
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
Eleventh session, 12-14 July 2006
Item 3 (b) of the provisional agenda

HAZARD COMMUNICATION ISSUES

Codification of hazard and precautionary statements

Comments on ST/SG/AC.10/C.4/2006/8 and -/2006/8/Add.1

Transmitted by the expert from Canada

1. At the 10th session of the UN Sub-Committee of Experts on the GHS, the Sub-Committee agreed to establish a Correspondence Group to further develop a proposal for the codification of hazard and precautionary statements to facilitate their translation and contribute to harmonization.
2. Canada supports the work to codify hazard and precautionary statements for ease of reference and automation.
3. Concerning document ST/SG/AC.10/C.4/2006/8, Canada prefers retaining the use of the letter “P”.
4. Concerning document ST/SG/AC.10/C.4/2006/8/Add.1, Canada provides the following comments:
 - 4.1 Section 1 “Codification of hazard statements”:
 - 4.1.1 Recognizing that both the codification system proposed in the GHS and its use are not mandatory, the proposed A3.1.1.2 should be modified to read:

“This section contains an example of a coding system that can be assigned to hazard statements applicable to the hazard categories defined under the GHS.”
 - 4.1.2 The title in Table A3.1.1 should be modified to read "**Codes for physical hazard statements**"; Table A3.1.2 should be modified to "**Codes for health hazard statements**"; Table A3.1.3 should be modified to "**Codes for environmental hazard statements**";
 - 4.2 Section 2 “Codification of precautionary statements”:
 - 4.2.1 Recognizing that both the codification system proposed in the GHS and its use are not mandatory, the proposed A3.2.1.3 should be modified to read:

“This section contains an example of a coding system that can be assigned to the precautionary statements described in the GHS.”
 - 4.2.2 The title in A3.2.3 should be modified to read: “**Structure of the precautionary statement codification tables.**”

- 4.2.3 The existing paragraph A3.5.1 "Clear plain language..." should be inserted into this section.
- 4.2.4 Concerning A3.2.3.7 in the proposal, the second sentence "This may be conditions attaching to either the general use of a precautionary statement or its use for a particular hazard class and/or category." is confusing and should be deleted. In addition, it is proposed that the example provided in the existing A3.5.4 be included in this paragraph.
- 4.3 Section 3 "Use of precautionary statements":
- 4.3.1 In general, Canada notes that there are a number of changes to the precautionary statement text throughout the document. The benefit of these changes is not clear particularly given the cost and effort of the recent completion of translating the GHS into the six UN languages as well as other languages by individual countries.
- 4.3.2 The following sentence needs to be added to the proposed A3.3.4.1:
- "The actual codes should not appear on the label."
- 4.3.3 In the tables making up the **Matrix of precautionary statements by hazard class/category**, the codes should not be in bold print.
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