

## **Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals**

6 November 2020

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

#### **Thirty-ninth session**

Geneva, 9-11 December 2020

Item 8 of the provisional agenda

#### **Programme of work for the biennium 2021-2022**

## **Proposed work plan for 2021-2022 for the informal working group on the improvement of Annexes 1-3 of the GHS**

### **Transmitted by the expert from the United Kingdom on behalf of the working group**

1. The informal working group on improving Annexes 1 to 3 of the GHS proposes the following plan of work for the biennium 2021-2022.
2. The overall goal remains the improvement of Annexes 1-3 and further rationalisation of precautionary statements. Within this there are three key areas of focus:
  - (a) 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 disposal.
  - (b) 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) To consider and address other issues within the working group's terms of reference as they arise.
3. The working group has delivered on three items in its extensive work plan for 2019-2020 including: Proposed changes to presentation of flammable gas categories and subcategories in Annex 3<sup>1</sup>; Proposed changes to Annex 1<sup>2</sup>; and on corrections and amendments to Annex 3<sup>3</sup>. The group has also put forward formal proposals on the hand-eye contact issue for the consideration of the Sub-Committee at the thirty-ninth session<sup>4</sup>. In addition, in July 2019 the working group informed the Sub-Committee that following due

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<sup>1</sup> ST/SG/AC.10/C.4/2019/3 and ST/SG/AC.10/C.4/74

<sup>2</sup> ST/SG/AC.10/C.4/2019/12 and ST/SG/AC.10/C.4/76

<sup>3</sup> ST/SG/AC.10/C.4/2019/15 and ST/SG/AC.10/C.4/76

<sup>4</sup> ST/SG/AC.10/C.4/2020/12

consideration it no longer supported taking forward item 2 on the 2019-2020 work plan regarding the conditional use of P102 “Keep out of reach of children” precautionary pictograms and this was removed from the groups work plan<sup>5</sup>.

4. Although the informal working group has work hard towards completing its 2019-2020 work plan, some specific items of work (1-3) have been carried over to the next biennium, with two new tasks added to the work plan. More tasks will be added in the course of the biennium as appropriate, including any issues the Sub-Committee may allocate to the working group to take forward.

5. The current list of tasks that the informal working group proposes to tackle in the next biennium is in the Annex to this paper.

6. The Sub-Committee is invited to agree the proposed plan of work.

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<sup>5</sup> ST/SG/AC.10/C.4/74

## Annex

<i>No.</i>	<i>Topic</i>	<i>Issue</i>	<i>Proposed work</i>
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"> <li>• Look into the viability of instructing users to dispose of products at specific sites, including looking at varying disposal requirements for consumers and workers, via a change to the PS and/or condition for use.</li> <li>• Consider limiting application of P501 for the workplace when normal chemical waste disposal procedures suffice.</li> </ul>
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"> <li>• Discuss the value of presenting combination statements in the PS tables and consider their removal.</li> <li>• 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.</li> </ul>
3	<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.	<ul style="list-style-type: none"> <li>• Consider applying an extra PS for “Sensitisation – respiration”, perhaps using P271, “Specific treatment (see ... on this label)”.</li> </ul>
4	<u>Review of the use of slashes and dots in PSs</u>	Many PSs, such as P280, use slashes and dots to indicate that a manufacturers/supplier should choose the most relevant statement(s) from those provided in a specific PS for the listed hazard class or categories, though frequently the choice is not made and all the statements provided within the PS, including the slashes and the dots, appear on labels creating potential confusion and clutter through the use of irrelevant text.	<ul style="list-style-type: none"> <li>• Consider how PSs that contain slashes and dots could be revised to help reduce irrelevant text appearing on labels and confusion of those PSs;</li> </ul>
5	<u>Corrections &amp; amendments to PSs in Annex 3</u>	<p>The application of a number of PSs in relation to acute toxicity dermal hazard categories 3-5 are inconsistent and requires review.</p> <p>Improvements to P354 are necessary to provide clarity of the response required for the listed hazard classes under this PS.</p>	<ul style="list-style-type: none"> <li>• Consider whether amendments are necessary to ensure the correct application of various PSs to acute toxicity dermal hazard categories 3-5.</li> <li>• Consider what improvements could be made to P354 ‘Immediately rinse with water for several minutes’ to provide clarity for the listed hazard classes.</li> </ul>