

1	2	(3)	4	5	(6)	(7)
MB 1	Clause No./ Subclause No./ Annex / Figure / Table	Line Number	Type of com men t	Comment (justification for change) by the MB	Proposed change by the MB	RTC observations on each comment submitted
LC			Ge	Standard is consistent with Saint Lucia's national standard requirements and recognises that the new regional standard represents updates.		Noted
LC	Foreword	6	Ed	Suggestion to reword.	Change " <i>Health, safety and the environment in the transportation, storage, handling, use and of pesticides, and</i> " to " <i>Health, safety and the environment in the transportation, storage, handling and use of pesticides, and</i> "	Accepted
TT	Foreword Page 5	line 6	ed	Health, safety and the environment in the transportation, storage, handling, use and packaging of pesticides	<b>Update wording.</b>	Accepted
TT	3.28		ed	"pesticide" has not been numbered and should be (the rest of the proceeding numbering will have to be adjusted accordingly)	<b>Update numbering.</b>	Accepted

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TT	3.28		te	<p>NOTE: The proposed definition of “pesticide” as presented in this draft standard, is so broad and open ended, so as to encompass things that are not toxins and should not be captured under this standard.</p> <p>The World Health Organisation states: “Pesticides are chemical compounds that are used to kill pests, including insects, rodents, fungi and unwanted plants (weeds). Pesticides are used in public health to kill vectors of disease, such as mosquitoes, and in agriculture, to kill pests that damage crops. By their nature, pesticides are potentially toxic to other organisms, including humans, and need to be used safely and disposed of properly”.</p> <p>By this definition, pesticides are toxins and</p> <p>The U.S. Environmental Protection Agency or EPA defines a toxic chemical as: any substance which may be harmful to the environment or hazardous to your health if inhaled, ingested or absorbed through the skin.”.</p> <p>All chemicals (including water, which is the most benign substance on Earth) can become toxic in the right quantities and conditions but this does not make water a toxic chemical. The toxicity of a product or material, must be based on the accepted LD50 system of classification and to qualify as a pesticide, the action of the material on the organism, must be poisonous.</p> <p>Therefore, if addressed logically, a pesticide should meet the following two basic criteria: A LD50/LC50 &lt; 5,000 (or to be determined). If it would not otherwise qualify as a toxic chemical/controlled product, it cannot then be classed as a pesticide, even if it has the ability to control pests in some way.</p> <p>Kills and controls pests by a means other than mechanical (e.g. physical trapping, electrical shock, heat/cold, desiccation, exclusion measures (nets/screens/sealers), physical deterrents (bird spikes, gummy/sticky materials), shooting/hunting (use of predators like dogs, ferrets or falcons) and psychological means such as optical/audible and natural olfactory deterrents (e.g. botanical oils, predator scents).</p>	<p><b>Proposed definition:</b> “pesticide” any product that is manufactured, represented, sold or used to destroy or mitigate pests by means of toxicity or infection, such as toxic chemicals &amp; compounds, inoculants of microbial agents (pathogens), hormones and sterilising agents, which could pose a danger to humans, non-target organisms and the environment and has an LD50/LC50 of &lt; 5,000 or conforms to a GHS Hazard Category classification of 1, 2, 3 or 4.</p>	<p>Not accepted</p> <ol style="list-style-type: none"> <li>1. The definition for pesticides are enshrined in the Pesticides Act of Member States. These are legal definitions. The legislation supersedes the standard. It is imperative that the definitions in the standard encompass that in the legislation.</li> <li>2. Not all pesticides are toxins and kill pests (that is, by toxicity or infection as in the proposed definition). There are pesticides which are repellents and not just toxic products. It is not accurate to state that all pesticides have to be just toxic chemicals and therefore the definition is not for toxic chemicals.</li> <li>3. The proposed definition can result in certain aspects of the standard becoming null and void should there be changes in any other aspects of the requirements, e.g. in the LD<sub>50</sub> or the GHS.</li> </ol>
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				<p>N.B. There is a good reason why “pesticides’ are regularly grouped with “toxic chemicals” and that’s because pesticides are a specific category of “TOXIC chemicals” and rightfully classified as “controlled products”. Why there is an attempt to expand the definition to include materials and things that can in no way be considered TOXIC chemicals as “pesticides”, is beyond me. While it is a laudable goal to ensure that there is oversight and regulations in place to control toxic materials that can potentially be harmful to human health and the natural environment, we should not allow ourselves to loose perspective and attempt to exert control where none is required or by definition, does not or should not fall under the purview of this standard. This standard is for the labelling of “toxic chemicals” vis-a-vis “pesticides”, nothing more.</p>		<p>4. The linkages between the product characteristics and the definition for a pesticide are not directly aligned.</p> <p>5. The current definition is all encompassing and allows for all types of pesticides while delimiting those products which are not.</p> <p>WHO definition - <i>Any substance, or mixture of substances, or microorganisms including viruses, intended for repelling, destroying or controlling any pest, including vectors of human or animal disease, nuisance pests, unwanted species of plants or animals causing harm during or otherwise interfering with the production, processing, storage, transport, or marketing of food, agricultural commodities, wood and wood products or animal feeding stuffs, or which may be administered to animals for the</i></p>
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						<i>control of insects, arachnids or other pests in or on their bodies. The term includes substances intended for use as insect or plant growth regulators; defoliants; desiccants; agents for setting, thinning or preventing the premature fall of fruit; and substances applied to crops either before or after harvest to protect the commodity from deterioration during storage and transport. The term also includes pesticide synergists and safeners, where they are integral to the satisfactory performance of the pesticide.</i>
TT	3.35		ed	“withholding period” is 3.35 not 3.34	<b>Update numbering.</b>	Accepted

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TT	Section 4.2 (p12) Requirements for Labelling		ge	Recommendation - I) The contact information for the manufacture or distributor should also be included in the event the company needs to be contacted	Inclusion of phone contact information for manufacturer or distributor.	Not accepted  1. Telephone numbers are subject to change and the added value for traceability may not be realized. Addresses are usually adequate. Also with websites and other media platforms there are further contact information. 2. The standard does not prevent its inclusion but it is not considered that it needs to be mandatory.

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TT	4.2.1	d.2	te	The statement refers to “grams per kg for <b>solids</b> ” then proceeds to address “viscous liquids, aerosols, or volatile liquids”. Please clarify why a unit of measurement for solids was applied to liquids and why “viscous liquids, aerosols, or volatile liquids” were not used as examples in 4.2.1.d.3.		<p>It is not necessary to define a solid or a liquid as these terms are commonly understood.</p> <p>The solid is the state of the active ingredient regardless of the final state of the product.</p> <p>Note the following expressions for active ingredients:</p> <ul style="list-style-type: none"> <li>• USEPA – percent by weight</li> <li>• EU – weight by weight for solids, liquids, dusts, mists and vapours and volume by volume for gases, only</li> <li>• Canada – percent by weight or weight by weight</li> <li>• FAO Code – as per the standard with the exclusion of volume by volume for gases.</li> </ul> <p>Volume by volume will be included for gases, only.</p>

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SR	4.2.1	d3	te	The concentration in liquids can also be in millilitres per litre	3) grams or millilitres per litre for other liquids; or	Partly accepted  Volume by volume is not a usual measure for other liquids. See response to comment above.
TT	4.2.1 i) NOTE		te	Formulation types include but are not limited to: emulsifiable concentrates, suspension concentrates, wettable powders and granules		Not accepted The use of the words “some” means that there are more types of formulations which have not been mentioned. This is inherent in the use of the word “Include”, in that, it is not limited to only the types mentioned of formulations . A change is not therefore necessary as the proposed change and the current wording are similar in meaning though the proposed change would include some level of redundancy.

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SR	4.2.1	l)	te	The address of the distributor should be mandatory for product tracing.	l) the name and physical address of the manufacturer <b>and</b> distributor, and shall be qualified by the appropriate wording; and	<p>Partly accepted. Reworded for clarity.</p> <p>It is understood that product tracing is important and especially where there may be a number of different distributors and this may mean that all distributors will need to be identified. However, this may result in the need for separate labels for each distributor. Also there are some cases where the product is registered by a third party who is neither the distributor nor the manufacture. The consumer will revert to the retailer from which the product is bought should there be an issue. Regulatory tracing will be facilitated by the registration process. The manufacturer information is obligatory. The distributor information is optional.</p> <p>The definitions provided for manufacturer and distributor helps to</p>
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						determine the label contact information.
TT	4.3.1 b) 1) - 10)		te	Precautionary statements for public health applications need to be included. NOTE: Due to the blaring absence of any mention of precautionary statements as would pertain to public health type applications, it would seem that the committee is focused on agricultural pesticides and has neglected public health/urban based pest management type products/systems/methods.		Accepted Changes made to the wording of the requirements to reflect public health applications. The GHS precautionary statements are universal in application. The ones appropriate for public health applications can be used.

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SR	4.3.1	b3	te	Personal protective equipment is usually given as pictograms	Remove point 3 and add a requirement in 4.4.1 for PPE pictograms.	Not accepted 1. The pictograms are not understood by everyone and the words are necessary. 2. Not all pictograms are clear as to the specificity of the PPE required. The pictograms provide basic information, for examples wear gloves, but it does not say what types of gloves. The wording will specify that it is chemical resistance gloves. 3. Also, necessary where special PPE may be required for which there are no pictograms.
SR	4.3.1	b4	ed	The safe use of the pesticide is already given in 4.3.1 b1, and thus not necessary	4) the safety precautions required for storage and transportation of the pesticide;	Accepted Note though that the subclauses are referring to two different types of activities. The important word at 4.3.1.b)1) is "in contact"
SR	4.3.1	b6	ed	Precautions are taken and not used	6) statement of any precautions <b>to be taken</b> to protect animals including birds, fish and bees or natural waters from contamination	Accepted Editorial change made

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SR	4.3.1	b8	te	Medical treatment should be performed by a physician who knows how to handle the case when other complications occur. It is thus advisable to rush to the nearest hospital while taking first aid measures	Remove “ medical treatment”  8) the directions for first aid;	Not accepted It is a common statement used on labels and help doctors with treatment – symptomatic treatment, antidote, or medical treatment. Leaving out medical treatment can prove to be quite risky in administration of medical care to an affected person
SR	4.3.1	b9	te	Antidotes should be prescribed by the physician. They are professionals in their field and know what to do when complications occur.	Point 9 should be left out/removed. The possibility for antidotes is given in the Material safety Data Sheet (MSDS), not on the label.	Not accepted A farmer will not have the Safety Data Sheet. This is a requirement for emergency response. The farmer will take the label for first responder to see. Some antidotes do not require a doctor to prescribe.

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SR	4.3.1	c4	te	The use of pesticides for multiple pest species is common. It is also common that the pesticide work at a range of the pest's life cycle. It is thus not necessary to mention the specific stage of the pest's life cycle.	4) directions on the method of application, the target plant or animal for which the pesticide is recommended and timing and frequency of application	Partly accepted The requirement is written in such a way as to refer to inclusion as the life cycle where relevant in some applications. The requirement has been reworded for clarity
SR	4.3.1	c7	te	In 4.3.1 b, statements are already given for pre-harvest and re-entry time. It is thus not necessary to mention it again here	Point 7 can be left out/removed	Accepted Editorial change made
SR	4.3.1	c8	te	In 4.3.1 b, statements are already given for pre-harvest and re-entry time. It is thus not necessary to mention it again here	Point 8 can be left out/removed	Accepted Editorial change made

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SR			ge	The “European Union. Regulation (EC) no 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures” has been amended in July 2015. Are those amendments taken into account?		<p>Noted</p> <p>The EC 1272/2008 has been amended numerous times since 2015 with the last amendment being in November 2020. These amendments are mostly based the GHS updates and recent specific scientific findings. This Directive covers a wider subject area than just labelling and therefore not all the updates pertain to labelling.</p> <p>The regional standard is based on the last version of the GHS, at the time of development, as is the EC Directive 1272/2008. In the regional standard the labelling is based on the acute toxicity as per the GHS. There may be areas where the EC Directive exceeds the requirements of the regional standard. Therefore, any product which is imported from the EU should meet the requirements of the regional standard.</p>
TT	4.4.2.C		ed	Shift NOTE to under Clause 5		The standard does not have a 4.4.2.C

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TT	4.5		ge	This clause requires consumer education and awareness since many products on the market may have the prohibited terms such as “safe” and “non-toxic” on their labels. If such products are on the market when this guideline becomes effective, are manufacturers and distributors required to recall the products?	No change proposed.	Noted  The question asked has to do with a regulatory function which is outside the ambit of this standard.
TT	Section 4.5.2 (pg. 15)		ge	Question - Why are the use of superlatives prohibited for pest control products?		Superlatives can be misleading to consumers especially where health and safety matters are concerned. There is usually no comparative data provided for other products or no means of making that comparison. (For example, if the superlative “the best or the safest” is used for a herbicide, how does the manufacturer prove that it actually is the best or safest against all other herbicides that may exist.  This is a general practice in the labelling of several and varied types of regulated products.

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TT	5.3.2	f and g	te	The descriptions of the red and yellow hazard colour bands are the same save the reference to Figure G.2 for the red band. There is no differentiation between each colour.	Suggest to further describe the red and yellow hazard colour bands to differentiate the meaning of the colours.	Partly accepted The colour bands are as denoted by the FAO and the GHS.  Additional information has been included at Annex A for clarification and differentiation in the use of the colour band.
TT	5.3.2	f to i	ed	The numbering appears incorrect – it started with “f” but it is assumed that it should start with “a”.	Suggest to address the numbering format and start with “a” instead of “f”.	Accepted The numbering has been corrected.
TT	Annex A	Cat. 1 and 2	te	The hazard statements for categories 1 and 2 are the same. There are no instructions for the reader to determine which category should be used.	Suggest to add a note on category selection/determination.	Partly accepted The colour bands are as denoted by the FAO and the GHS.  Additional information has been included at Annex A for clarification and differentiation in the use of the colour band.
TT	Annex C	C6, p. 31	ed	Refer to “Rinse continuously with water for at least minutes”. It appears that a blank space/area should be inserted between “least” and “minutes” to indicate a time period.	Suggest to insert a blank area between “least” and “minutes”.	Accepted The editorial change has been made.

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TT	Annex C	C6, p.31	te	<p>Please clarify the differences among the following statements:</p> <ol style="list-style-type: none"> <li>1. Gently wash with soap and water;</li> <li>2. Wash with soap and water; and,</li> <li>3. Rinse skin with water/shower.</li> </ol> <p>Items 1 and 2 appear to refer to one's hands but body part to be washed is not specified.</p>	<p>Suggest to distinguish items 1 and 2 identified in the comment.</p> <p>Suggest to provide examples of body parts to be washed/rinsed in the items provided in the comment.</p>	<p>Not accepted</p> <p>The statements are as in the GHS. They apply in different circumstances and the best choice is dependent on the manufacturer and the product formulation characteristics.</p>
TT	Annex G: sections G.1 and G.2 (pg. 37)			<p>Question - Why/how was the maximum number of precautionary pictograms selected? [Noting that Annex G is informative, not normative.]</p>		<p>The number of pictograms are based on the FAO Code of Conduct. The bee pictogram was added due to research that shows the decline in bee population due to pesticide use. They are standard pictograms used in the pesticide industry. It is informative because not all of the precautionary pictograms will apply at all times. The Annex shows the possibility of all the pictograms that may apply.</p>

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TT	Annex G.1		ge	Maximum permissible number of precautionary pictograms on a label is 15	<i>Reconsider the recommendation in Annex G</i>	Partly accepted The Annex has been revised to add clarity to the requirement for the placement of pictograms.  This number is quite acceptable and is in keeping with international norms.  No justification has been provided in the comment as to what entails reconsideration and why the numbers should be less or more (if this is what is being asked)

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TT			ge	Hazard Classification System: In the bottom half of Table A.1 (Hazard Statement), the LD50 range should be stated under each hazard statement for oral, dermal and inhalation.		Partly accepted Additional information has been included at Annex A. The colour bands are as denoted by the FAO and the GHS. The reference documents use the acute toxicity estimate (ATE) which is based on the LD <sub>50</sub> , and LC <sub>50</sub> but does not directly use the LD <sub>50</sub> .

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