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IFIF GHS Working Group Recommendations

The following represent a set of basic principles recommended for consideration when feed associations/companies engage with authorities on local implementation of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS)*:

- It is recommended that countries' applicable industry associations participate in discussions before local GHS regulation is implemented to prevent unnecessary burden for the applicable industry.
- It is recommended that hazardous information for products classified as chemical hazards with regards to worker safety (as defined in the Purple Book) be pro-actively communicated to users in the supply chain via Safety Data Sheets (SDS) and labels when appropriate.
- Products that are not suitable to be directly fed to animals are mostly concentrated
 mixtures or pre-mixtures of various ingredients, some of which could be considered as
 hazardous to workers. The majority of these products can be classified as chemical hazards
 according to the Purple Book and; therefore, it is recommended that these products as a
 product category be included in local GHS implementation.
- It is recommended that feeds ready for direct animal consumption, and are to be consumed
 as is, be exempted from local GHS implementation. The reasons are two-fold. First, the
 focus of GHS is on the communication of hazards in the supply chain for worker safety.
 Secondly, a large proportion of feeds falling in this category may contain hazardous
 components that would be diluted to below threshold levels for a chemical hazard.
- It is recommended that the hazards of a premix communicated to the users in the supply chain shall be determined by the hazards of the individual components within the premix.
- It is recommended that generic SDSs, which cover a range of products with similar components and identical chemical hazards, be used when possible. The generic SDS shall reflect the hazards as defined by the actual composition of each product under the generic SDS.

- It is recommended that the global applicable industry associations work together to harmonize where possible the classification of individual chemical substances used within the feed/premix industry.
- It is recommended that businesses with activities in countries that do not have hazard communication standards take a pro-active approach by voluntarily implementing the hazard communication requirements in the Purple Book.

*Note: The term "local GHS implementation" utilized in this document is the translation of the U.N. Globally Harmonized System of Classification and Labelling i.e. Purple Book to local/country/state/legal area legislation.

**Note: The recommendations make a distinction between feeds suitable for direct animal consumption and products that are not, as they relate to GHS implementation. Typically, complete feeds, complementary feeds, ruminant mineral blocks, for example, are considered suitable for direct animal consumption. Premixes, concentrates, additives and all other products that require dilution (even if only with water or cereals) or further processing are considered not suitable for direct animal consumption.

Disclaimer: "These recommendations do not constitute a legal advice and should not be relied upon in making or refraining from making, any decision. Their mere purpose is to share good practices of the industry and offer ideas to consider. Please also note that laws vary significantly in different countries, so make sure to consult with applicable legislation while considering any of these recommendations'