EPA Perspectives on GHS

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Presenter biography

Kaitlin Keller works in the EPA Office of Pesticide Programs (OPP) Field and External Affairs Division where she assists with OPP's international activities and coordinates with other EPA offices and federal partners on pesticide issues. She has worked in federal food safety for the past eight years, primarily in OPP's Pesticide Reevaluation Division, coordinating the registration review of various pesticide active ingredients. She also spent a year at both the Food & Drug Administration (FDA) and USDA Food Safety & Inspection Service (FSIS) respectively. She holds a Master of Public Policy from the College of William & Mary and a Bachelor of Arts from Pennsylvania State University.

Presentation abstract

While there has been a global shift in recent years toward the Globally Harmonized System of Classification and Labeling (GHS), barriers to a universal hazard communication system remain. Following UN adoption of GHS in 2003, EPA's Office of Pesticide Programs (OPP) explored implementation of GHS for pesticides throughout the 2000's. However, to date, EPA's OPP has not adopted the GHS. In a March 2016 open letter to stakeholders, former OPP Office Director, Jack Housenger, detailed OPP's efforts to modernize the acute toxicity "six-pack" studies and reduce animal testing. This letter committed OPP to explore opportunities to reduce barriers to alternative methods to animal testing and facilitate the use of OECD *in vitro* methods, including consideration of GHS. In collaboration with other federal agencies, industry and non-governmental organizations, the Agency has made significant progress on the adoption of integrated approaches to testing and assessment (IATA) and the reduction of the use of animals in acute toxicity testing. As part of OPP's commitment to reduce animal use, in 2016, EPA completed a retrospective analysis of acute dermal toxicity studies and published a guidance document including a policy statement to waive all acute lethality dermal studies for formulated pesticide products. The Agency is currently conducting a pilot utilizing the GHS dose additive mixtures equation to reduce animal testing for product formulations. The goal of the pilot is to evaluate the utility and acceptability of the GHS dose additive mixtures equation as an alternative to animal oral and inhalation toxicity studies for pesticide product formulations. EPA is interested in expanding its use of OECD's test guidelines for *in vitro* (non-animal) studies for eye irritation, skin irritation, and skin sensitization. However, these OECD guidelines were developed and validated according to the GHS categories. Thus, EPA must develop cross-walks between the US and GHS category systems, which has been a resource intensive and time-consuming process. EPA continues to explore ways to remove the barriers to facilitating international harmonization, adoption of alternative test methods, utilizing faster, more effective, and better performing test methods while reducing the reliance on animal testing for pesticides. OPP is also committed to maintaining continuity with current programmatic efforts tied to its acute toxicity regulatory framework, such as the Worker Protection Standard (WPS), and School Integrated Pest Management (IPM) programs, and is pursuing a systematic process with stakeholder input that would balance these efforts while creating flexibility in OPP's acute toxicity classification system.