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**Date:** Mon, 06 Dec 2004 10:22:11 -0800  
**To:** <[AAPSE@LISTSERV.VT.EDU](mailto:AAPSE@LISTSERV.VT.EDU)>  
**Subject:** AAPSE comments on global harmonization

To: AAPSE membership  
From: Joanne Kick-Raack, Chair, Issue and Evaluation Committee  
Re: Comments on Global Harmonization

As the national network of pesticide safety educators/trainers and enforcement personnel, the implementation of the Global Harmonization System will significantly impact our programs. A subcommittee of AAPSE volunteers drafted comments to submit to EPA and these comments were voted on and approved by the AAPSE board. The comments were submitted by eDocket last week.

For your information as a member, attached are the official AAPSE comments. The deadline for comments is today, Monday, Dec. 6, 2004. We also encourage individual members to comment on behalf of their state. The docket number is OPP-2004-0205.

The home page for EPA's eDocket is  
<http://docket.epa.gov/edkpub/jsp/pub/Welcome.jsp>

I want to thank the subcommittee members, Candace Bartholomew (chair), Carol Ramsay, Jim Criswell, Joel Miles, Kerry Hoffman-Richards and Gary Fish for their work in crafting the comments for AAPSE.

Joanne

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ATTACHMENT:

**COMMENTS ON GLOBAL HARMONIZATION SYSTEM**  
**...submitted to EPA – Dec. 6, 2004**

The American Association of Pesticide Safety Educators (AAPSE) is submitting these comments as representative of its membership. Membership consists primarily of Pesticide Coordinators from Land Grant Universities who conduct pesticide safety education programs across the country and State Lead Agency personnel who are responsible for testing and certifying pesticide applicators, and enforcing pesticide regulations in the United States.

As the national network of pesticide safety educators/trainers and competency and enforcement personnel, the implementation of the GHS will significantly impact our programs. We have several concerns related to the proposed implementation plan and outreach activities and plans.

First we applaud EPA for adopting all GHS physical hazard classes and corresponding label elements including pictograms and signal words. These will provide the user or handler with substantially more information about pesticide products. We also commend the decision to maintain precautionary statements including first aid and storage and disposal statements. As to the question of requiring telephone numbers as part of supplier identifier information on labels we agree that telephone numbers should be required.

In considering implementation mechanisms, OPP has stated that it has two guiding principles; “the mechanisms used should be fair to the regulated community and should minimize the resource burden placed on OPP and on stakeholders to the extent possible.” It is our view that the regulated community consists of a variety of stakeholders. Industry is one group of stakeholders including those who sell, handle or apply pesticides such as: retailers, dealers, applicators, consultants. Worker Protection Standard trainers, handlers and workers are also primary stakeholders. Additionally, those involved with training and regulating pesticide users and handlers must be considered primary stakeholders for any implementation plan to function smoothly and to be effective.

AAPSE embraces proposed implementation option 2. Integrating GHS into ongoing registration and re-registration actions and label changes submitted by industry that come in for OPP review as part of routine business. This would keep costs down and allow more time for outreach to the user community which will facilitate a more smooth, safe transition at the user level.

Updating EPA’s acute toxicity data base is well over due. A revised updated data base will facilitate reviewing new labels as GHS changes are made. This work should be completed before any new labels are issued.

AAPSE does not support the idea of a pilot project before final rule changes are in place. If a pilot project is launched and there has been little or no outreach material developed and few or no applicator/user trainings on signal words, symbols and pictograms, EPA is only testing how to get the labels into the market, and not determining whether the handler or end user will have any understanding of the new labels. Education must come before the labels are on the shelf.

It would be very beneficial to educators and regulatory personnel to have as many questions and situations answered on GHS, as possible, prior to implementation. Experience with other regulatory changes involving pesticides, such as the Worker Protection Standard and the Endangered Species program have demonstrated that when answers to questions are vague or information is not clearly conveyed, at or before the time of implementation, confidence and credibility of trainers and regulators is lost.

Outreach to the user and handler community and its associated costs must be considered as a primary part of the implementation of GHS for pesticides, not as secondary. Outreach is as important to successful and safe implementation as how the EPA Office of Pesticide Programs registration staff will handle approving new labels. In order to effect a smooth transition it will be necessary, early on in the implementation plan, to get basic information into the hands of the people who sell and handle pesticide products; retailers, dealers, applicators, consultants, master gardeners, Worker Protection Standard trainers, handlers, and workers. A mechanism to assist in funding the direct costs and person hours involved in revising all state/national certification exams, study materials, digital/video media and websites should be considered. Since signal words and labels are fundamental to pesticide certification and training, extensive changes will need to occur in a wide array of publications and media.

Based on reference points from the text of the white paper, the timeline which EPA would like to pursue is: rulemaking in 2004, rules in 2005, implementation in 2006 and full compliance in 2008. We believe that not one new label should be allowed on the market until initial outreach efforts and support materials are in place. AAPSE strongly suggests that by the time rulemaking is complete the rudimentary outreach of a simple fact sheet that addresses the new usage of signal words, symbols, and pictograms is in place and entered into the training arena, initially as awareness. Full incorporation into training manuals, exams and the long list of other resources which are currently in place should occur during GHS implementation. (REMOVE and final compliance.

On the question of timing on implementation AAPSE offers the following additions to the suggested time frames indicated in the white paper:

2004

Initiate rule making.

Initiate development of outreach materials, most particularly a fact sheet that can be utilized in training and added to study manuals as an addendum prior to manual revisions.

#### 2005

Finalize rule.

Finalize development of outreach materials. Develop outreach material appropriate to move into trade outlets (attached to containers, including copies in shipping boxes). Work with retailers to provide these materials to customers.

Extension initiates work on updating training materials.

States prepare to decouple existing state regulations tied to the current classification system.

#### 2006

EPA and educators initiate formal education campaign.

Fully include new signal words, symbols, and pictograms as formal portion of training programs for applicators, retailers, etc. Revision of existing pesticide safety outreach materials (study manuals, fact sheets, magnets, etc.) continues.

States re-write pesticide applicator certification exams to reflect GHS changes.

#### 2007

States complete the process of decoupling existing state regulations tied to current pesticide classification system.

States begin to introduce new exams reflecting GHS label changes.

Extension continues to train applicators and handlers about GHS changes.

#### 2008

Full implementation has been achieved.

OPP continues to revise incoming labels

Extension finalizes revisions of any materials that were not revised in 2006 and 2007 and continues outreach education for users and handlers of pesticides.

State implementation of new exams takes place.

AAPSE is willing and ready to work with the EPA GHS Implementation Work Group to facilitate a smooth transition to the new labeling program. It is our primary concern that users understand the hazards presented with the use of pesticides and have the knowledge and skills necessary to use them responsibly.