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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-fifth session**

Geneva, 4-6 July 2018

Item 4 (b) of the provisional agenda

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

Proposed changes to Annex 3 of the GHS to reflect hazard sub-categories

Transmitted by the expert from the United Kingdom on behalf of the informal working group on improving annexes 1, 2 and 3 of the GHS[[1]](#footnote-2)\*

Background

1. In line with its mandate for the 2017-2018 biennium[[2]](#footnote-3) the informal working group has taken forward work under its 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”.

2. This document presents the outcome of work on item 7 in the group’s workplan (informal document INF.12/Rev.1 (thirty-second session)) where the issue is: “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 precautionary statements in sections 2 and 3 of Annex 3 does not always reflect this accurately.’

3. In the course of doing this work the informal working group noted the need for a related change to Table 3.3.5 in Chapter 3.3. As this is outside the remit of the informal working group it is presented in a separate working document, “*Proposed change to Chapter 3.3 of the GHS to reflect hazard sub-categories”* (ST/SG/AC.10/C.4/2018/4). The Sub-committee may also wish to note that new precautionary statements concerning medical advice are addressed in a separate working document (ST/SG/SC.10/C.4/2018/13).

Outcome and proposal

4. The outcome of the work of the group on this topic is that there are only two hazard classes where the sub-categorisation is not accurately reflected in Annex 1 and in sections 1, 2 and 3 of Annex 3. These are:

(a) Skin corrosion/irritation, where the classification can be category 1 only where the available data is limited and sub-categories 1A, 1B or 1C cannot be assigned, or where required by the competent authority (3.2.2.1.1.2); and

(b) Serious eye damage/eye irritation, where the classification can be category 2 where the available data is not sufficient for further categorisation, or where the competent authority does not require categorisation into 2A or 2B (3.3.2.1.2.1).

Skin corrosion

5. To enable appropriate allocation of precautionary statements for skin corrosion category 1 as well as for sub-categories 1A, 1B and 1C, changes are needed to the hazard categories assigned to the following precautionary statements in section 2 of Annex 3: P260, P264, P280, P301, P303, P304, P305, P310, P321, P330, P331, P338, P340, P351, P353, P361, P363, P405 and P501, plus listed combinations including these statements.

6. In each case the change is simply to replace the existing entry ‘1A, 1B, 1C’ in column 4 of Tables A3.2.2, A3.2.3, A3.2.4 and A3.2.5 with ‘1, 1A, 1B, 1C’.

Serious eye damage / Eye irritation

7. To enable appropriate allocation of precautionary statements for serious eye damage/eye irritation as category 2 as well as for categories 2A and 2B, changes are needed to the hazard categories assigned to the following precautionary statements in section 2 of Annex 3: P264, P280, P305, P313, P337, P338 and P351, plus listed combinations including these statements.

8. In each case the change is simply to replace the existing entry ‘2A, 2B’ in column 4 of Tables A3.2.2 and A3.2.3, with ‘2/2A, 2B’ or with ‘2/2A’ as appropriate.

9. Conforming changes are needed in:

(a) Section 1 of Annex 3, Table A3.1.2, where

* for H314 ‘1A, 1B, 1C’ in column 4 of should be replaced with ‘1, 1A, 1B, 1C’; and
* for H319 ‘2A’ should be replaced by ‘2/2A’;

(b) Section 3 of Annex 3 where

* on the first page of the matrices for Skin corrosion/irritation, under Hazard category, ‘1A to 1C’ should be replaced by ‘1, 1A to 1C’; and
* on the second page of the matrices for Eye damage/irritation, under Hazard category, ‘2A’ should be replaced by ‘2/2A’.

10. In addition, it was noted that in the matrices of precautionary statements by hazard class / category in Section 3 of Annex 3, hazard category ‘1’ for the hazard classes germ cell mutagenicity, carcinogenicity and reproductive toxicity should read ‘1A, 1B’.

Action requested

11. The Sub-Committee is invited to agree the proposed changes to Annex 1 and sections 1, 2 and 3 in Annex 3 of the GHS as set out in paragraphs 4 to 10 above and as shown in informal document INF.7.

1. \* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, para. 98 and ST/SG/AC.10/44, para. 14). [↑](#footnote-ref-2)
2. Programme of work of the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals for 2017-2018 (refer to ST/SG/AC.10/C.4/64, annex III, paragraph 2). [↑](#footnote-ref-3)