

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**

10 June 2011

Twenty-first session

Geneva, 27–29 June 2011

Item 2 (d) of the provisional agenda

**Updating of the Globally Harmonized System
of Classification and Labelling of Chemicals (GHS)-
Annexes**

Work of the informal correspondence group on improvement of Annexes 1-3 of the GHS

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

Introduction

1. At its 20th session, the UNSCEGHS approved the following work plan for the continuing work of the informal correspondence group on Annexes 1-3 of the GHS:

“Pursue work to further improve Annexes 1, 2 and 3 of the GHS, following the workstreams hereafter, with the first two given priority:

- (i) Workstream 1: to develop proposals to rationalize and improve the usability of hazard and precautionary statements, including proposals to eliminate redundancies among these statements;
- (ii) Workstream 2: to adjust as appropriate the precautionary statements for physical hazards, their allocation to hazard classes and categories, and their conditions for use;
- (iii) Workstream 3: to improve the presentation of Annexes 1, 2 and 3 of the GHS, taking into account the intended audiences, uses and purposes of the GHS”.

2. This document briefly summarises the status of work on each of these workstreams.

Workstream 1 – develop proposals to rationalise and improve the usability of hazard and precautionary statements

3. At its 20th session the Subcommittee approved a set of editorial amendments which aimed at rationalising the existing set of precautionary statements. While these amendments made progress towards improving and rationalising the precautionary statements their effect was relatively small, and a large number of precautionary statements can still be triggered by a given substance or mixture, potentially obscuring effective hazard communication and making selection of appropriate statements difficult for the supplier. Accordingly, the Subcommittee agreed that the informal correspondence group should continue to pursue work on this issue during the 2011/12 biennium.

4. The informal correspondence group has previously considered a number of approaches to improving the usability of the precautionary statements, including the following:

- (a) Editorial amendments to rationalise/reduce/shorten the existing precautionary statements
 - (b) Development of new combinations of precautionary statements
 - (c) Re-grouping of precautionary statements
 - (d) Provision of further guidance for selection of precautionary statements, in particular using the 'conditions for use' column in the tables in Annex 3 part 3 of the GHS
 - (e) Forming an 'order of preference' for precautionary statements, allowing some to be prioritised over others;
 - (f) Use of 'signpost statements' which direct the user of a chemical to alternative places where safety information can be given, such as a safety data sheet or instructions for use.
5. The proposals accepted at the 20th session mostly fell within approach (a), therefore, during the coming biennium the informal group will continue to explore approaches (b) – (f) with a view to bringing forward further proposals as appropriate within the biennium.
6. The informal group will have an initial discussion at its face-to-face meeting at the 21st UNSCEGHS session on how to take this work forward.

Workstream 2 – adjustment of precautionary statements for physical hazards

7. This workstream derives from a proposal originally made by CEFIC in UN/SCEGHS/15/INF.9, to make some revisions to the GHS precautionary statements for physical hazards. CEFIC noted at that time that some amendments to these precautionary statements were needed, as well as alignment of these statements between hazard classes having more or less the same hazard characteristics. It was subsequently agreed that the work should be taken forward within the informal correspondence group on Annexes 1-3, to ensure that the outcomes reached were consistent with the work being carried out on rationalisation of precautionary statements.
8. Since then a draft list of suggestions has been compiled of proposed amendments to physical hazard precautionary statements, which has been circulated to the informal correspondence group for discussion. The group intends to use this as a basis to develop formal proposals to bring forward to the Subcommittee during this biennium.
9. Because this work focuses on physical hazard-specific issues, the informal correspondence group would benefit from the participation of further physical hazard experts who would be willing to contribute to this work. Any experts who are not already part of the group and who would be willing to participate are invited to contact the expert from the UK (email: Pierre.cruse@hse.gsi.gov.uk).
10. The informal correspondence group will discuss modalities for taking this work forward at its face-to-face meeting.

Workstream 3 – improvement of presentation of Annexes 1-3

11. The informal group will discuss at its face-to-face meeting options for taking this work forward over the coming biennium.