

ALIGNMENT WITH GHS CRITERIA for crop protection products

Producers should anticipate a number of changes to the labelling and handling of crop protection products that will come into play over the next few months and years. By Paul Hardman and Paula Bester



The changes are coming about as SA aligns relevant regulations with the Globally Harmonized System (GHS) of Classification and Labelling of Chemicals (i.e. the GHS criteria).

Why the GHS criteria?

The efficiencies and transparency associated with a globally common approach to classifying potentially hazardous chemicals are attractive to regulators. Especially because they can eliminate duplication of time and effort in the application for, and evaluation of each active substance. This is particularly relevant here in SA where a large backlog of applications under The Fertilizers, Farm Seeds, Seeds and Remedies Act 36 of 1946 still needs to be processed by the Registrar's office, which currently has limited resources to address this backlog.

Also, having different systems for classifying active substances can lead to different outcomes for the same substance in different countries, causing uncertainty and trade barriers. End users may be unable to access new technology or those tools that are available to competitors and neighbours quickly enough. However, the overall objective of the GHS criteria is to improve safety of the Plant Protection Product (PPP) users, bystanders, consumers and reduce the impact of PPP use on the environment.



Paul Hardman



Paula Bester

Development of the GHS criteria

Work to create a worldwide harmonised system began as early as 1992, coordinated under the United Nations. The main focus has been on the hazard classification of substances (according to their health, physical and environmental hazards) and the consistent labelling of PPPs on containers

and safety data sheets. Labelling is deemed important because it adequately informs all role-players about the risks associated with the active substance, and ways to mitigate against the risks at each stage from manufacture to transport, storage, use and post-application. The GHS criteria are now in their ninth revised edition and are readily available on the internet.

Adoption of GHS criteria by SA

South Africa is now proactively adopting the GHS criteria across a number of relevant regulations including:

- Regulations for Hazardous Chemical Agents, 2021. These changes come into effect on 29 September 2022 (although derogations can be applied for in some circumstances).
- Fertilizers, Farm Feeds, Seeds and Remedies Act 36 of 1947.
- Occupational Health and Safety Act 85 of 1993.

Main implications for PPP users

Alignment with the GHS criteria has a number of implications for the crop protection industry:

• Changes in the labels on containers.

Growers will need to familiarise themselves with new layout of labels and the various pictograms indicating the appropriate hazard classification and risk mitigation requirements (e.g. use of gloves, face masks). See Figure 1. Please note that the previous colour coding or colour band with pictograms based on the WTO/FAO hazard classification

will no longer apply – the GHS follows a different approach now. Currently, the crop protection industry is revising and updating all product labels (submissions began in April 2022) to comply with these requirements. Derogations are possible where products have already been labelled and are in stock (depending on the manufacturing date).

• Withdrawal of actives based on their GHS classification:

In April 2022, the Registrar of Act 36 of 1947 notified the crop protection industry that substances classified as a 1A or 1B Carcinogenic, Mutagenic or Reproductive Toxin (CMRs) under the GHS would have their registration withdrawn. This implies that CMRs category 1A and 1B shall not be placed on the South African market or used after 1 June 2024 as substances, constituents of other substances, in mixtures or be supplied to the general public.

This is a deviation in the way actives have been treated historically where the risk assessment process was used to assess the risks of each active substance rather than its hazard classification alone. The Citrus Growers' Association (CGA) has been participating in various working groups to evaluate which active substances used in the citrus industry will be implicated. Ironically, while adopting the GHS criteria is expected to simplify the regulatory process, there is a great deal of detail and complexity that this decision by the Registrar has introduced. Specifically, the classifications depend to a large extent on the formulation and other "inert" or adjuvant substances in the final product. Each supplier is now required to defend their particular product before the Registrar and depending on the co-formulants, may or may not be withdrawn.

The CGA is also actively engaging with Citrus Research International (CRI) to consider the impact on any of the key active substances. This has implications for the direction of research aimed at

filling gaps and finding alternatives where possible.

• Department of Employment and Labour (DEL) audits:

Routine and random checks by the DEL will now also take into consideration the GHS criteria where all parties handling PPPs will be required to have an understanding of the GHS criteria and demonstrate appropriate safe handling of products.

• Adaptation to GAP audits:

The CGA also anticipates that the audit process for certification schemes such as GlobalG.A.P., will now be influenced by the introduction of GHS criteria. This is an indirect implication in the sense that these certification schemes require users of crop protection products to follow the "laws of the land" – which are now being increasingly explicit to recognise the GHS criteria. The CGA has consulted with SIZA and GlobalG.A.P. where the general

feedback is that the use of GHS criteria will be taken into account in the assessments for responsible PPP handling and storage.

Way forward

The CGA will continue to engage with CRI and the crop protection industry to help stakeholders transition to this new regime for handling crop protection products. In the long run the benefits of safer and responsible use of crop protection products are expected to outweigh the anticipated costs and disruption over the next few months and years.

The CGA strongly recommends that growers consider getting training for a better understanding of the labelling and handling considerations. ▶

In the long run, the benefits of safer and responsible use of crop protection products are expected to outweigh the anticipated costs and disruption.

Flame	Flame over circle	Exploding bomb
Corrosion	Gas cylinder	Skull and crossbones
Exclamation mark	Environment	Health hazard

Figure 1. The colour bands with pictograms will be replaced with new GHS aligned labelling.

Source: https://unece.org/sites/default/files/2021-09/GHS_Rev9E_0.pdf