

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**

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Item 3 (h) of the provisional agenda

**Work on the Globally Harmonized System of Classification and
Labelling of Chemicals: Improvement of annexes 1 to 3 and
further rationalization of precautionary statements**

Proposed work plan for 2023-2024 for the informal working group on the improvement of annexes 1 to 3 of the GHS

Transmitted by the expert from the United Kingdom on behalf of the informal 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 2023-2024.
2. The overall goal remains the improvement of annexes 1 to 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 one item in its extensive work plan for 2021-2022: "Combination statement amendments to sections 1, 2 and 3 of Annex 3"¹. The group has also put forward formal proposals on the respiratory sensitiser issues for the consideration of the Sub-Committee at the forty-third session².
4. Although the informal working group has work hard towards completing its 2021-2022 work plan, some specific items of work (1 and 2) have been amended slightly and carried over to the next biennium. 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.

¹ ST/SG/AC.10/C.4/2022/5 and ST/SG/AC.10/C.4/84

² ST/SG/AC.10/C.4/2022/16 and INF.4

5. Further, the group agreed not to take forward a previous work item on reviewing P501 (a waste disposal precautionary statement) for the groups draft workplan for the 2023-2024 biennium. Although this item had been listed on the groups workplans for several bienniums, no sponsor had been identified to lead on taking this work forward and consequently the group did not consider it a priority for the group to include in its draft workplan for the 2023-2024 biennium.
6. The current list of tasks that the informal working group proposes to tackle in the next biennium is in the annex to this paper.
7. The Sub-Committee is invited to agree the proposed plan of work.

Annex

<i>No.</i>	<i>Topic</i>	<i>Issue</i>	<i>Proposed work</i>
1	Review of the use of slashes, dots and brackets within precautionary statements	<ul style="list-style-type: none"> • Many precautionary statements, 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 precautionary statement for the listed hazard class or categories, though frequently the choice is not made and all the statements provided within the precautionary statement, including the slashes and the dots, appear on labels creating potential confusion and clutter through the use of irrelevant text. • Some precautionary statements contain text within brackets (i.e. “()” or “[]”) but the inclusion of such punctuation on labels may not always necessary and can create potential confusion. 	<ul style="list-style-type: none"> • Consider how precautionary statements that contain slashes, dots and brackets could be revised to help: <ul style="list-style-type: none"> ○ to improve the clarity and meaning of those precautionary statements; ○ reduce irrelevant text appearing on labels and confusion of those precautionary statements;
2	Corrections and amendments to precautionary statements in Annex 3	<ul style="list-style-type: none"> • The application of a number of precautionary statements in relation to acute toxicity hazard categories are inconsistent and requires review. • The skin corrosion combination response precautionary statement (P302 + P361 + P354) does not indicate which response should be taken first and may not provide accurate information about how long skin needs to be rinsed. Further, the combination response precautionary statement may not clearly indicate that the skin needs to be rinsed. 	<ul style="list-style-type: none"> • Consider whether amendments are necessary to ensure the correct application of various precautionary statements to acute toxicity hazard categories within Annex 3. • Consider whether revisions are necessary to P302 + P361 + P354 for skin corrosion (“IF ON SKIN: Take off immediately all contaminated clothing. Immediately rinse with water for several minutes.”) to ensure the proper order of response and that skin is rinsed for sufficient time. In addition, consider whether clarity is required for the combination response precautionary statement to ensure it clearly communicates that the skin needs to be rinsed.