

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

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HAZARD COMMUNICATION ISSUES

Codification of precautionary statements

Transmitted by the representative from the European Chemical Industry Council (CEFIC)
on behalf of the precautionary statements correspondence working group

Introduction

This paper is submitted as an explanatory note concerning the principles adopted in the simplification and rationalisation of precautionary statements as listed in Addendum 1 to document ST/SG/AC.10/C.4/2006/8. This concerns the texts for sections 2 and 3 of Annex 3 of the proposal.

Discussion

The work described in this paper builds upon the work described in paper ST/SG/AC.10/C.4/2005/8 from Australia. The primary aim was to reduce the amount of work involved in the translation of precautionary statements from the languages in which the GHS is published into other languages. For example in the European Union precautionary statements are required in twenty languages.

As a starting point an assumption was made that where precautionary statements in the current annex 3 were separated by white space, then these constituted separate individual precautionary statements. This proved not always to be the case, for example in the case of the response precautionary statements for self-reactive substances (on page 323 of the English edition of the GHS), where the first statement is separated from the second by white space, but the two statements are obviously inter-dependent. There are other, less clear-cut, cases where in the current Annex 3 precautionary statements are separated by white space but may be inter-dependent, for example the response statements for acute toxicity by inhalation (on page 347 of the English edition of the GHS). In these cases the sequence of precautionary statements in the proposal for section 3 of annex 3 has been maintained so as to retain the meaning or intention of the original precautionary statements. However it should be pointed out that as section 3 of annex 3 is guidance and precautionary statements have been harmonised but not standardised, in practice the inter-dependence of some of these precautionary statements may be lost in their application.

Individual sentences, or phrases within sentences, that were common to a number of precautionary statements were identified to be an individual precautionary statement in section 2 of annex 3 of the proposal. For example in the current annex 3 the hazard classes for flammable liquids and skin corrosion for hazard categories 1 to 3 and 1A to 1C respectively of annex 3 contain a precautionary

statement consisting of 3 sentences “IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower.” This was split into 3 separate precautionary statements in section 2 of annex 3 of the proposal. The individual sentence “Remove/Take off immediately all contaminated clothing” is also used as a precautionary statement for acute dermal toxicity for hazard categories 1 to 3.

Similarly in the current annex 3, “In case of fire” is used as an individual statement for self-reactive substances of Types A and B, but it is also used as part of other statements i.e., “In case of fire, stop leak if safe to do so” for oxidising gases, “In case of fire, evacuate area” for explosives, and “In case of fire, use ... for extinction” for a number of physical hazard classes. Where current precautionary statements were split, as described above, it was established that splitting of the current statements or sentences would not alter their meaning. A further pre-requisite was not to alter the substance of the content of the GHS.

These individual sentences or phrases, only require to be translated once for section 2 of annex 3 of the proposal, and can then be subsequently recombined in section 3 of annex 3 as precautionary statements in as many forms as they occur. In the proposal section 3 of annex 3 gives the precautionary statement codes and the corresponding text as illustrated therein.

In a number of cases the rationalisation or simplification has been achieved by combining precautionary statements into multiple choice precautionary statements, for example “Wear protective gloves/protective clothing/eye protection/face protection”, P280 in the proposal, with corresponding amendments or additions of or to the conditions relating. This phrase replaces six individual precautionary statements of similar wording which provided differing combinations of the protective equipment to be used. In this case, the protective equipment to be used that appeared in the original precautionary statement has been specified in column 5 (Conditions for use) in section 2 of annex 3 of the proposal.

In some cases the same, or similar phrases appeared under two different types of precautionary statement, for example “Protect from sunlight” appeared as part of a storage precautionary statement for flammable aerosols, as part of a different storage precautionary statement for gases under pressure, as part of a prevention precautionary statement for self-heating substances and as an individual storage precautionary statement for organic peroxides. These only appear once in section 2 of annex 3 of the proposal.

Where changes in precautionary statements would have led to a change in substance, the changes have not been made. For example in the response statements for acute toxicity by inhalation, hazard categories 1 and 2 have been assigned the statement “Do not breathe dust/ fume/ gas/ mist/ vapour/ spray”, whereas for hazard categories 3 and 4 the corresponding precautionary statement is “Avoid breathing dust/ fume/ gas/ mist/ vapour/ spray”. To have combined these would have lost the differentiation between the hazard categories. A further example is the response precautionary statement for acute dermal toxicity, where hazard categories 1 and 2 are differentiated from hazard categories 3 and 4 by the addition of the word “Gently” in front of the sentence “Wash with plenty of soap and water” (precautionary statements P350 and P352 in the proposal). However if the sub-committee considers that rationalisation and simplification is more desirable than maintaining this type of differentiation, then there is scope for much greater rationalisation.

Precautionary statement texts that have been amended are detailed in Annex 2 of the proposal. In some cases the changes are purely of an editorial nature for the correction of errors, for example in the second response precautionary statement for skin irritation hazard category 2, P362 in the proposal (on page 352 of the English edition of the GHS), the word “of” has been replaced by “off”.
