

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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DEVELOPMENT OF GUIDANCE FOR IMPLEMENTATION

Precautionary Statements

Maintenance and further development of Annex 3

Transmitted by the World Health Organization (WHO)
on behalf of the International Programme on Chemical Safety (IPCS)¹

Purpose

1. The purpose of this document is to initiate discussion on the need for maintenance and further development of a system of precautionary statements under the GHS following the adoption of the guidance provided in the revised Annex 3 (ST/SG/AC.10/C.4/2004/8/Rev.1).

Background

2. Proposed guidance for a revised system of precautionary statements is given in a revised Annex 3 as part of the GHS (ST/SG/AC.10/C.4/2004/8/Rev.1). Annex 3 is proposed for adoption at the Eighth session of the Sub-Committee. The revised Annex provides guidance for four types of precautionary statements covering 1) prevention 2) response in cases of accidental spillage or exposure, 3) storage and 4) disposal. The revised Annex 3 is regarded as a living document subject to further development and refinement.

3. On behalf of WHO, IPCS has participated in the correspondence group on precautionary statements and fully supports the adoption of the revised Annex 3. IPCS has undertaken additional consultation with specific experts in first-aid, clinical treatment and management of chemically exposed persons and with experts involved in the development of International Chemical Safety Cards (ICSC). The proposal is a significant improvement on the existing Annex which contains several measures which are counter to the effective management of poisoning and which need to be replaced without further delay.

4. As part of carrying out consultations on the proposed Annex IPCS held a global Workshop on Poisons Centres and the GHS involving experts in clinical toxicology, public health, occupational health and safety, poisons information, first-aid and emergency response from five out of six WHO regions ("Freiburg Workshop" see UN/SCEGHS/7/INF.25). IPCS acknowledges the project funding provided by the German Federal Ministry of the Environment, Nature Conservation and Nuclear Safety for the Freiburg Workshop and the opportunities this created to raise awareness of the GHS in the health-sector and to provide detailed comment to the correspondence group.

¹ The International Programme on Chemical Safety (IPCS) is a cooperative programme between the World Health Organization (WHO), the International Labour Organization (ILO) and the United Nations Environment Programme (UNEP). WHO's Programme for the Promotion of Chemical Safety (PPCS) provides the Central Unit of IPCS.

5. The Freiburg Workshop and relevant WHO and ILO carried out under the auspices of IPCS both provide examples of the types of issues that should be considered in a future maintenance system.

The need to identify, engage and foster collaboration with poisons centres and professionals within the field of poisons information and clinical toxicology.

6. The Revised Annex 3 includes the precautionary advice "Call a Poisons Centre or Doctor/Physician" consistent with the recognized functions of poisons centres to provide information and advice on the appropriate management of exposures to chemicals. This role of poisons centres and doctors/physicians highlights the desirability and value of consultation within countries to identify the centres concerned and their potential role in the day-to-day implementation of the GHS (ST/SG/AC.10/C.4/14) and feedback from poisons centres during the GHS implementation phase.

7. The need for specific first-aid advice for a limited number of specific chemicals where specific antidotes exist remains an outstanding issue from the Freiburg Workshop e.g. cyanide, methanol. In addition, the Workshop found that the lack of consistency in the guidance found in standard first-aid texts should be improved. As a part of follow-up to the Freiburg Workshop, IPCS is undertaking a review of a key reference document the IPCS Handbook on the Management of Poisoning (http://www.intox.org/databank/documents/forms/mgt_poison_web_form.html). This review will enable first-aid advice for specific chemicals and other first-aid and management advice to be updated in the context of the GHS. The Handbook might also thereby provide a formal adjunct to the GHS system.

8. The need for and availability of specific antidotes for the treatment of chemical poisoning is also relevant to the ongoing review of essential medicines within WHO. As defined by WHO, essential medicines are considered to be those that satisfy the health care needs of the majority of the population. They should, therefore be available in adequate amounts and at a price that individuals and the community can afford. An evidence-based approach is used by the WHO to identify these medicines. The inclusion of a specific medicine or antidote in the WHO Model List of Essential Medicines assists countries in improving their access to antidotes. (<http://www.who.int/medicines/default.shtml>). Ensuring that the list is consistent with any specific antidotes referred to by the GHS is another way of strengthening GHS implementation.

9. IPCS has active links with poisons centres in over 80 countries (e.g. through IPCS Yellow-Tox - an international directory of poisons centres <http://www.who.int/ipcs/poisons/centre/directory/en/> and the IPCS-INTOX -General electronic discussion group (<http://www.intox.org>) and with the associations of professional clinical toxicologists such as the American Academy of Clinical Toxicologists (AACT) and the European Association of Poisons Centres and Clinical Toxicologists (EAPCCT). Involvement of the AACT and the EAPCCT in the ongoing process for maintenance of the WHO List of Essential Drugs and in activities to promote awareness of the GHS is currently under discussion.

The need for linkage with the IPCS International Chemical Safety Cards (ICSC)

10. Revised Annex 3 has been developed using existing precautionary statements to the maximum extent. The IPCS International Chemical Safety Card (ICSC) Compilers Guide was one of the three key systems used. ICSCs provide information on the intrinsic hazards of specific chemicals together with first-aid and fire-fighting measures, and information about precautions for spillage, disposal, storage, packaging, labelling and transport. IPCS has a commitment to the ongoing development of ICSC. The Compilers Guide has been developed to enable computer-aided translation into different languages. ICSCs written in accordance with the Compilers Guide are available for over 1400 chemical substances, in English and 15 other languages (including Chinese, Japanese, Korean, Swahili Thai, Urdu, and Vietnamese as well as many European languages). As new ICSC are prepared and additional languages included a mechanism of ongoing feedback would be desirable should any difficulties or new issues arise.

11. In anticipation of agreement to the revised Annex 3, IPCS has initiated a detailed review of the ICSC Compilers Guide with a view to identifying and removing any remaining inconsistencies with the GHS system. This process will enable that the substantial work already undertaken on ICSC is available for

countries to use as part of their national implementation efforts. The IPCS review should be completed before the end of 2005.

Conclusion

12. The efforts described above are being undertaken by IPCS on behalf of WHO and ILO. These efforts could be used effectively to contribute to support of implementation of the GHS. Of particular note is:

- the need to maintain consistency of first-aid approaches taken by a number of specialist health-related professionals such as clinical toxicologists and to further build on their involvement in the GHS;
- the need for ongoing linkage with the IPCS System for International Chemical Safety Cards (ICSC); and
- the value in connecting existing activities being undertaken by WHO/IPCS with the need to support implementation of GHS to avoid duplicative work, enable ongoing feedback, support countries and create synergies between the existing activities of WHO/IPCS and the GHS.

13. WHO would appreciate the views of others on possible mechanisms for maintenance and further development of precautionary statements following the adoption of Annex 3. WHO/IPCS would welcome the further elaboration of a cooperation/working relationship with the Subcommittee on these issues.
