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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

#### Twenty-fourth session

Geneva, 12 – 14 December 2012

Item 2 (d) of the provisional agenda

#### Updating of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS):

#### Annexes

### Use of the forward slash “/” in precautionary statements

#### Transmitted by the expert from the United Kingdom on behalf of the informal correspondence group on Annexes 1-3 of the GHS<sup>1</sup>

#### Issue

1. The forward slash, “/”, is currently used in certain GHS precautionary statements. An explanation of the forward slash is given in paragraph A3.2.3.3 of Annex 3 of the GHS:

“When a backslash or diagonal mark [/] appears in a precautionary statement text in column (2), it indicates that a choice has to be made between the phrases they separate. In such cases the manufacturer or supplier can choose, or the competent authorities may prescribe the most appropriate phrase(s). For example in P280 “**Wear protective gloves/protective clothing/eye protection/face protection**” could read “**wear eye protection**”.

2. The use of the forward slash is appropriate in a number of the precautionary statements, where it is clear that the manufacturer/supplier or the competent authority must choose between a number of different words or phrases for inclusion on the label.

3. However the slash also appears in several precautionary statements where the slash does not indicate a choice between phrases. For example the statement P263 currently

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

reads, “**Avoid contact during pregnancy/while nursing**”. Here the manufacturer/supplier is not intended to choose between the phrases “during pregnancy” and “while nursing”. Rather, the intention of the statement is clearly to ensure that the user avoids contact both during pregnancy and while nursing, not just one or the other. Therefore, the intention seems to be that label should actually contain both phrases, so that the statement on the label reads “**Avoid contact during pregnancy/while nursing**”.

4. Another example is the statement P313 “**Get medical advice/attention**”. Clearly, the supplier is not intended to choose between the phrases ‘advice’ and ‘attention’. However it is doubtful here whether both words are needed, so this could be replaced by “**Get medical advice**”

5. A further issue is that the current guidance in A3.2.3.3 of the GHS (see above) does not make clear that where the slash is used to indicate a list of options, either one, or more than one of the options could be included on the label. For example, P280 “**Wear protective gloves/protective clothing/eye protection/face protection**” could read “**wear eye protection**” or it could read “**wear eye or face protection**”

## Proposal

6. To remove the inconsistency in use of the forward slash, some amendments to the affected precautionary statements are proposed. Specifically, it is proposed that where the slash in precautionary statements does not indicate a choice between phrases, the precautionary statement in question should be rephrased so the slash is not used.

7. For example, considering the two precautionary statements mentioned above, P263 (“**Avoid contact during pregnancy/while nursing**”) could be rephrased “**Avoid contact during pregnancy and while nursing**” and P313 (“**Get medical advice/attention**”) could be rephrased “**Get medical advice**”.

8. Some minor amendments are also proposed to A3.2.3.3 to clarify that where the slash indicates a choice between phrases, one or more phrases may be selected.

9. The proposals are set out in full in the Annex to this document.

## Additional information

10. Informal document INF.5 contains further explanation of each of the proposed changes regarding the forward slash together with excerpts from Annex 3, sections 2 and 3 that will be amended by the proposals.

11. Because the amendments to physical hazard precautionary statements set out in ST/SG/AC.10/C.4/2012/19 also make proposals to amend the GHS precautionary statements, a single set of excerpts from Annex 3 sections 2 and 3 are given, showing both the changes proposed in this document and those in ST/SG/AC.10/C.4/2012/19.

## Annex

### Proposals for amendments to the GHS

1. Amend paragraph A3.2.3.3 of the GHS as follows (deletions marked in ~~strike through~~, additions in **bold underline**):

“A3.2.3.3 When a ~~back~~**forward slash** or diagonal mark [/] appears in a precautionary statement text in column (2), it indicates that a choice has to be made between the phrases they separate. In such cases the manufacturer or supplier can choose, or the competent authorities may prescribe ~~the most~~ **one or more** appropriate phrase(s). For example in P280 “**Wear protective gloves/protective clothing/eye protection/face protection**” could read “**wear eye protection**” **or** “**wear eye and face protection**.”

2. Amend the following precautionary statements in Tables A3.2.2, A3.2.3 A3.2.4, and the tables in A3.3.5.1 as follows:

**P263**

Amend to read: “Avoid contact during pregnancy and while nursing.”

**P282**

Amend to read: “Wear cold insulating gloves and either face shield or eye protection.”

**P283**

Amend to read: “Wear fire resistant or flame retardant clothing.”

**P313**

Amend to read: “Get medical advice.”

**P315**

Amend to read: “Get immediate medical advice.”

**P407**

Amend to read: “Maintain air gap between stacks or pallets.”

**P411 and P413**

Amend condition for use to read: “... Manufacturer/supplier or the competent authority to specify temperature using applicable temperature scale.”

**P412**

Add a new condition for use to read: “... Manufacturer/supplier or the competent authority to specify/use applicable temperature scale.”

**P501**

Add condition for use to read: “manufacturer/supplier or the competent authority to specify whether disposal requirements apply to contents, container or both”

**P502**

Amend to read: “Refer to manufacturer or supplier for information on recovery or recycling.”