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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****Thirty-first session**

Geneva, 5 – 8 July 2016

Item 4 (b) of the provisional agenda

**Hazard communication issues:****improvement of annexes 1 to 3 and further rationalization of precautionary statements****Proposed amendments to precautionary statement P280  
regarding hearing protection and other personal protective  
equipment****Transmitted by the expert from Sweden<sup>1</sup>****Background**

1. At the thirtieth session of the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals, held in December 2015, Sweden proposed in document (ST/SG/AC.10/C.4/2015/15) to amend precautionary statement P280 in order to allow for hearing or ear protection to be specified as an appropriate means of protection when handling especially some explosives.

2. During the discussions on this topic, several delegations as well as non-governmental organisations had opinions on, and suggestions for alterations to, the proposal from Sweden. Despite intense discussions over a coffee break, it was not possible to find a version of P280 that suited all at that point. Instead, the expert from Sweden invited all parties with opinions on the matter to make them-selves known to him, in order to try to resolve the issue over email correspondence with the aim of submitting a revised proposal to the thirty-first session of the GHS. This paper contains that revised proposal.

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<sup>1</sup> 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.4/56, annex III and ST/SG/AC.10/42, para. 15).

3. Experts from Belgium, Canada, Germany, the United Kingdom and the United States of America, as well as from the European Chemical Industry Council (CEFIC) and the Sporting Arms and Ammunition Manufacturers Institute (SAAMI), expressed interest to work together with the expert from Sweden in trying to find a solution, and discussions took place over email during December 2015 and January 2016.

4. It did not take very much effort or time before a version of P280 was arrived at that all those experts were content with. The version found to suit all was a combination of the original proposal from Sweden of adding “hearing protection” with the idea expressed by one expert during the discussions in the GHS to use “/...” in order to open up also for other possible personal protective equipment (see the report from the session, ST/SG/AC.10/C.4/60).

5. As a result of the proposed addition of “/...” to P280, it was felt during the email discussions that the conditions for use to P280 would need to be slightly modified in order to clarify that what is supposed to be filled in is the relevant personal protective equipment, and not something of a completely different nature.

## Proposal

6. In Table A3.2.2 of Annex 3, Section 2, of the GHS, amend the wording of P280 (Column 2 in the table) to read as follows (*new proposed wording is shown in bold underlined text*):

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

and in the same table amend the Conditions for use to P280 (Column 5 in the table) to read (*new proposed wording is shown in bold underlined text, text to be deleted is shown in bold strike-through text*):

“Manufacturer/supplier or the competent authority to specify the appropriate ~~type of~~ **personal protective** equipment.”

7. Additionally, make the consequential amendments in the GHS wherever P280 is quoted (e.g. in paragraph A3.2.3.3 of Section 2 of Annex 3, in paragraph A.3.3.4.2 in Section 3 of Annex 3 as well as throughout the tables in that section, and in Example 7 of Annex 7).

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