



---

**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\*****Background**

1. In line with its mandate for the 2017-2018 biennium<sup>1</sup> 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.”

---

\* 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).

<sup>1</sup> 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).

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 Subcommittee 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.

---