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INFORMATION SHEET FOR MANUFACTURERS AND IMPORTERS OF AGRICULTURAL AND VETERINARY (AGVET) CHEMICALS

From 1 January 2017 most Australian states and territories will require workplace hazardous chemicals to be labelled in accordance with the Globally Harmonized System of Classification and Labelling (GHS).



Under the <u>model Work Health and Safety</u> (WHS) Regulations labels for hazardous chemicals used in workplaces must contain the following GHS labelling elements: signal words, pictograms, hazard and precautionary statements. They must also include the contact details and address of the Australian manufacturer or importer.

Some elements on AgVet chemical labels, such as first aid and safety directions, are approved by the Australian Pesticides and Veterinary Medicines Authority (APVMA) based on a health and safety risk assessment carried out by the APVMA. From 1 January 2017 the model WHS Regulations require additional GHS information on the labels of AgVet chemicals used in the workplace.



What do the WHS Regulations require on AgVet chemical labels?

A partial exemption from workplace chemical labelling has been provided for AgVet chemicals to recognise information already required on the labels of AgVet chemical products. The only elements required under the model WHS Regulations for registered AgVet chemicals are GHS hazard and precautionary statements. Signal words and pictograms are not required on labels for AgVet chemicals.

Hazard statements communicate the intrinsic hazards of a chemical including their severity. Hazards can include the ability of the chemical to:

- catch fire (flammability)
- cause burns (corrosivity)
- cause poisoning (acute toxicity)
- effect the nervous system, liver, kidney or other organ (specific target organ toxicity)
- cause cancer (carcinogenicity), or
- cause allergic reactions.

Precautionary statements provide advice on the recommended measures to prevent or minimise adverse effects resulting from exposure to the hazardous chemical.



AgVet labels were recognised under previous workplace chemical

labelling laws, why is this additional information required now?

The labels of AgVet chemicals often do not specify all of the hazards that the chemical has, especially physico-chemical hazards like flammability and chronic health hazards like carcinogenicity. This information is only included in the chemical's safety data sheet.

The label is the most common and easily accessed source of information for hazardous chemicals. Including hazard and precautionary statements on the label ensures workers handling AgVet chemicals, who may not have read the safety data sheet, are provided with the same kind of information about the hazards of the chemicals as workers in other sectors.



Do I have to include hazard and precautionary statements on AgVet labels

which are consumer products?

If an AgVet product is packaged in the same quantity as a consumer product and is likely to be used in the same manner and frequency as in a home or domestic setting then workplace labelling requirements do not apply. If the packaged quantity and concentration is not consistent with consumer use then workplace labelling requirements apply.

Example 1

A one litre container of glyphosate weedkiller at 100 g/litre active ingredient is sold through

retail outlets for home and garden use and is advertised as 'Home and Garden Weedkiller".

This product would not have to comply with the WHS labelling requirements.

Example 2

A 20 litre drum of glyphosate weedkiller at 450 g/litre active ingredient requiring dilution of one litre in 100 litres sold through specialist horticultural or rural supply stores would be considered as intended for workplace use. Hazard and precautionary statements are required on the label, and safety data sheets must be available upon request.







What about veterinary medicines?

Labels for veterinary medicines which are not consumer products must include hazard and precautionary statements as required by the WHS Regulations. An exemption to WHS labelling for veterinary medicines applies at the point of intentional administration to animals to allow

for dilution or decanting of the veterinary medicine into another container or syringe for immediate use.



When do I have to put new labels on my products?

If you are a manufacturer or importer of an AgVet chemical that is also a workplace hazardous chemical you will need to include hazard and precautionary statements on the label. This information is required on products supplied on or after 1 January 2017.

AgVet chemicals which are not classified as hazardous according to the requirements of the GHS do not require hazard and precautionary statements on the product label.

Does the APVMA need to approve my new label?

No, the APVMA does not need to approve the inclusion of hazard and precautionary statements on the product label.

Where do I find hazard and precautionary statements for my chemical?

The hazard and precautionary statements for a hazardous chemical are determined by its classification. The hazard and precautionary statements are listed in section 2 of the safety data sheet for the chemical.



As the manufacturer or importer you are required to prepare safety data sheets for all workplace hazardous chemicals, including for AgVet Chemicals.

The Code of Practice: Preparation of Safety

<u>Data Sheets for Hazardous Chemicals</u> provides
guidance on safety data sheets.



The <u>Code of Practice: Labelling of</u> <u>Workplace Hazardous Chemicals</u>

provides guidance on which precautionary statements should be included, and which can be omitted.



Some statements already appear in the AgVet label sections on first aid, safety

directions or storage and disposal. Do I need to repeat these?

No, not if the statements are equivalent or substantially the same. For example, the following GHS and APVMA labelling statements are considered equivalent:

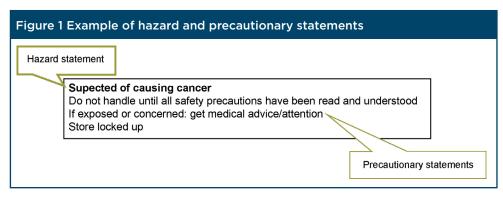
GHS statement	Equivalent APVMA statement
May cause an allergic skin reaction	Repeated exposure may cause allergic disorders
Toxic if inhaled	Product and spray are poisonous if inhaled
Wash hands thoroughly after handling	Wash hands after use
Take off contaminated clothing and wash before reuse	After each day's use, wash gloves, goggles and contaminated clothing.

The statements already on the AgVet chemical label must not be changed in any way.



Where do I put the hazard and precautionary statements on the label?

Hazard and precautionary statements should be separated from the other AgVet label elements, for example by placing them in a clear text box. An example of how hazard and precautionary statements would look on an AgVet label (See Figure 1).





Can I include GHS pictograms on my AgVet chemical label?

Yes, you can include the GHS pictograms appropriate to the classification of the chemical if you choose to. For information on the use of pictograms on labels please see the Code of Practice: Labelling of Workplace Hazardous Chemicals.





What about AgVet chemicals packed in small containers?

Labels for small containers should include as much GHS hazard and precautionary information as it is reasonably practical to include. At a minimum they must include a hazard statement for the most significant hazard that is not already communicated by the AgVet chemical label. If all of the hazards are already communicated on the AgVet chemical label no GHS information is required.

AgVet chemicals are not required to have GHS pictograms on the label.

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- The <u>Code of Practice: Labelling of Workplace</u>
 <u>Hazardous Chemicals</u> provides guidance on
 which hazard and precautionary statements
 should be prioritised.
- More information
 - Information sheet for businesses using, handling or storing agricultural and veterinary (AgVet) chemicals
 - Policy statement: Changes to labelling for agricultural and veterinary (AgVet) chemicals

For more information see the Safe Work Australia website (www.swa.gov.au).