



**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****Thirtieth session**

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Item 4 (b) of the provisional agenda

Hazard communication issues:**Improvement of annexes 1 to 3 and further rationalization of precautionary statements****Amendment of precautionary statement P280 for hearing or
ear protection****Transmitted by the expert from Sweden¹**

1. When handling explosive substances, mixtures and articles it is often advisable to wear hearing protection, since an explosion is associated with a more or less loud bang. However, there is currently no precautionary statement that allows for giving this advice for explosives. The same advice may also be useful for other physical hazards such as desensitized explosives.
2. In fact, there is currently no precautionary statement available at all in the GHS that can be phrased so that users are informed that using hearing protection is advisable. P280, which currently reads “Wear protective gloves/protective clothing/eye protection/face protection.”, allows for advice on protection of other parts of the body, but not of the ears.
3. Since P280 is already prescribing protection of various body parts, and it is already applicable to both explosives and desensitized explosives as well as to many other physical hazards where hearing protection may be advisable, the expert from Sweden suggests amending P280 to incorporate this possibility.
4. After some research and consultation, the expert from Sweden has found that there appear to be two terms in use to refer to protection equipment against loud noise, namely “hearing protection” and “ear protection”. While it appears that it is the function of hearing

¹ In accordance with the programme of work of the Sub-Committee for 2015–2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15).

rather than the physical ear that needs to be protected, it is not clear to the expert from Sweden which term is the most appropriate or preferred. Therefore two options for amending P280 are put forward below.

5. If P280 is amended as suggested, wearing hearing (or ear) protection would then also become a possible advice for the few health hazards for which P280 can be used, but for which it not obviously would ever be applicable. However, since the slashes in the phrase indicate that a choice has to be made, it would still be possible to choose only the elements of the statement applicable to these health hazards, i.e, the wording of P280 applicable to health hazards for which hearing (or ear) protection is not advisable will remain unchanged.

6. Therefore, the expert from Sweden suggests that P280 is amended as indicated in either of the two options below.

Proposal

Option 1

7. In Table A3.2.1 of Annex 3, section 2 of the GHS, amend P280 to read as follows (*new proposed wording is shown in bold underlined text*):

“Wear protective gloves/protective clothing/eye protection/**hearing protection**/face protection.”

8. Additionally, make the consequential amendments in Annex 3, section 3 of the GHS wherever P280 is quoted.

Option 2

9. In Table A3.2.1 of Annex 3, section 2 of the GHS, amend P280 to read (new proposed wording is shown in bold underlined text):

“Wear protective gloves/protective clothing/eye protection/**ear protection**/face protection.”

10. Additionally, make the consequential amendments in Annex 3, section 3 of the GHS wherever P280 is quoted.
