

## Chemical Labelling Requirements

Chemicals manufactured or imported before 1 January 2017 can continue to be supplied without needing to meet the labelling requirements under the Globally Harmonized System, or GHS, of the model Work Health and Safety Regulations.

Safe Work Australia CEO Michelle Baxter said that Members agreed to this approach on 25 November 2016 in response to concerns raised by chemical suppliers.

"This approach will ensure a smooth transition to the GHS, and will avoid an unnecessary burden on suppliers to re-label existing chemical stock," Ms Baxter explained.

The full media release from SafeWork Australia dated 5/12/16 is available at the following official page: <http://www.safeworkaustralia.gov.au/sites/swa/news/pages/05122016-labelling-requirements>

The requirement to comply with GHS now applies to hazardous chemicals manufactured or imported on and after 1 January 2017. The label of any chemicals already in the supply chain continue to be acceptable. This ruling applies to all hazardous products, not just agvet pesticides

Most SDS have changed this year to meet GHS requirements

### UPDATING SDS

Manufacturers have until 1st January 2017 to provide GHS compliant SDS. Behind the scenes, Garrards have been working hard with our suppliers to have GHS compliant SDS available to post on Garrards web site. Most SDS available at [garrards.com.au](http://garrards.com.au) have been updated to be GHS compliant.

### HOW TO TELL IF A SDS IS GHS COMPLIANT

- Expect that any SDS updated in 2016 is GHS compliant
- Section 2 of the SDS will be titled 'Hazard Identification' and may include reference to GHS.
- Hazardous products will have H (health) and P (precautionary) statements rather than R (risk) and S (safety) statements.
- Pictograms (see below) are part of the GHS system but are not mandatory on SDS.
- If the product is non-hazardous, there is no need to change the SDS.

DISTRIBUTION OF SDS TO YOUR CUSTOMERS – Many pest management companies servicing food premises, hospitals, schools, mines etc will need to replace most of the SDS at sites with GHS compliant SDS. Garrards encourage pest management companies to distribute SDS electronically to customers, and this is an ideal time to change over. We have checked with auditors of food premises and they accept SDS held electronically.

### CHANGES TO LABELS

Garrards customers will see a gradual change in labels of hazardous goods over 2017 as product manufactured or imported from 1/1/17 flows from the manufacturers through Garrards to you.

Some products will have a GHS text box and others will not change. The requirements for labels is confusing. For instance, there are exemptions for APVMA registered pesticides if there is already similar wording on the approved label or if the label is too small to allow space for GHS wording or pictograms.

### HISTORY OF GHS

The global standard classification system for hazardous chemicals was initiated at the United Nations conference in Rio in 1992. It was subsequently agreed and the first edition of classification was available in 2000. Some countries, including New Zealand, adopted edition 1. Australia is adopting edition 3 (2009).

The aim of the GHS was to create a single worldwide methodology for chemical classification, labelling and Safety Data Sheets (SDS). The system should ensure that users are provided with practical, reliable and easy to understand information on chemical hazards, and can take the appropriate preventive and protective measures for their health and safety. GHS was also promoted as providing significant trade benefits to industry as well as improved health and safety outcomes by introducing internationally consistent assessment criteria, labels and SDS for hazardous chemicals.

Once the hazard of the product is classified the statements on SDS are fixed and mandatory if deemed required. All formulation components are assessed (not just the active ingredient – an EC product may now appear more hazardous when the solvent system is taken into account).

CONFUSION - Safe Work Australia (Work Health and Safety Regulations) adopted GHS in 2012 for implementation on 1 January 17. Because pesticides are already regulated by the APVMA, the pesticide manufacturers had an expectation that these products would be exempted from the relatively minor changes to Safety Data Sheets and labels to be compliant with GHS.

An unofficial announcement on the 25th of November stated SafeWork Australia had agreed to change the method of implementation of GHS compliance. From the 1st of January 2017 compliance was changed from supply of product to enduser to compliance at import and manufacture. The press release from Safe Work Australia confirmed this.

The GHS legislation was brought in to capture the myriad of products of which the hazard was relatively unknown compared to the strict label requirements of the APVMA registered pesticides. The biggest problem has been confusion.

- Confusion about whether APVMA registered products would be exempt.
- Confusion as to whether distributors would be physically able to comply at the same deadline set for manufacturers and importers.
- Confusion because the manufacturer and importer of hazardous chemicals have a duty to correctly classify a chemical before the chemical is supplied to a workplace. Various manufacturers have interpreted the classification of similar products differently, producing different SDS hazard levels and leading to confusion of the actual label and SDS requirements.

In preparation of SDS, it would be expected that products with the same amount of the same active ingredient in the same type of formulation would have similar SDS. However, to prepare a SDS the first step is to assess the classification of the hazard of the product by self-determination. There appears to be differences in interpretation of hazard of those preparing SDS for apparently similar products. Garrards have compared many SDS of apparently similar products already completed and were amazed at the differences in signal headings and allocation of hazard categories.

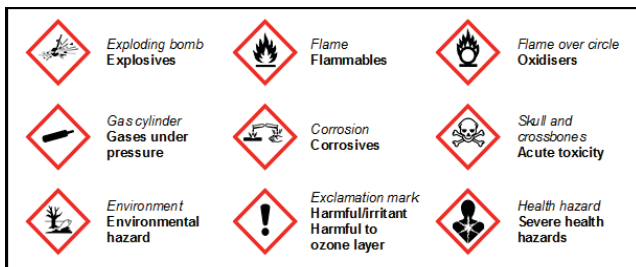
### More Information:

[www.safeworkaustralia.gov.au](http://www.safeworkaustralia.gov.au)  
[www.garrards.com.au](http://www.garrards.com.au)



## Pictograms

The hazard pictogram and signal word may be omitted from the labels of Agvet chemicals. There are nine hazard pictograms in the GHS which represent the physical, health and environmental hazards. These are named: Explosives, Flammables, Oxidisers, Gasses under pressure, Corrosives, Acute toxicity, Environmental hazard, Harmful/irritant Harmful to ozone layer and Severe health hazards.



There are now two systems of pictograms (both generated by the United Nations) in operation – the UN initiated GHS for hazardous product and packaging and the UN Classes of Dangerous Goods required for transport.

Note: the WHS Regulations allow manufacturers and importers to continue to use dangerous goods class labels on containers for workplace hazardous chemicals. Dangerous goods class labels are those pictograms that are used on dangerous goods containers to meet transport requirements under the Australian Code for the transport of dangerous goods by road or rail (ADG) Code. Some examples of dangerous goods class labels are shown below.

## Signal words

The GHS uses 'Danger' and 'Warning' as signal words to indicate the relative level of severity of a hazard. 'Danger' is used for the more severe or a significant hazard, while 'Warning' is used for the less severe hazards.

There are now two systems of signal headings on labels in operation – GHS 'Danger' and 'Warning' (used on SDS of Agvet hazardous products) and the APVMA scheduling system of 'Dangerous Poison', 'Poison' and 'Caution' for the labels.

Visit the Safe Work Australia website and check out:

- FAQs
- Labelling of agricultural or veterinary chemical products
- Preparation of SDS for agricultural or veterinary chemical products

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MEDIA PRESS  
RELEASE  
FROM



GHS COMPLIANT  
CHEMICAL  
LABELLING & SDS  
REQUIREMENTS

Update to GHS  
compliant  
Safety Data Sheets  
by 1st January 2017

*Variation to Global  
Harmonised System  
Introduction on  
1st January 2017*



# SDS and Chemical labelling requirements