



Brian R. Leahy

Director

Edmund G. Brown Jr.

Governor

California Notice 2015-05
(Supersedes California Notice 2014-04)

TO: Pesticide Product Registrants and Other Stakeholders

SUBJECT: GLOBAL HARMONIZED SYSTEM CHANGES TO PESTICIDE LABELS
AND THE SELF-CERTIFICATION TEMPLATE

This notice clarifies the Department of Pesticide Regulation's (DPR's) position regarding changes in the Global Harmonized System of Classification and Labeling of Chemicals (GHS) and provides a template that registrants may use to identify GHS changes on proposed labels. The Occupational Safety and Health Administration aligned its Hazard Communication Standard with GHS and now requires chemical manufacturers to classify chemicals according to new criteria, and to update both product labels and safety data sheets.

For pesticide products requiring registration with the U.S. Environmental Protection Agency (U.S. EPA), DPR will follow the guidance provided by U.S. EPA in Pesticide Registration (PR) Notice 2012-01, available at <http://www.epa.gov/PR_Notices/pr2012-1.pdf>. PR Notice 2012-01 states that in granting a registration, U.S. EPA must determine the pesticide's "labeling" complies with the requirements of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). U.S. EPA has not yet amended its labeling regulations to reflect the GHS.

For pesticide products that require registration in California but do not require federal registration (e.g., spray adjuvants), DPR instructs the registrants to adhere to both GHS label features and the California labeling requirements in Title 3 of the California Code of Regulations §6235-6243. Where there is a conflict, registrants may follow GHS labeling. Elements with possible conflict include:

- 1) Signal Words
- 2) Hazard statements
- 3) Precautionary Language
- 4) First Aid statements
- 5) Storage and Disposal statements

For all non-GHS label elements, registrants of California-only products must continue to follow California labeling regulations, which incorporate by reference FIFRA labeling requirements for pesticide products. It is acceptable for registrants to use further restrictive FIFRA language.



When submitting a GHS updated California-only label to DPR, please specify in the cover letter that the label incorporates or has been updated to incorporate appropriate GHS elements. In addition, please provide a completed “Certification of Occupational Safety and Health Administration’s Global Harmonized System Compliance Template” located at <http://cdpr.ca.gov/docs/registration/cert/ghs_certification.pdf>. The template may be printed on the registrant’s letterhead. Alternatively, please include in the cover letter a full justification for using the GHS elements as a replacement for changed or deleted FIFRA wording.

If you have questions regarding this notice, please contact Mr. Richard Spas, Pesticide Registration Branch Ombudsman by e-mail at <Richard.Spas@cdpr.ca.gov> or by telephone at 916-322-9522.

Original signed by

April 1, 2015

Ann M. Prichard, Chief
Pesticide Registration Branch
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Date

cc: Mr. Richard Spas, DPR Senior Environmental Scientist (Supervisor)