

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**

11 December 2015

Thirtieth session

Geneva, 9 – 11 December 2015

Item 4 (b) of the provisional agenda

Hazard communication issues

Improvement of annexes 1 to 3 and further rationalization of precautionary statements

Work on improvement of Annexes 1 to 3 and further rationalization of precautionary statements

Transmitted by the expert from the United Kingdom on behalf of the informal correspondence group

1. The Correspondence Group on Improving Annexes 1, 2 and 3 of the GHS met on 10 December 2015 and discussed two papers - INF.17 and a thought starter from the expert from Germany on the further rationalisation of the precautionary statements.
2. In considering INF.17 the Group discussed in particular Section 3.3.4 in Annex 1 to the paper on flexibility in the use of precautionary statements. The Group supported guidance on omitting precautionary statements triggered in the matrix where the advice is not relevant. As well as giving examples of where phrases can be omitted, the group decided to look at the feasibility of specifying in the matrix which precautionary statements were appropriate to products used by consumers or in workplaces.
3. The Group also discussed flexibility in terms of permissible variation of text from that in the GHS. The Group decided it would be preferable to set out permissible variations without reference to specific examples. The Group agreed that for hazard statements only regional variations in spellings were permissible.
4. In addition the Group discussed the precautionary statements referring to medical advice and medical attention and those regarding emergency response more generally. The Group supported the precedence approach in the paper and suggested this be combined with some simplification and rationalisation of the relevant existing statements and of their allocation to hazard categories and routes of exposure as appropriate.
5. The Group concluded its consideration of INF.17 by reviewing the table of general precautionary statements in para A3.3.3.4 of Section 3 of Annex 3. It was agreed that the purpose of this table was not clear and that the three precautionary statements listed for use on consumer products (P101, P102 and P103) should be included in the review work already agreed. In addition the value of P103, Read the label, was questioned.
6. A proposal from the expert from Germany to remove from the matrix combined precautionary statements comprising only the individual statements without change was welcomed. The matrix would be simplified by retaining in future only combination statements that amended the text of the individual statements to form the combinations. Use of combined statements generally would be further encouraged.

7. A proposal to combine in the presentation of the matrix hazard categories where the precautionary statements were the same was considered to be of lower priority. Nevertheless the expert from Germany undertook to provide examples and an indication of the extent of the likely benefits.
 8. More generally the Correspondence Group noted that a balance needed to be struck between the benefits of improved communication of safety information and the costs for industry and regulators of frequent change. In the longer term, as the GHS matures, the aim should be to reduce significantly the number of changes.
 9. The Correspondence Group will continue its work and will report back to the Subcommittee at the next session.
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