HAZARD COMMUNICATION ISSUES

Symbol for the hazardous to the aquatic environment

Note by the secretariat

Introduction

1. The attention of the secretariat has been brought to some differences in the symbol applicable to substances and mixtures hazardous to the aquatic environment which appear in different parts of the GHS text. The differences concern mainly the fish and the line under the tree (e.g. fish with or without fins or variations on the thickness of the line under the tree).

2. Since the GHS symbol was created following the model of the existing symbol for the same hazard prescribed by Annex II of Directive 67/548/EEC\(^1\), the secretariat is of the opinion that the differences observed in the GHS for this symbol are not intended.

3. The “fish and tree” symbol will become mandatory for inland transport of dangerous goods (RID/ADR/ADN) as from January 2009 and maritime transport (IMDG Code) as from 2010.

4. International transport of dangerous goods often involves different transport modes and therefore it is important that all the applicable labels and placards are harmonized. Moreover, non-compliance with the label and placard models prescribed by these regulations may be subject to penalties.

---

Action requested of the Sub-Committee

5. In order to ensure that the same symbol is used across the different sectors implementing the GHS as well as within the same sector in all countries, and to avoid problems with its implementation, the Sub-Committee is invited to decide on the correct symbol to be reproduced in the third revised edition of the GHS.

6. Following the decision made by the Sub-Committee, corrigenda to the symbols introduced from the GHS into the relevant transport legal instruments or recommendations will be issued, when deemed appropriate.

7. Examples of the different symbols currently used in the GHS, as well as the original pictogram from Directive 67/548/EEC are reproduced hereafter.
| Original symbol  
(from Directive 67/548/EEC) | Chapter 1.4, par. 1.4.10.3  
Annex 3, tables for hazards to the aquatic environment  
(pages 391 and 393, English version) |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image" alt="Original symbol" /></td>
<td><img src="image" alt="Chapter 1.4, par. 1.4.10.3" /></td>
</tr>
</tbody>
</table>

| Chapter 4.1, decision logics 4.1.1 and 4.1.3) and  
Annex 2, tables A2.28 (a), and A2.28 (b)  
(pages 289 and 292, English version) | Annex 1, tables for aquatic toxicity  
(page 259 of the English version) |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image" alt="Chapter 4.1, decision logics" /></td>
<td><img src="image" alt="Annex 1, tables for aquatic toxicity" /></td>
</tr>
</tbody>
</table>

| Pictogram required by the forthcoming  
CLP Regulation (European Union) |  |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image" alt="Pictogram required by the forthcoming CLP Regulation" /></td>
<td></td>
</tr>
</tbody>
</table>