



California Notice 2014-04

GLOBAL HARMONIZED SYSTEM CHANGES TO PESTICIDE LABELS AND SAFETY DATA SHEETS

This notice establishes the Department of Pesticide Regulation's (DPR) position regarding recent changes in the Global Harmonized System of Classification and Labeling of Chemicals (GHS), particularly with regard to human hazard signal words, hazard statements, and pictograms on product labels. The Occupational Safety and Health Administration (OSHA) aligned its Hazard Communication Standard with GHS and require chemical manufacturers to classify chemicals according to new classification criteria, and update labels and safety data sheets (SDS).

With regard to pesticide products that require registration with the U.S. Environmental Protection Agency (U.S. EPA), DPR will follow the guidance provided by U.S. EPA in Pesticide Registration Notice 2012-1 at <http://www.epa.gov/PR_Notices/pr2012-1.pdf>. This notice 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.

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

- 1) Signal words; and,
- 2) Hazard statements

For all non-GHS label elements, registrants of California-only products should continue to follow California labeling regulations, which incorporate by reference FIFRA labeling requirements for pesticide products.

When submitting a GHS updated California-only label to DPR, please note in your cover letter the label has been updated to include appropriate GHS elements and provide a justification as to why the GHS elements are an appropriate replacement for any FIFRA wording deleted.



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

Original Signed by

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Date

cc: Mr. Richard Spas