

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

Comments on ST/SG/AC.10/C.4/2022/16

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

Introduction

1. This informal document addresses two changes that were overlooked during the preparation of document ST/SG/AC.10/C.4/2022/16 and informal document INF.4. These changes are required to ensure that the proposals are consistent with those that had been previously agreed by the informal working group.
2. Paragraph 3 of this document address the required changes to the explanatory text in paragraph 8(e)(ii)e and the proposed text for A3.2.4.4 in document ST/SG/AC.10/C.4/2022/16. Where applicable, new text is shown in **bold black** and underlined, and deleted text (from that proposed in ST/SG/AC.10/C.4/2022/16 and INF.4) is shown in underlined **black strikethrough**.

Clarification regarding the explanatory text in sub-paragraph 8 (e) (ii) e

3. The word “generally” was inadvertently omitted in sub-paragraph 8 (e) (ii) e. The Sub-Committee is invited to note that the sub-paragraph, as agreed by the informal working group, should read:

“e. If, in accordance with the safety information provided, the ventilation type is considered adequate, then **generally** respiratory protective equipment does not need to be worn. However, the manufacturer/supplier must specify if both ventilation and respiratory protection are needed”.

Amendment to A3.2.4.4 in ST/SG/AC.10/C.4/2022/16

4. In the proposed text for A3.2.4.4, in the second to last sentence, delete “with the chemical” after “If additional information is provided”.
5. The text agreed by the informal working group (including the change above) is provided below:

“A3.2.4.4 Where square brackets [...] appear around some text in a precautionary statement, this indicates that the text in square brackets is not appropriate in every case and should be used only in certain circumstances. In these cases, conditions for use explaining when the text should be used are given in column (5) of the tables. For example, P264 states: **“Wash hands [and ...] thoroughly after handling.”** This statement is given with the condition for use: *“- text in square brackets to be used when the manufacturer/supplier or the competent authority specify other parts of the body to be washed after handling.”*. The application of the condition for use should be interpreted as follows: If additional information is provided ~~with the chemical~~ explaining what other part(s) of the body is to be washed following handling, then the text in brackets is to be used followed by the name of the relevant body part(s). However, if other part(s) of the body do not need to be specified, the text in square brackets should not be used, and the precautionary statement should read: **“Wash hands thoroughly after handling.”**”

Action and next steps

6. The Sub-Committee is invited to take note of the clarification provided in paragraph 3 above and to adopt the additional amendment to A3.2.4.4 as indicated in paragraph 4 of this document when considering the proposals in ST/SG/AC.10/C.4/2022/16, and consolidated in INF.4.
