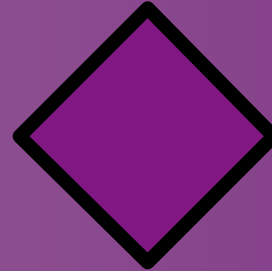
Pesticide Symbols



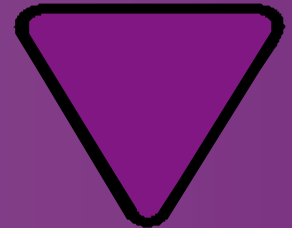
Pesticide Border Shapes & Signal Words



DANGER



WARNING



CAUTION



***PMRA has criteria for hazard
identification/classification
purposes:***

- **flammable, corrosive, acutely toxic, irritating**
- **3 levels of hazard in increasing severity:**

CAUTION, WARNING, DANGER

- **symbol and signal word verification performed by PMRA**



Other health and environmental hazards

- **risk assessment approach**
 - ***identify the hazard***
 - ***estimate exposure***
 - ***determine risk***
- **mitigation measures appear on label as condition of use**



Disclosure of hazardous ingredients

- **active ingredient and guarantee on label**
- **no regulatory requirement to disclose other hazardous ingredients**
- **PCPA 2002**
 - ***active ingredient and components of health or environmental concern (Health Canada list)***
 - ***not considered Confidential Business Information***
 - ***new regulations could require listing on MSDS and label***



Material Safety Data Sheets (MSDS)

- **not a current requirement**
- **PCPA 2002**
 - ***required for workplaces where product is used or manufactured***
 - ***content to be prescribed in regulations***
 - ***GHS taken into account***



PMRA defines market classes

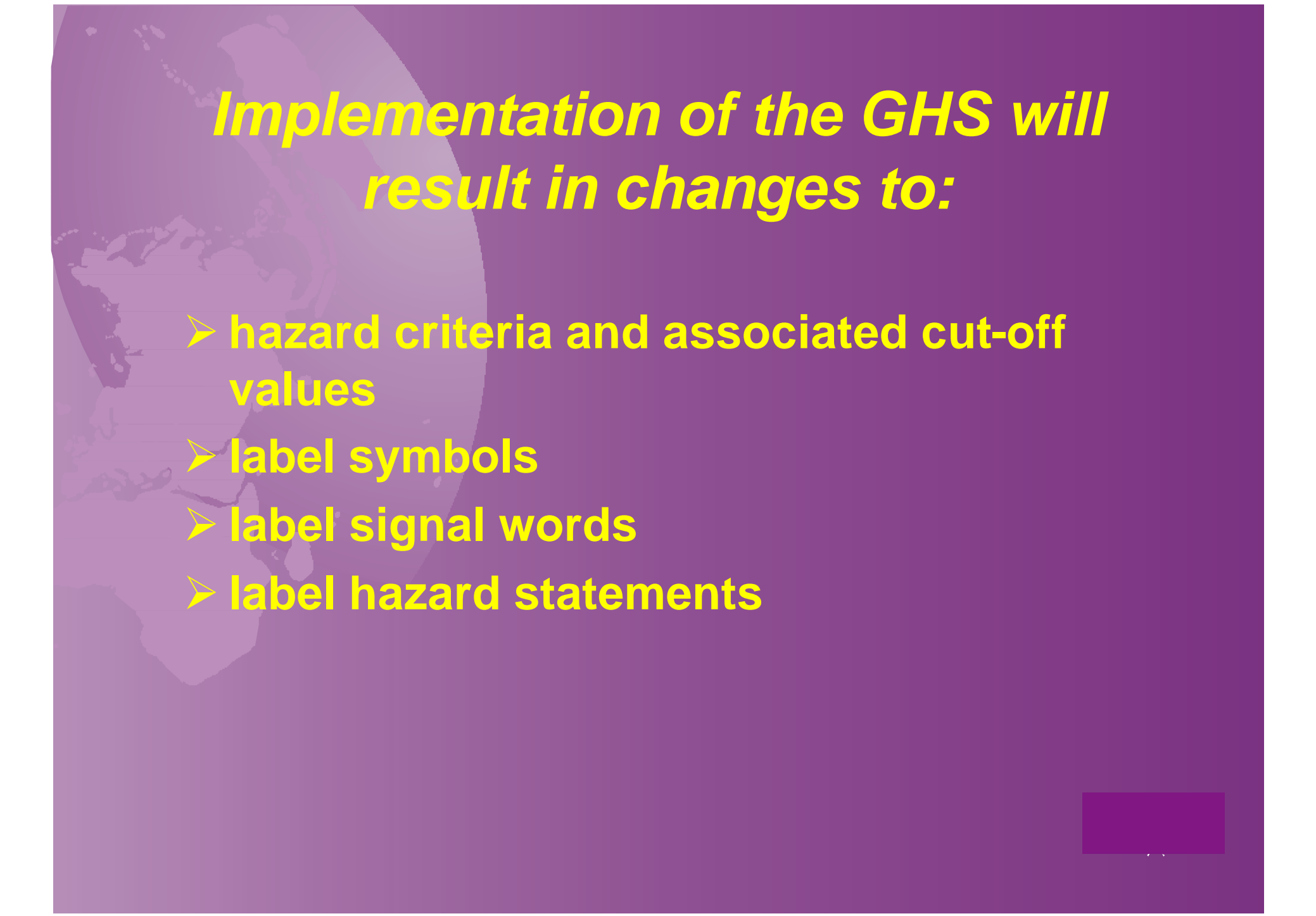
- **framework for provincial regulation of sale and use**
- **Domestic, Commercial, Restricted**
- **intended uses, package size, potential risk, and inherent hazards**
- **labels must show designated market class**



F/P/T Committee on Pest Management and Pesticides

- **proposal for modifications to federal market class system**
- **harmonization of federal and provincial systems**
- **cutoff values for acute toxicity generally in line with GHS**
- **allow for incorporation of other GHS hazards later**





Implementation of the GHS will result in changes to:

- **hazard criteria and associated cut-off values**
- **label symbols**
- **label signal words**
- **label hazard statements**



Symbol Implications

PESTICIDES	GHS	
		
		
		
		



Implementation of the GHS (continued)

- **new hazard symbol on many pesticides used in/around the home**
- **comprehension issues**
- **market class eligibility due to change in acute toxicity cut-offs**
- **realign market class health hazard criteria**



Implementation of the GHS (continued)

- **label for hazards beyond current approach**
- **linkages to other labelling initiatives**
- **implementation time line**
- **mechanism of implementation**



<http://www.hc-sc.gc.ca/pmra-arla>





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Health Canada
Pest Management Regulatory Agency

Santé Canada
Agence de réglementation de la lutte antiparasitaire

