

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

9 December 2016

Thirty-second session

Geneva, 7-9 December 2016

Item 3 (b) of the provisional agenda

**Hazard communication issues: improvement of annexes 1 to 3
and further rationalisation of precautionary statements**

Proposed work plan for the correspondence group on the improvement of annexes 1-3 of the GHS

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

1. The correspondence group on improving annexes 1 to 3 of the GHS proposes the following plan of work for the biennium 2017-18.
2. The overall goal remains the improvement of annexes 1-3 and further rationalisation of precautionary statements. Within this there are three workstreams:
 - (a) Workstream 1: to develop proposals to rationalise and improve the comprehensibility of hazard and precautionary statements for users, while taking into account usability for labelling practitioners. This may include proposals to rationalise and clarify ambiguous or unhelpful instructional precautionary statements, such as statements relating to medical response and disposal.
 - (b) Workstream 2: to eliminate inconsistencies in the presentation of precautionary statements in Annex 3, including looking at disparities between the application of precautionary statements for different hazard classes/categories.
 - (c) Workstream 3: to consider and address other issues within the Correspondence Group's terms of reference as they arise.
3. The current list of tasks that the correspondence group proposes to tackle in the next biennium is in the Annex to this paper. These include task 8 added to the Group's work plan when the Sub-Committee considered flammable gases at its meeting on 7 December 2016, and tasks 9 and 10 which the group agreed to add to its workplan at its meeting on 8 December 2016. More tasks will be added in the course of the biennium as appropriate.
4. The Sub-committee is invited to agree the proposed plan of work.

Annex

<i>No.</i>	<i>Workstream</i>	<i>Topic</i>	<i>Issue</i>	<i>Proposed work</i>
1	1	<u>Medical response PS (P310-P315)</u>	The precise meaning of the medical response statements (P310-P315) is not clear and manufacturers/suppliers have encountered difficulties in choosing the appropriate wording from the two options. Translation of the PS and conditions for use has also resulted in discrepancies.	<ul style="list-style-type: none"> • Discuss why labels tend to appear with options still presented to the user and how this might be prevented. • Discuss whether the distinction between medical “advice” and medical ‘attention’ is needed. • Discuss the relative merits of distinguishing between “getting medical advice/attention” and “calling a POISON CENTER/doctor/...”.
2	1	<u>P501 – Waste disposal PS</u>	P501 tends to result in labels telling users to dispose of ‘contents/container to a waste disposal site in accordance with national regulation’. This places the burden on the user to find the appropriate disposal outlet and does not encourage recycling. The condition for use is also currently used as a continuation of the precautionary statement by manufacturers/suppliers and is inconsistent with other PS. P501 also appears on some workplace-only products where it is unnecessary.	<ul style="list-style-type: none"> • Look into the viability of instructing users to dispose of products at specific sites, including looking at varying disposal requirements within market areas, via a change to the PS and/or condition for use. • Consider limiting P501 use for the workplace when normal chemical waste disposal procedures suffice.
3	3	<u>Hand-eye contact</u>	At present the precautionary statements do not make a link between eye irritants and skin exposure, thereby overlooking the fact that hand-eye contact is a major source of eye contact with a substance/mixture.	<ul style="list-style-type: none"> • Consider adding “Eye irritation” to the P302, “IF ON SKIN”, triggers. • Consider creating new precautionary statement to highlight risk of hand-eye contact for eye irritants.
4	2	<u>Combination statements</u>	Combination statements are presented inconsistently in Annex 3. Some combination statements are shown in the tables while others are not. In the PS matrix the presentation of combination statements can be misleading, especially in routes of exposure + response whereby the route of exposure is presented as only applying to one response rather than multiple.	<ul style="list-style-type: none"> • Discuss the value of presenting combination statements in the PS tables and consider their removal. • Consider changing the presentation in the matrix to show that routes of exposure do not only apply to one response – possibly by avoiding putting multiple PS on the same line.
5	2	<u>Sensitisation - respiratory</u>	The PS for “Sensitisation – respiratory” does not include any reference to specific immediate treatment to alleviate symptoms, although these might be available.	Consider applying an extra PS for “Sensitisation – respiration”, perhaps using P271, “Specific treatment (see ... on this label)”.

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6	1	<u>P201 and P202</u>	P201, “Obtain special instructions before use”, and P201, “Do not handle until all safety precautions have been read and understood”, have similar meaning and are applied to very similar hazard classes/categories.	Consider merging P201 and P202 (without losing meaning) to create a new precautionary statement, e.g. “Do not handle until all safety precautions/special instructions have been understood”.
7	2	<u>Sub-categorisation</u>	A number of hazard classes provide sub-categories which can be adopted by competent authorities and by industry where the necessary data is available, e.g. “skin corrosion/irritation” categories 1, 1A, 1B and 1C. However, the presentation of the PS in sections 2 and 3 of Annex 3 does not always reflect this accurately.	Review and check that all possibilities are covered, e.g. by adding Category 1 to “Skin corrosion/irritation” categories 1A to 1C.
8	3	<u>Pictograms and notes in Annex 1</u>	Annex I has evolved over time and the use of pictograms and notes may not be consistent	Review the GHS and TDG pictograms and the use of notes in Annex I to ensure consistent and helpful presentation across hazard classes and categories.
9	3	<u>Precautionary pictogram</u>	How to reduce the number of incidents where young children come into contact with chemicals	Consider the development of a precautionary pictogram to convey the message keep out of reach children P102 for inclusion in Section 5 of Annex 3
10	2	<u>Combination of sections 2 and 3</u>	There is presently repetition in Sections 2 and 3 of Annex 3	Review the text before the tables in Section 2 and the matrix in Section 3 and consider whether it is appropriate to combine the sections so all the guidance on how to select and use precautionary statements is in one place.

