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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals

Eighth session, 7-9 December 2004
Item 3 (a) of the provisional agenda

DEVELOPMENT OF GUIDANCE FOR IMPLEMENTATION

Precautionary Statements (PS)

Transmitted by the Expert from The United States of America


A3.1 Preface

Paragraph 1, line 6, delete “the” and capitalize “Section”

Paragraph 3, line 4, delete “North American” (this was our mistake in earlier comments)

Paragraph 3, line 5, add “Pesticide” before “Label Review Manual”

A3.4 General Precautionary Measures

Paragraph 1, line 1, add “and mixtures” after “substances”

Paragraph 1, line 2-3, rephrase slightly to read: “To this end, the needs of and the information sources available to three groups or users or applicators should be taken into account:…..”

Paragraph 5, line 1, change “measures” to “statements”

A3.5 Structure of the Precautionary Statements Matrix

Paragraph 2, line 2, change “requirements” to “statements”

Paragraph 4, line 4, change “when considering” to “and consideration given to”

Paragraph 4, line 5, add “or mixture” after “substance”

(also, throughout for consistency, “e.g.” should be set off by commas)
Paragraph 6, line 1, change “different phrases” to “the recommended precautionary statements”

Paragraph 7, line 1, rephrase slightly to “When a substance or mixture is classified for a number of health hazards,….”

Paragraph 8, line 1-2, rephrase slightly to “…to include both precautionary pictograms and precautionary statements in order to convey information in more than one way…” and add at end of paragraph “While pictograms can be useful, they can be misinterpreted and are not a substitute for training.”