



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 Transport of Dangerous Goods

Fifty-seventh session

Geneva, 30 November-8 December 2020

Item 11 (a) of the provisional agenda

**Issues relating to the Globally Harmonized System
of Classification and Labelling of Chemicals (GHS):
review of Chapter 2.1**

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals

Thirty-ninth session

Geneva, 9-11 December 2020...

Item 3 (b) of the provisional agenda

**Classification criteria and related hazard communication:
review of Chapter 2.1**

Allocation of precautionary statements for the new GHS Chapter 2.1 – amendments regarding P236

Transmitted by the expert from Sweden on behalf of the Informal Correspondence Group on the Review of Chapter 2.1*

Addendum

Introduction

1. In document ST/SG/AC.10/C.3/2020/23–ST/SG/AC.10/C.4/2020/8, the allocation of existing precautionary statements for explosives to adapt to the new GHS Chapter 2.1 as suggested in document ST/SG/AC.10/C.3/2020/20–ST/SG/AC.10/C.4/2020/5 is proposed. In that document, and in the status report on the work in document UN/SCETDG/57/INF.16 - UN/SCEGHS/39/INF.13, it is discussed how a new P statement, P236, is to be formulated and what the conditions for use should be. This issue was discussed during the informal online session of the Sub-Committee of Experts on the GHS (SCEGHS) in July 2020, and subsequently within the Informal Correspondence Group (ICG). This document presents the outcome of those discussions on P236 and amends the proposals made in document ST/SG/AC.10/C.3/2020/23–ST/SG/AC.10/C.4/2020/8.

2. As explained in document ST/SG/AC.10/C.3/2020/23–ST/SG/AC.10/C.4/2020/8, the point of P236 is to place information on the division for transport on the GHS label. The idea presented in ST/SG/AC.10/C.3/2020/23–ST/SG/AC.10/C.4/2020/8 was a new precautionary statement P236 worded “Division ... in the transport configuration”, and to indicate that it should be combined with existing P234 to form P234 + P236 “Keep only in original packaging; Division ... as configured for transport.”

3. Because the wording of P236 would not really be a precaution in itself, and because it cannot be guaranteed that it will always be combined with P234, all experts that spoke on

* 2020 (A/74/6 (Sect.20)) and Supplementary, Subprogramme 2.

this item in the online discussions in July 2020 preferred to include the text of P234 inside P236. The advantage of this is that P236 would then be formulated as a precaution and that it would always be combined with the text of P234, and hence this option presents a simpler way to achieve the desired outcome.

4. As a consequence of including the text of P234 inside P236, P234 should not be applied wherever P236 appears as that would obviously duplicate texts. This instruction should be as clear as it can be. After the online session in July 2020, one expert suggested to model it on a condition for use for precautionary statement P103, which is worded “Omit where P203 is used”.

5. The exemptions from applying P236 were also discussed during the online session in July 2020, and the two derogations from applying P236 as in UN/SCETDG/57/INF.16-UN/SCEGHS/39/INF.13 were accepted in principle. There was a preference for the second version of the derogation for explosives where the transport division is not known at the point of affixing the GHS label. However, that wording was further refined in discussions after the session.

Proposal

6. The annex to this document contains a proposal for a new P236, and the consequential amendment needed to the conditions for use for P234. The proposals in ST/SG/AC.10/C.3/2020/23–ST/SG/AC.10/C.4/2020/8 remain unchanged.

7. It is noted that consequential amendments will be needed regarding the matrices for precautionary statements in Annex 3 Section 3 of the GHS.

Annex

Amendments to Table A3.2.2 in Annex 3 of the GHS in addition to those presented in Annex II of document ST/SG/AC.10/C.3/2020/23–ST/SG/AC.10/C.4/2020/8

- Insert a row for a new precautionary statement P236, as follows:

Code (1)	Precautionary statement (2)	Hazard class (3)	Category (4)	Conditions for Use (5)
P236	Keep only in original packaging; Division ... in the transport configuration.	Explosives (chapter 2.1)	2A, 2B, 2C	<p>... Manufacturer/supplier or competent authority to specify the division for transport.</p> <p><i>May be omitted for single packaging where the transport pictogram displaying the division (within Class 1) appears.</i></p> <p><i>May be omitted where the use of different outer packaging results in different divisions for transport.</i></p>

- For precautionary statement P234, in the row for Explosives, add the following text to the Conditions for Use (column 5):

“Omit where P236 is used”