



**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****Fortieth session**

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Item 2 (h) of the provisional agenda

**Work on the Globally Harmonized System (GHS):
improvement of annexes 1 to 3 and
further rationalization of precautionary statements****Amendments to sections 2 and 3 of Annex 3****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. In line with its mandate for the 2021-2022 biennium the informal working group has taken forward work under its focus area (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.”
2. This document presents the outcome of work under item 5 in the group’s workplan (informal document INF.21, thirty-ninth session) where the issue was to review Annex 3 to identify errors and inconsistencies in the precautionary statements and to consider where other potential improvements that could be made. Following the review, the group provided a separate document to the secretariat detailing the identified errors and the necessary corrections to Annex 3 of the GHS.

Acute toxicity, dermal, Category 3**Background**

3. The hazard class acute toxicity, dermal, Category 3, is considered to be of relatively high hazard and seriousness and as such normally receives the same precautionary statements as acute toxicity dermal categories 1 and 2.
4. However, a review of precautionary statements that apply to the acute toxicity dermal hazard class identified three precautionary statements that have acute toxicity dermal, Categories 1 and 2, allocated to them, but not acute toxicity, dermal Category 3. These precautionary statements are:

* A/75/6 (Sect.20), para. 20.51.

- (a) P262 **“Do not get in eyes, on skin, or on clothing.”**
- (b) P264 **“Wash hands [and...] thoroughly after handling.”**
- (c) P270 **“Do not eat, drink or smoke when using this product.”**

5. The informal working group considered that acute toxicity, dermal Category 3 should also be included under these precautionary statements.

Proposed amendments to Annex 3 (sections 2 and 3) for P262, P264 and P270

- 6. In Section 2, Table A.3.2.2, for P262, insert: “3” after: “1, 2” in column (4).
- 7. In Section 2, Table A.3.2.2, for P264, acute toxicity (dermal), insert: “3” after: “1, 2” in column (4).
- 8. In Section 2, Table A.3.2.2, for P270, acute toxicity (dermal): insert: “3” after: “1, 2” in column (4).
- 9. In Section 3, matrix for acute toxicity, dermal (chapter 3.1), hazard category 3, under “Prevention” insert the following:

“P262

Do not get in eyes, on skin, or on clothing.

P264

Wash hands [and ...] thoroughly after handling.

text in square brackets to be used when the manufacturer/supplier or competent authority specify other parts of the body to be washed after handling.

P270

Do not eat, drink or smoke when using this product.”.

Precautionary statement P354 “Immediately rinse with water for several minutes”

Background

10. P354 currently applies to skin corrosion (Categories 1, 1A, 1B, 1C) and serious eye damage (Category 1), and is normally only used in combination with other statements that such as: P302: “IF ON SKIN:” or P305: “IF IN EYES:”.

11. However, the P354 statement is not clear regarding the specific part of the body that should be rinsed and there were concerns regarding P354 when a substance or mixture is classified as both skin corrosion and serious eye damage, or where P354 was used in combination with other statements. For instance, for: P302 + P361 + P354 **“IF ON SKIN: Take off immediately all contaminated clothing. Immediately rinse with water for several minutes.”** it is not clear whether it is the contaminated clothing or the skin that should be rinsed.

12. The working group considered that to achieve greater clarity, it would be appropriate to add the word: “skin” in square brackets into the precautionary statement P354 to indicate that the word can be applied, but only in accordance with the specified the conditions for use that would detail when the skin is required to be rinsed. The proposed amended P354 statement would read as shown in paragraph 17 below.

13. In terms of the proposed conditions for use for the skin corrosion entry for P354, the group concluded that the inclusion of “skin” was not necessary for inclusion in the individual statement and was only appropriate to be used for the combination statement: P302 + P361 + P354 which would read: **“IF ON SKIN: Take off immediately all contaminated clothing. Immediately rinse skin with water for several minutes.”**. The proposed conditions for use for the skin corrosion entry are shown in paragraph 17 below.

14. The proposed conditions for use for the serious eye damage hazard class entry for P354 are shown in paragraph 17 below.

15. Using the proposed conditions for use means that “skin” would be added to P354 only for the combination P302+P361+P354 and would make it clear that it is the skin, not contaminated clothing, that is to be rinsed.

16. It also means that for the combined statement: P305+P354+P338 **“IF IN EYES: Immediately rinse with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.”** the labelling practitioner would not use the text in square brackets for P354. Furthermore, given that leading statement for P305+P354+P338 is: **“IF IN EYES:”** which clearly indicates that it is the eyes that would need to be rinsed and as this statement immediately precedes P354, inclusion of “skin” in P354 in this case would not be needed and if it was could create ambiguity, regardless of whether the substance or mixture was classified as either or both skin corrosive and serious eye damage.

Proposed amendments to Annex 3 (sections 2 and 3) for P354

17. In Section 2, Table A.3.2.3, for P354:

Column (2): amend the statement to read as follows:

“Immediately rinse [skin] with water for several minutes”

Column (5):

- For the skin corrosion hazard class entry, insert:

“- text in square brackets to be used only for the combination P302 + P361 + P354”

- For the serious eye damage hazard class entry, insert:

“- use only “Immediately rinse with water for several minutes”. Text in square brackets should not be used.”

18. In Section 2, Table A.3.2.3, for P302 + P361 + P354, column (2), amend the statement to read as follows:

“IF ON SKIN: Take off immediately all contaminated clothing. Immediately rinse skin with water for several minutes.”

19. In Section 3, matrix for skin corrosion/irritation (chapter 3.2), hazard category 1, 1A, 1B, 1C, under “Response”, amend P302 + P361 + P354 to read as follows:

“P302 + P361 + P354

IF ON SKIN: Take off immediately all contaminated clothing. Immediately rinse skin with water for several minutes.”

Matrix tables for flammability of gases

Presentation of notes beneath the matrix tables for pyrophoric gases and chemically unstable gases A and B

20. The working group identified that the presentation of the notes in the GHS matrix tables for 1A pyrophoric gases and chemically unstable gases A and B are slightly ambiguous.

21. Matrix tables include everything on the page for a particular hazard class and category, including precautionary statements, hazard statements, symbols and signal words. However, the notes under the 1A pyrophoric gases and chemically unstable gases A and B matrix tables refer only to the precautionary statement component of the table rather than the whole matrix table.

22. Following consideration the group considered that for greater clarity it would be appropriate to insert an superscripted “a” after the words: “Precautionary statement” in the

heading of the precautionary statement table within these matrix tables, with a corresponding “a” to replace the word “Note:” beneath the tables for these hazard classes. Furthermore, the group considered that the word: “Note:” at the beginning of the table note was superfluous. This would also be more consistent with the presentation of notes in the tables of Annex 1.

23. In addition, the group also considered that the readability and clarity of notes beneath the 1A pyrophoric gases and chemically unstable gases A and B tables could be further improved and propose that they are replaced with the notes as shown in paragraphs 26 (for 1A pyrophoric gases) and 27 (for 1A, chemically unstable gases A and B) below.

Matrix table for the flammable gases hazard class, category 1A, 1B, and 2

24. The working group also identified there was another inconsistency between the matrix table for flammable gases category 1A, 1B and 2 with the tables for pyrophoric gases and chemically unstable gases A and B. As mentioned above, each of these hazard categories has a note under their respective tables and the group considered that for consistency there should be a similar note inserted under the matrix table for flammable gases 1A, 1B and 2. The proposed new note (as provided in paragraph 25 below) would be linked via a superscript to the heading of the precautionary statement table in the matrix table.

Proposed amendments to Annex 3, section 3, matrix table notes for flammable gases

25. Matrix for flammable gases (chapter 2.2) hazard categories 1A, 1B, 2, in the heading for the “Precautionary statements” table, after the word “statements” insert a superscripted “a” and insert the following new note beneath the table:

“^a *This table lists only the precautionary statements that are assigned due to the flammability of the gas. For the other precautionary statements that are assigned based on 1A flammability and either the pyrophoricity or the chemical instability of the gas, see the respective tables for pyrophoric gases or chemically unstable gases A and B.*”

26. Matrix for flammable gases (chapter 2.2) (pyrophoric gases) hazard category 1A, pyrophoric gas, in the heading for the “Precautionary statements” table, after the word “..statements” insert a superscripted “a”.

Replace the note beneath the table with the following (*new text is shown in bold*):

“^a *This table lists only **the** precautionary statements that are assigned due to the flammability and the pyrophoricity of the gas. For **the** other precautionary statements that are assigned based on **the flammability and the** chemical instability **of the gas**, see the respective table for chemically unstable gases A and B.*”

27. Matrix for the flammable gases (chapter 2.2) (chemically unstable gases) hazard category 1A, unstable gas A and hazard category 1A, unstable gas B, in the heading for the “Precautionary statements” table, after the word “..statements” insert a superscripted “a”.

Replace the note beneath the table with the following (*new text is shown in bold*):

“^a *This table lists only the precautionary statements that **are** assigned due to the flammability and the chemical instability of the gas. For the other precautionary statements that are assigned based on **the flammability and the** pyrophoricity of the gas, see the respective table for pyrophoric **gases.**”*

Respiratory and skin sensitization

28. During the review of Annex 3 the group noted that there was inconsistency between the presentation of respiratory sensitization or skin sensitization hazard classes in Chapter 3.4 and the tables in Annex 3.

29. To ensure consistency with the presentation of these hazard classes in Chapter 3.4 and the tables in Section 2 of Annex 3, it is proposed to amend the hazard class entries for respiratory or skin sensitization in Table A3.1.2, column (3) as shown in paragraphs 31 and 32 below.

30. In addition, the group considered that the Section 3 matrix table headings for respiratory sensitization and skin sensitization should also be amended to ensure consistency with the presentation provided in Chapter 3.4 and the tables in Section 2 of Annex 3 for these hazard classes. Hence, the group propose to amend the matrix table headings as shown in paragraphs 33 and 34 below.

Proposed amendments to Annex 3 for respiratory and skin sensitization

31. Section 1, Table A.3.1.2, for H317, column (3): replace “Sensitization, skin (chapter 3.4)” with “Skin sensitization (chapter 3.4)”

32. Section 1, Table A.3.1.2, for H334, column (3): replace “Sensitization, respiratory (chapter 3.4)” with “Respiratory sensitization (chapter 3.4)”

33. In Section 3, table for “Sensitization – respiratory (Chapter 3.4)”, replace the heading with “RESPIRATORY SENSITIZATION (CHAPTER 3.4)”

34. In Section 3, table for “Sensitization – skin (Chapter 3.4)”, replace the heading with “SKIN SENSITIZATION (CHAPTER 3.4)”

Action requested

35. The Sub-Committee is invited to agree the proposed amendments to sections 2 and 3 of Annex 3 of the GHS as detailed in this document. The proposals are provided in the following paragraphs:

- Proposed amendments to P232, P264 and P270; see paragraphs 6 to 9;
 - Proposed amendments to P354; see in paragraphs 17 to 19;
 - Proposed amendments to flammable gases matrix tables; see in paragraphs 25 to 27;
 - Proposed amendments to respiratory and skin sensitization entries in Annex 3; see paragraphs 31 to 34.
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