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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

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PROGRAMME OF WORK FOR THE BIENNIAUM 2007-2008

Proposal for further development of some hazard communication elements

Transmitted by the experts from DG ENTERPRISE and DG ENVIRONMENT of the European Commission

Introduction

The European Commission is currently in the process of preparing for the implementation of the GHS and has drafted a proposal for a regulation which would introduce the GHS criteria into Community law. The Commission Services have undertaken a public consultation on this draft proposal, have analysed the responses and adopted the draft proposal accordingly. It is the intention to have the Commission proposal adopted by end of this year.

Consideration

With regard to the use of hazard and precautionary statements and their codification we have based our drafting on the document ST/SG/AC.10/C.4/2006/9/Add.1, now revised by the document ST/SG/AC.10/C.4/2006/20/Add.1. We have used for example elements of the Annex 2 section 1 to communicate the application of pictograms, the Annex 2 section 2 to communicate the hazard statements and codes, the Table A2.3.1 of Annex 2 section 3 to introduce the application of precautionary statements and their codes and elements of the "precautionary statement codes" of A3.2 of Annex 3.

Currently we are gaining experience with the translation of the hazard and precautionary statements into 20 languages.

In this context we want to thank the correspondence group for their excellent work and effort with regard of further improving and simplifying these annexes related to hazard communication and to develop them towards tools that are helpful for regulatory purposes.

Nevertheless we have recognised that there might be still some room for further improvements and simplification to make the application of hazard and precautionary statements even more users friendly, e.g.:
• To consider the development of combined hazard statements to enable the use of one statement to describe not only the nature and degree of a hazard, but also when appropriate to communicate different route of exposure.

• To consider under the aspect of possible redundancy some of the precautionary statements again, and to question e.g. is a reader of precautionary statements able to distinguish between the messages as follows:
  o Immediately call a POISON CENTER or doctor/physician.
  o Call a POISON CENTER or doctor/physician.
  o Get medical advice/attention.
  o Get immediate medical advice/attention.
This work should be seen independent of the issue that precautionary statements are harmonised, but not yet standardised.

• In a second step to consider the development of combined precautionary statements to enable the description of recommended measures for different routes of exposure in one message when appropriate.

Proposal

It is proposed that these issues are considered for inclusion on the UNSECGHS Programme of Work for the next biennium.