

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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HAZARD COMMUNICATION ISSUES

Revision of annexes 1, 2 and 3 of the GHS: precautionary statements

Transmitted by the expert from the United Kingdom on behalf of
the correspondence group

Introduction

1. At its fifteenth session (July 2008), the Sub-Committee considered information document UN/SCEGHS/15/INF.26, which presented on behalf of the correspondence group on Annexes 1-3, suggestions for improving the workability of the GHS hazard and precautionary statements.
2. The correspondence group's work on hazard statements has resulted in a formal proposal and is presented in working document ST/SG/AC.10/C.4/2008/24.
3. This paper updates the Sub-Committee on the correspondence group's ongoing work on precautionary statements (PS).

Background – GHS precautionary statements

4. Presently there are a number of factors limiting the usability of the GHS PS:
 - (a) A high number of PS may be triggered for a substance or mixture, even with a relatively simple classification. Including all the statements triggered for a given substance would arguably confuse the user and reduce the effectiveness of hazard and safety communication;
 - (b) Selection of appropriate PS by manufacturers and suppliers can be difficult when a large number are triggered, and there is currently no clear guidance for doing this;

- (c) Different hazard classifications trigger similar but different PS, leading to arguably unnecessary small differences between precautionary measures recommended in different circumstances.

5. Given the number and relatively unstructured nature of the existing PS, there is substantial scope for reducing both the number of PS and the amount of precautionary “wordage” that must appear on labels. Additionally, there is the possibility of including further advice to assist users to select a manageable number of statements.

6. The informal correspondence group are currently considering six approaches to address the above problems (these were outlined in more detail in UN/SCEGHS/15/INF.26).

7. Approaches under consideration

- (a) Rationalisation/reduction in number of precautionary statements

The correspondence group are considering how the existing PS could be combined or edited to reduce their overall number and complexity. The general principles adopted have been to propose the use of a single statement in cases where more than one statement recommends very similar or identical precautionary measures, or to propose shorter or simpler statements where possible.

- (b) Combination of precautionary statements

The correspondence group are exploring proposals to include further combined PS in the tables A3.2.1 - A3.2.5. Such proposals are being considered when they can reduce the amount of text required without detracting from clarity and comprehensibility for all users.

- (c) Re-grouping of precautionary statements

Currently PS are grouped into 4 categories: Prevention, response, storage and disposal. However, the correspondence group are considering proposals for re-grouping the statements as listed in Tables A3.2.1 – A3.2.5 and the matrix in A3.3.5 in order to bring the groupings into closer correspondence with the headings in Safety Data Sheets. One advantage of such a revision is that it would make the structure of Safety Data Sheets and the tables for selecting PS more consistent, and the links between the two clearer. A second is that in some cases it would allow some further reductions in the number of PS by allowing use of a single statement where more than one very similar statement is currently included in more than one category.

- (d) Guidance for selection of precautionary statements

Inclusion of further guidance to aid selection of appropriate PS is being considered by the correspondence group, specifically the inclusion in the table in Section 2 of Annex 3 of guidance on when statements are primarily recommended for workplace or for consumer use. This would allow manufacturers or suppliers marketing chemicals to one

or other of these groups to exclude more quickly those statements which might be less appropriate for the relevant users.

(e) “Signpost” statements

The current approach of the GHS is to assume that labels should contain all the precautionary advice needed by users of the relevant products. However, the correspondence group are exploring the possibility of an alternative approach whereby labels may be used as a means to communicate only the most important safety messages, and include ‘signposts’ which refer to more detailed precautionary advice that is located elsewhere. The further information could be included for example in a safety data sheet or in instructions supplied with the product.

(f) Order of preference for precautionary statements

Currently if the GHS ascribes a range of PS to a product, each PS has equal status, in that none is explicitly preferred over any other for inclusion on the label. However, A3.3.4.6 opens the option of a hierarchy or order of preference could be applied to a given set of PS when several are triggered, recommending which statements in the group are most important for inclusion. The correspondence group is considering how such an “order of preference” might be developed.

Progress since 15th session (July 2008)

8. Extremely useful discussions took place on the proposals in UN/SCEGHS/15/INF.26 at the 15th session, both at the plenary meeting and the break-out meeting of the informal correspondence group. In light of comments received a revised version of UN/SCEGHS/15/INF.26 was circulated to the correspondence group in August.

9. Comments received on this revised draft from members of the correspondence group indicated that although significant progress had been made there were still some outstanding issues to be resolved. While it had originally been hoped to make a formal proposal to the Sub-Committee for the 16th session, it was agreed that this would not be achievable and instead an information document would be submitted to update the Sub-Committee on progress.

10. A meeting of the informal correspondence group has been arranged for 16:30 to 18:00 on Tuesday 9th December, prior to the plenary Sub-Committee meeting. Discussion will take place on the latest working draft of UN/SCEGHS/15/INF.26 and also on information document UN/SCEGHS/16/INF.20, which has been submitted by Canada. The subcommittee will be updated verbally on the outcome of discussions at the meeting.

11. At the 15th session of the Sub-Committee in July, CEFIC submitted information document UN/SCEGHS/15/INF/9, informing the Sub-Committee that it intended to put forward proposals for revising the precautionary statements for physical hazards and inviting contributions to this exercise. Following discussions with CEFIC it is proposed to integrate this into the work of the correspondence group on precautionary statements to ensure that the outcomes of the two exercises are consistent and complementary.

Next steps

12. The agreement of the Sub-Committee to the formal workplan for the informal correspondence group has been sought in working document ST/SG/AC.10/C.4/2008/24. This plan includes as a first priority the continuation of work on reducing redundancy among precautionary statements.

13. Therefore, subject to the agreement of the Sub-Committee, the informal correspondence group will continue its work with a view to producing formal proposals during the next biennium.
