

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 2 (i) 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**

Precautionary statement issues related to hazard category 5 for the acute toxicity hazard classes

**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**

I. Background

1. In line with its mandate for the 2023-2024 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. The informal working group has undertaken work under item 2 in the group’s workplan for the 2023-2024 biennium¹ to review the precautionary statements in the tables of annex 3 in relation to acute toxicity hazard categories and identify where improvements could be made. The informal working group has agreed on a number of proposed changes and intends to present these to the Sub-Committee for the consideration at the December 2023 session.
3. The informal working group also identified a number of potential issues in relation to acute toxicity hazard Category 5, as detailed in paragraphs 4 to 14 below. The group is seeking advice about those potential issues from the Sub-Committee, particularly from those delegations that are not members of the group but who implement acute toxicity Category 5 in their jurisdictions.

II. Discussion

4. Currently, acute toxicity Category 5 is listed beneath the following precautionary statements in Section 2, Annex 3, of the GHS:

Code	Precautionary statement	Hazard class	Hazard category
P301	IF SWALLOWED:	Acute toxicity, oral (chapter 3.1)	1, 2, 3, 4, 5
P302	IF ON SKIN:	Acute toxicity, dermal (chapter 3.1)	1, 2, 3, 4, 5
P304	IF INHALED:	Acute toxicity, inhalation (chapter 3.1)	1, 2, 3, 4, 5
P317	Get medical help.	Acute toxicity, oral (chapter 3.1)	4, 5
		Acute toxicity, dermal (chapter 3.1)	4, 5
		Acute toxicity, inhalation (chapter 3.1)	4, 5

¹ See informal document INF.17, forty-third session.

Code	Precautionary statement	Hazard class	Hazard category
P301 + P317	IF SWALLOWED: Get medical help.	Acute toxicity, oral (chapter 3.1)	4, 5
P302 + P317	IF ON SKIN: Get medical help.	Acute toxicity, dermal (chapter 3.1)	5
P304 + P317	IF INHALED: Get medical help.	Acute toxicity, inhalation (chapter 3.1)	5

5. Acute toxicity, oral, dermal and inhalation, categories 4 and 5 are all considered to present varying degrees of hazards, but are all considered to be of low seriousness and high urgency for obtaining medical treatment and as such normally receive similar precautionary statements ².

6. The review identified a number of preventative, response and disposal precautionary statements to which acute toxicity, oral, dermal and inhalation, Category 4 has been allocated, but not acute toxicity Category 5 for these hazard classes. These precautionary statements are as follows:

Code	Precautionary statement	Hazard class	Hazard category
P261	Avoid breathing dust/fume/gas/mist/vapours/spray.	Acute toxicity, inhalation (chapter 3.1)	3, 4
P264	Wash hands [and ...] thoroughly after handling.	Acute toxicity, oral (chapter 3.1)	1, 2, 3, 4
P270	Do not eat, drink or smoke when using this product.	Acute toxicity, oral (chapter 3.1)	1, 2, 3, 4
P271	Use only outdoors or with adequate ventilation.	Acute toxicity, inhalation (chapter 3.1)	1, 2, 3, 4
P280	Wear protective gloves/protective clothing/eye protection/face protection/hearing protection/...	Acute toxicity, dermal (chapter 3.1)	1, 2, 3, 4
P321	Specific treatment (see ... on this label).	Acute toxicity, dermal (chapter 3.1)	1, 2, 3, 4
P330	Rinse mouth.	Acute toxicity, oral (chapter 3.1)	1, 2, 3, 4
P340	Remove person to fresh air and keep comfortable for breathing.	Acute toxicity, inhalation (chapter 3.1)	1, 2, 3, 4
P352	Wash with plenty of water/...	Acute toxicity, dermal (chapter 3.1)	1, 2, 3, 4
P362	Take off contaminated clothing.	Acute toxicity, dermal (chapter 3.1)	4
P364	And wash it before reuse.	Acute toxicity, dermal (chapter 3.1)	1, 2, 3, 4
P302 + P352	IF ON SKIN: Wash with plenty of water/...	Acute toxicity, dermal (chapter 3.1)	1, 2, 3, 4
P304 + P340	IF INHALED: Remove person to fresh air and keep comfortable for breathing.	Acute toxicity, inhalation (chapter 3.1)	1, 2, 3, 4
P362 + P364	Take off contaminated clothing and wash it before reuse.	Acute toxicity, dermal (chapter 3.1)	4
P501	Dispose of contents/container to ...	Acute toxicity, oral (chapter 3.1)	1, 2, 3, 4
		Acute toxicity, dermal (chapter 3.1)	1, 2, 3, 4

² See figure 1 in document ST/SG/AC.10/2018/30, thirty-sixth session.

7. The purpose of this paper is to try to ascertain, particularly from those delegations from jurisdictions that do implement acute toxicity Category 5, if they have had any significant issues that have resulted from having fewer precautionary statements available for this hazard class and category. This paper will also try to ascertain if those delegations have positions on whether these issues need to be addressed in Annex 3 and how. For example, under which (if any) precautionary statements should Category 5 be placed? Should Category 5 be placed under all or some of those precautionary statements that currently have acute toxicity Category 4 listed beneath them?

8. The group also noted that since many jurisdictions do not implement acute toxicity Category 5 they would not be directly impacted through any potential new placement of this category under additional precautionary statements in the GHS. However, those in their industry who export to jurisdictions that do implement acute toxicity Category 5 could be affected by any such changes.

9. In addition, the group noted that the response combination precautionary statements for both acute toxicity dermal and inhalation Category 5 may require further consideration. Respectively these are:

P304+P317 “IF INHALED: Get medical help.”

P302+ P317 “IF ON SKIN: Get medical help.”

10. Currently, the only response precautionary statement for someone who has inhaled a chemical classified as acute toxicity inhalation Category 5 is to “Get medical help”.

11. However, a question has been raised regarding what the initial action should be to help a person exposed to a chemical classified as acute toxicity inhalation Category 5: Should medical help be sought for them or should they first be removed to fresh/clean air (and then get medical help)? If the latter is the case then perhaps this hazard class and category should be placed under P340, and the combination statement changed to: P304+P340 (“**IF INHALED: Remove person to fresh air and keep comfortable for breathing.**”) from the current statement: P304+P317 (“**IF INHALED: Get medical help.**”).

12. Similarly, what should the initial action be to help a person exposed to a chemical classified as acute toxicity dermal Category 5 – should medical help be sought for them or, if it is on the skin, should it first be washed off with plenty of water (and then get medical help)? If the latter is the case then consideration is needed regarding potentially placing this hazard class and category under P352, together with a change to the combination statement to: P302+P352 (“**IF ON SKIN: Wash with plenty of water/...**”) rather than the current statement: P302+P317 (“**IF ON SKIN: Get medical help.**”).

13. In addition, unlike acute toxicity dermal Category 4, neither P362 (“**Take off contaminated clothing.**”) or P364 (“**And wash it before reuse.**”) are applied to acute toxicity dermal Category 5. Therefore, if a chemical with this classification of Category 5 also contaminates clothing, then there is currently no precautionary statement instruction to either remove or wash such clothing before it is reused. Hence, the precautionary statements do not guard against contaminated clothing continuing to be worn by a user, though for workers there may be on-site rules to prevent such occurrences. Thus, consideration is also required regarding potentially placing this hazard class and category under P362 and P364, together with the combination: P362+P364 (“**Take off contaminated clothing and wash it before reuse.**”).

14. The Sub-Committee may also like to note that some (though not all) of the groups draft proposals on acute toxicity precautionary statements that are intended to be submitted for consideration at the December session may also be of interest when considering the Category 5 issues presented in this paper. Thus, the group has

provided these proposals below for informational purposes. The group considers that the following draft proposals would each provide stronger preventative messaging on labels to help improve the protection to the user, these include:

- (a) To move acute toxicity, inhalation Category 3 from P261 and place it under P260 (“**Do not breathe dust/fume/gas/mist/vapours/spray.**”);
- (b) To move acute toxicity, inhalation Category 3 from P321 to and place it under P320 (“**Specific treatment is urgent (see ... on this label).**”) alongside categories 1 and 2 of this hazard class;
- (c) To move acute toxicity, oral and dermal categories 1, 2 and 3 from P321 to under P320;
- (d) To add acute toxicity, oral and inhalation Category 4 to under P321.

III. Action requested

15. The Sub-Committee is invited to consider the acute toxicity Category 5 issues and provide views on the potential inclusion of acute toxicity Category 5 under the various precautionary statements alongside the respective acute toxicity Category 4 listings (as detailed in the table under paragraph 7 above).

16. The Sub-Committee is also invited to provide their views on which, if any, of the precautionary statements (as provided in the tables under paragraph 7) that acute toxicity Category 5 hazard classes should be listed beneath. In particular, the Sub-Committee is invited to provide their views on what they consider the initial action should be following exposure to chemicals that are classified as either:

- (a) **Acute toxicity inhalation Category 5** - should the first action be to get medical help or to remove the exposed person to fresh/clean air (and then get medical help)?
 - (b) **Acute toxicity dermal Category 5** - should the first action be to get medical help or should the exposed skin be first washed with plenty of water (and then get medical help)?
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