AFRICAN BIOLOGICALS ALLIANCE

For Africa. By Africa.

REGISTRATION · SOUTH AFRICA · LABELS

Changing a label to GHS

The registrar wants hazard information in the Globally Harmonised System format. The guideline sets out seven documents to send. That is the GHS package, not the whole of a new registration.

7 documents in the GHS package	**0** colour bands, says the guideline
R0 GHS fee on a fast-tracked new registration	**1** approved label before you may sell on it

WHAT TO SUBMIT

The seven documents

The package

Send all seven together.

1. **Covering letter**
   Quote the B, K, L or M registration number.
2. **Service form**
3. **New label**
   Laid out like the registrar's example for your product type.
4. **Declaration**
   In the registrar's format, signed by the company representative.

The evidence

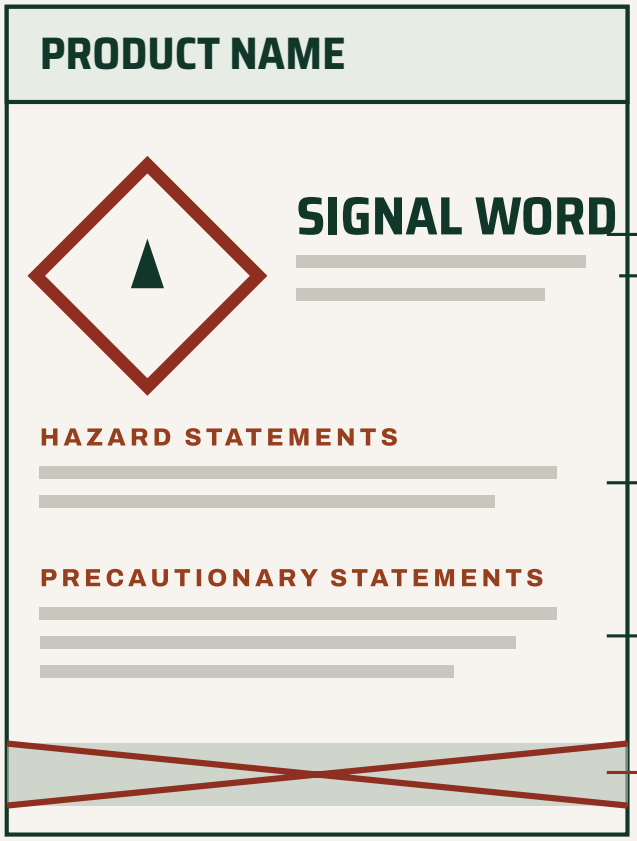
What backs the label.

5. **Safety data sheet**
   Must comply with section 14 of the 2021 hazardous chemical agents regulations.
6. **Proof of payment**
   Minor amendment tariff for an amendment. Amount not given in the guideline.
7. **Classification rationale**
   How the classification was reached. See below.

THE LABEL

What goes on it

Content stays the same as the approved label, except for the GHS changes.



English
clear and indelible. Other languages only if ide

Pictogram and signal word
as your classification requires

Hazard statements
words only, no printed codes

Precautionary statements
words only, no printed codes

No colour band
says the guideline, but see the check below

Labels must also come with an explanation of what the hazard statements, pictograms and signal words mean, and how to reduce exposure. A removable leaflet or a QR code will do (regulation 17(5)).

THE CLASSIFICATION RATIONALE

Six things it must show

01
Formulation
What is in the product.

02
Every component
Its own classification.

03
All hazard classes
Every class for which any ingredient is classified.

04
What you left out
Components too low to count for a class.

05
The evidence
Data, bridging principles or calculations.

06
The result
The classification that follows.

WHO ANSWERS FOR IT

The declaration, and what follows

The company declares

Signed by a company representative.

1. The label has not changed, apart from GHS.
2. A competent person compiled the GHS information from the latest UN Purple Book.
3. The safety data sheet complies with section 14 of the 2021 regulations.
4. The holder pays for an independent review if the classification is challenged.

If the classification is wrong

Regulation 15

- **A** The registrar may require an independent review, at the holder's cost.
- **B** If it finds the classification wrong, the registrar must require the label to be corrected.
- **C** The registrar may require product with the wrong label to be withdrawn.
- **D** No remedy may be sold without a label the registrar has approved.

WHAT IT COSTS

Which fee applies?

Confirm which transaction yours is before you pay.

Minor amendment tariff

Label amendment under the GHS guideline. The amount is not in the guideline, so check the current tariff.

No GHS fee

New registration under the fast-tracking protocol. The registration fee still applies.

A GHS label and full rationale are still required.

The relevant tariff

Label extension where the label has never been updated to GHS.

Send the full rationale.

Nothing more

You already applied to update the label to GHS.

Send a copy of the approved GHS label for reference.

WHERE IT IS UNCLEAR

Ask before you print

The guideline says	But
No colour band: it has been removed.	Example layouts in the annexure still show one on some product types.
Follow the example layout for your product type.	The examples are headed proposed and internal, and some text is unfinished.
The declaration says the label is unchanged from the approved one.	A wholly new product has no approved label. Ask how it applies.
It refers to draft regulations.	The final regulations of 25 August 2023 now apply: regulations 15 to 17.

Information, not legal advice. Facts as of 26 October 2026, from the Registrar's Guideline on the implementation of GHS classification and labelling (March 2022), the Regulations relating to agricultural remedies (25 August 2023, regulations 15 to 17) and the fast-tracking protocol (November 2023). Later changes to these documents are not reflected, including whether a colour band is required today and the current tariff amount. Guidelines page: https://www.nda.gov.za/index.php/publication/581-guidelines

Sources

Prepared by the African Biologicals Alliance from these documents. They belong to the department and remain subject to its own terms.

- Guideline on the implementation of the Globally Harmonised System of classification and labelling of chemicals classification. Issued by the Registrar of Act 36 of 1947, March 2022. https://www.nda.gov.za/index.php/publication/581-guidelines
- Regulations relating to agricultural remedies (regulations 15 to 17). Government Gazette 49189, 25 August 2023.
- Protocol for submission of applications for fast-tracking of registrations to replace agricultural remedies identified as substances of concern. Issued by the Registrar of Act 36 of 1947, November 2023. https://www.nda.gov.za/index.php/publication/581-guidelines

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