



**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**

**Report of the Sub-Committee of Experts on the Globally
Harmonized System of Classification and Labelling of
Chemicals on its twenty-fifth session**

held in Geneva from 1 to 3 July 2013

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I. Attendance

1. The Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals held its twenty-fifth session from 1 to 3 July 2013, with Ms. M. Ruskin (United States of America) as Chairperson.
2. Experts from the following countries took part in the session: Argentina, Australia, Belgium, Brazil, Canada, China, Finland, France, Germany, Italy, Japan, Netherlands, Norway, Poland, Portugal, Qatar, Republic of Korea, Russian Federation, Serbia, South Africa, Sweden, United Kingdom of Great Britain and Northern Ireland, United States of America and Zambia.
3. Under rule 72 of the rules of procedure of the Economic and Social Council, observers from the following countries also took part: Switzerland and Thailand.
4. Representatives of the United Nations Institute for Training and Research (UNITAR) and of the International Maritime Organization (IMO) were present.
5. The following intergovernmental organizations were also represented: European Union and Organisation for Economic Co-operation and Development (OECD).
6. Representatives of the following non-governmental organizations took part in the discussion of items of concern to their organizations: American Cleaning Institute (ACI); Australian Explosives Industry and Safety Group Incorporated (AEISG); Compressed Gas Association (CGA); Croplife International; Dangerous Goods Advisory Council (DGAC); European Chemical Industry Council (CEFIC); European Industrial Gases Association (EIGA); Industrial Federation Paints and Coats of Mercosul (IFPCM); International Association for Soaps, Detergents and Maintenance Products (AISE); International Confederation of Plastics Packaging Manufacturers (ICPP); International Council of Chemical Associations (ICCA); International Council on Mining and Metals (ICMM); International Fibre Drum Institute (IFDI); International Paint and Printing Ink Council (IPPIC); International Petroleum Industry Environmental Conservation Association (IPIECA); Institute of Makers of Explosives (IME); Responsible Packaging Management Association of Southern Africa (RPMASA); Sporting Arms and Ammunition Manufacturers' Institute (SAAMI).

II. Adoption of the agenda (agenda item 1)

Documents: ST/SG/AC.10/C.4/49 (Secretariat)
ST/SG/AC.10/C.4/49/Add.1 (Secretariat)

Informal documents: INF.1, INF.2, INF.6 and INF.12 (Secretariat)

7. The Sub-Committee adopted the provisional agenda prepared by the secretariat after amending it to take account of informal documents INF.1 to INF.20. Discussion of informal document INF.18 was referred to the informal working group on the improvement of Annexes 1, 2 and 3 of the GHS.

III. Classification criteria and hazard communication (agenda item 2)

A. Work of the Sub-Committee of Experts on the Transport of Dangerous Goods on physical hazards

1. Screening procedure for potential explosives

Document: ST/SG/AC.10/C.4/2013/2 (Sweden)

Informal document: INF.17 (Secretariat), paragraph 15

8. The Sub-Committee considered the recommendations made by the Working Group on Explosives of the Sub-Committee of Experts on the Transport of Dangerous Goods (TDG Sub-Committee) to amend paragraph 2.1.4.2.2 (c) of the GHS as contained in informal document INF.17, paragraph 15, which modified the wording originally proposed in document ST/SG/AC.10/C.4/2013/2.

9. Although it was noted that the TDG Sub-Committee had endorsed the recommendations in INF.17, several experts felt that the proposed text needed to be further improved. A small informal editorial group met during the coffee break to consider some editorial changes. However additional issues were raised during the discussions and the experts felt that more time was needed to consider them. The expert from Sweden said that he would submit a revised proposal addressing the issues raised to the next sessions of both sub-committees.

2. Desensitized explosives

Informal documents: INF.5 (Germany)

INF.17 (Secretariat), paragraphs 10–13

10. The Sub-Committee concurred in principle with the TDG Sub-Committee on its support for the development of a new hazard class for desensitized explosives in the GHS. Following some requests for clarification, several experts explained that the four hazard categories proposed were necessary to cover the full range of existing desensitized explosives and that the proposed classification criteria had been developed building on experience acquired over the last 30 years with those chemicals for which extensive test data were available. It was also explained that the distinction between hazard categories 2 and 3 was necessary because storage provisions differed depending on the burning rate.

11. Sub-Committee experts were invited to provide further comments on the classification and test criteria as well as on possible precautionary statements for the proposed hazard categories. The expert from Germany said that she intended to submit a formal document to the next sessions of both sub-committees and invited comments in good time so that she could submit the document by 30 August 2013.

3. Revision of tests in Parts I and II of the Manual of Tests and Criteria

Informal document: INF.17 (Secretariat), paragraphs 4–9

12. The Sub-Committee noted the outcome of the work of the Working Group on Explosives on test series 1 and 2 and test series 6, 7 and 8, as contained in INF.17, paragraphs 4 to 9.

13. The Sub-Committee agreed in principle to the amendments to the definition of Division 1.6 in chapter 2.1, paragraph 2.1.2.1 (f) of the GHS as proposed in INF.17, paragraph 8. The secretariat was requested to include the proposed amendment in a formal

document for the next session. It was noted that the question on whether or not the note between square brackets needed to be included in the GHS would be submitted to the Working Group on Explosives for consideration at its next meeting in 2014.

4. Criteria for water-reactivity

Informal document: INF.17 (Secretariat), paragraph 16

14. The Sub-Committee noted the project status report on the development of criteria for water-reactivity.

5. Classification inconsistencies (application of criteria versus dangerous goods list)

Informal document: INF.17 (Secretariat), paragraphs 20 and 21

15. The Sub-Committee noted the information provided regarding the procedures for assigning a product to a UN No. and for submitting new data on its dangerous properties to the TDG Sub-Committee with a view to updating the existing classifications (and related transport conditions) in the Dangerous Goods List of the UN Model Regulations on the Transport of Dangerous Goods.

B. Practical classification issues

16. The Sub-Committee noted that the informal working group had reached consensus on four of the issues discussed during its meeting on 2 July 2013 and that a document would be submitted to the next session.

C. Corrosivity criteria

Informal documents: INF.9 and INF.9/Add.1 (CEFIC)
INF.11 (United Kingdom)
INF.17 (Secretariat), paragraphs 18 and 19

17. The Sub-Committee entrusted the consideration of these documents to the joint TDG-GHS working group on corrosivity which met on 1 July 2013, following the opening of the plenary session. The expert from the United Kingdom informed the Sub-Committee about the outcome of the meeting (see paragraphs 18–21 below).

18. Some experts were of the opinion that the current classification scheme provided harmonized results for all sectors when based on *in vivo* data, and that the inconsistencies occurred when classification results were derived either from translation of previous classification results into GHS hazard classes/categories or from using alternative classification methods, which usually led to over-classification. Taking into account that the over-classification of corrosive substances had a direct impact on transport and storage conditions the working group concluded that the outcomes should not lead to reclassification of Class 8 substances in transport, and should not default to more severe classification or assignment to a more onerous packing group than appropriate.

19. While some experts considered that deletion of sub-categories 1A, 1B and 1C in the GHS would solve the issue of over-classification within Category 1 others thought that sub-categorization was also being used in the workplace to specify appropriate engineering controls or personal protective equipment and therefore considered that they should not be deleted. It was also noted that not all jurisdictions had adopted the sub-categories.

20. Several experts favoured option 6 as the best compromise to address the needs of all sectors and recognized that further work was needed to define the conditions under which

alternative methods (including those which did not result in sub-categorization such as pH and non-additivity methods) could be used while ensuring that the results were consistent with the requirements for transport. Options 2 and 5 also received support.

21. On the use of expert judgement and weight of evidence, the group noted that a positive result under human exposure should always supersede the results obtained from test methods and agreed that the concept of expert judgement needed to be further clarified.

22. Following the request from the joint working group to hold a meeting in December 2013 and after consultations between the Chairman of the TDG Sub-Committee and the secretariat, the Sub-Committee was informed that the next meeting of the joint TDG-GHS working group was scheduled to take place on Tuesday 3 December (afternoon).

23. The representative of OECD informed the Sub-Committee that Test Guideline 431 on alternative methods for corrosivity testing had been updated and was expected to be adopted before the end of 2013. He invited the joint working group to take the revised Test Guideline into account during their deliberations.

D. Dust explosion hazards

24. The Sub-Committee noted that a “thought-starter” document addressing the development of a new chapter or guidance in the GHS for dust explosion hazards was under preparation and would be submitted at the next session. It was also noted that a meeting of the informal working group would be convened during the December session.

E. Aspiration hazard: viscosity criterion for classification of mixtures

25. The representative from IPPIC said that work on this issue was continuing and encouraged Sub-Committee experts to join the informal group and participate in the discussions.

F. Nanomaterials

Documents: ST/SG/AC.10/C.4/2013/3 (France)
ST/SG/AC.10/C.4/2013/4 (Australia)

26. The majority of experts who spoke considered that nanomaterials could be covered under the existing GHS hazard classes and categories and therefore were not in favour of developing specific hazard classification guidance for these substances. Most experts concurred that the specific characteristics of nanomaterials could be addressed in a more general way in the Safety Data Sheet by including information such as particle characteristics, size, specific surface area, etc. Others suggested that as a first step, manufacturers could be requested to identify products containing nanomaterials and mentioned that the general lack of information and control of their manufacture and distribution were a concern, particularly for developing countries, and had been identified as a global emerging issue during the third session of the International Conference on Chemicals Management (ICCM3) held in Nairobi in September 2012.

27. Furthermore, most experts did not see the need for a definition of nanomaterials and noted the different size ranges used to define nanomaterials in existing definitions developed at international level.

28. Taking into account the comments made, the expert from France volunteered to lead an informal working group to see how nanomaterials could be addressed within the GHS. It

was agreed that the group should start by clearly defining the terms of reference for its work.

G. Miscellaneous

1. Articles as environmentally hazardous substances

Document: ST/SG/AC.10/C.4/2013/1 (Germany)

Informal documents: INF.3 (Germany)
INF.17 (Secretariat), paragraph 22

29. The Sub-Committee noted that the TDG Sub-Committee had decided to consider this issue within the framework of a more general discussion on classification of articles containing any type of hazardous substances and that consideration of this matter had been entrusted to a correspondence working group led by the expert from the United Kingdom in the TDG Sub-Committee. GHS Sub-Committee experts were invited to join their counterparts in the TDG Sub-Committee and participate in the work of the informal working group.

2. Pyrophoric gases: proposal for a new hazard in the GHS

Informal document: INF.15 (United States of America)

30. There was general support for addressing pyrophoric gases in the GHS. There was discussion as to whether developing a new hazard category or sub-category within the existing hazard class “flammable gases” or a new hazard class was preferable.

31. Some experts considered that the proposal should also address classification of flammable mixtures containing 1% or more of pyrophoric components and explained that the 1% cut-off value would ensure compliance with transport regulations. Some others suggested that specific precautionary statements should be developed.

32. The expert from the United States said that a formal document would be submitted to the next sessions of both sub-committees for consideration.

3. Editorial amendment to table 3.2.1

Informal document: INF.19 (IPPIC)

33. Noting that it was a very late document and that the proposal was based on the text of the 4th revised edition of the GHS, the representative of IPPIC was invited to submit a revised proposal based on the text of the 5th revised edition well in time for the next session of the Sub-Committee.

IV. Hazard communication issues (agenda item 3)

A. Revision of section 9 of Annex 4

Informal document: INF.20 (Germany)

34. The Sub-Committee noted the outcome of the meeting of the informal working group held on 1 July 2013, as well as the next steps for further work outlined in INF.20.

B. Labelling of small packagings

Informal document: INF.13 (CEFIC)

35. The informal working group on labelling of small packagings met on 2 July 2013.

36. The representative from CEFIC informed the Sub-Committee that the informal working group had considered the example in INF.13 and had suggested some modifications to the labelling of the immediate container. It had also agreed that the example would be tested for feasibility in practice, amended to reflect the actual label size, and further discussed at the next session. The Sub-Committee noted that the informal working group intended to continue working on the development of additional examples.

C. Improvement of annexes 1 to 3 and further rationalization of precautionary statements

Informal document: INF.18 (Sweden)

37. The expert from the United Kingdom informed the Sub-Committee about the outcome of the meeting of the informal working group held on 1 July 2013 (see paragraphs 38–42 below).

38. Discussions focused mainly on the work to be undertaken by the informal working group during the biennium within the mandate to further develop proposals to rationalize and improve the usability of the GHS precautionary statements.

39. Many experts felt that the large number of precautionary statements that could be triggered by many chemicals was still an issue and that further guidance, possibly including a ranking or priority ordering of precautionary statements, was needed, in particular to help smaller companies dealing with product labelling and to help ensure consistency in the way labels were designed. However, other experts pointed out that some jurisdictions required all precautionary statements triggered to appear on the label so any proposals would need to be carefully formulated to properly reflect this fact.

40. As a way forward, the idea of further developing priority rules for precautionary statements was generally supported and as a starting point it was agreed that the group would look at some precedence principles already mentioned in Annex 3 of the GHS (e.g. that for response statements, precautionary statements for acute hazards should take priority over those for chronic hazards) and to investigate whether they could be further developed and illustrated.

41. The informal working group will take this forward over the coming months and will report on its progress at the next session.

42. The informal working group also considered informal document INF.18 but most delegates said they would need to consult further on the proposals. Consequently, the group decided to reconsider this proposal at a later date.

D. Miscellaneous

1. Practical alternatives to empty pictogram frames

Informal document: INF.7 (DGAC)

43. The Sub-Committee did not support the introduction in the GHS of a general statement allowing the use of any of the alternative pictograms shown in the Annex to INF.7. Some experts indicated that pictograms including text were difficult to implement in

multilingual countries/regions while others indicated that the other pictograms proposed in INF.7 could be misleading or misunderstood. It was recognized, however, that the issue raised needed to be further considered.

44. The representative of DGAC took note of the comments made and said that he would consult other industry representatives and would consider revisiting the issue in the future.

2. Size of GHS pictograms relative to transport labels and placards

Informal documents: INF.8 (DGAC)
INF.17 (Secretariat), paragraph 23

45. The Sub-Committee noted that the TDG Sub-Committee did not have time to consider the document. However, the Chairman of the TDG Sub-Committee had indicated that another document relevant to this issue had been discussed, as indicated in INF.17 paragraph 23. It was pointed out that, contrary to GHS pictograms and labels, transport labels and placards were intended to be easily recognizable from a distance for emergency response purposes, and that this safety requirement should be taken into account in the communication of hazards under the GHS (e.g. by ensuring that GHS pictograms were smaller than transport labels). It was also noted that transport regulations prescribed minimum dimensions for labels and placards and that exemptions were allowed only in specific cases where the nature of the means of containment itself (e.g. some pressure receptacles) did not allow for the standard dimensions to be used.

46. Regarding the issue raised in INF.8, several experts noted that the labelling shown in the example did not conform to current transport or GHS labelling provisions and therefore could not be used to determine whether more guidance was needed in the GHS. It was recognized, however, that it might be necessary to evaluate how GHS labelling elements could be used on portable tanks and tank containers used in workplaces.

47. The representative of DGAC was invited to take account of the comments made and to submit a revised document on this issue including examples of portable tanks/containers labelled or marked with current transport and GHS labelling elements.

V. Implementation of the GHS (agenda item 4)

A. Development of a list of chemicals classified in accordance with the GHS

Informal documents: INF.10 (Secretariat)
INF.14 (United States of America)

48. The Sub-Committee noted the outcome of the meeting of the informal working group held on 2 July 2013 (see paragraphs 49–55 below).

49. Informal working group members were informed that due to lack of resources, the web portal developed by the Occupational Safety and Health Administration of the Department of Labor of the United States of America to facilitate the exchange of documents within the informal working group would no longer be available. The informal working group would continue to work by correspondence.

50. Views were divided within the informal working group as regards the selection criteria for chemicals for the pilot classification exercise. While some experts considered that priority should be given to substances for which different classification results had been identified, others considered that it would be preferable to first address classification

of substances for which reliable data sets were available and for which consensus on a harmonized classification would be more readily achievable. After some exchange of views, the group agreed that during the pilot exercise two approaches should be considered in order to get a better insight of the resources needed and the issues which might arise before taking a decision on the approach to be followed for the development of the harmonized list.

51. The first approach would be to perform hazard classifications from data available by the Sub-Committee of experts, OECD or other internationally recognized expert bodies.

52. The second approach would be to compare classifications given in existing lists to identify substances with similar or equal classification results. The OECD eChemPortal was identified as one of the tools which could be consulted to easily identify such substances.

53. The pilot exercise would also include evaluation of the approach in light of the guiding principles as well as the resources needed by the Sub-Committee or other bodies to create and maintain a list and agree on the classification.

54. Some experts felt that a non-binding classification list developed and maintained by the sub-committee would avoid duplication of effort by countries developing their own lists.

55. Regarding the proposed template, it was suggested that the entries for physical, health and environmental hazards be further developed.

56. The Sub-Committee was informed that a revised version of the template as well as a list of candidate substances for the pilot classification exercise would be submitted to the next session.

B. Reports on the status of implementation

1. European Union

57. The Sub-Committee noted that the European Union had adopted the 4th adaptation to technical and scientific progress¹ (ATP) to the Classification, Labelling and Packaging Regulation (CLP Regulation), which was published in the Official Journal of the European Union on 1 June 2013. The 4th ATP aligns the CLP Regulation with provisions introduced by the 4th revised edition of the GHS. Related guidance material on classification and labelling is being updated accordingly.

58. It was also noted that the Classification and Labelling Inventory was available on the website of the European Chemicals Agency (ECHA)². The Inventory is a searchable database containing classification and labelling information on notified and registered substances received from manufacturers and importers, as well as the list of harmonized classifications in tables 3.1 and 3.2 of Annex VI to the CLP Regulation. It was indicated that the Inventory could be a useful source of information in the framework of the discussion on the possible development of a harmonized list of chemicals classified in accordance with the GHS.

¹ Commission Regulation (EU) No 487/2013 of 8 May 2013 amending, for the purposes of its adaptation to technical and scientific progress, Regulation (EC) No 1272/2008 of the European Parliament and of the Council on classification, labelling and packaging of substances and mixtures.

² <http://echa.europa.eu/information-on-chemicals/cl-inventory> (accessed 2 July 2013).

2. Canada

59. The Sub-Committee noted that Canada had published a draft proposal for the implementation of the GHS for workplace chemicals, a summary of which could be accessed on the website of Health Canada³. The full text of the proposal is available by request and is open for public comment until 15 September 2013. The expert from Canada invited other Sub-Committee experts to provide feedback on the draft proposal.

3. Southern African Development Community

60. The Sub-Committee noted that member countries of the Southern African Development Community (SADC) had published a regional GHS policy which was agreed and signed by the Ministries of Trade and Industry last year for GHS implementation by January 2020.

4. Zambia

61. The Sub-Committee noted that Zambia, as a country member of SADC, had also signed the SADC regional policy on GHS. It was also noted that several activities related to the GHS had already been completed (e.g. the updating of national standards on the transport of dangerous goods and on the GHS to reflect the provisions of the 17th revised edition of the Model Regulations and the 4th revised edition of the GHS; the situation and gap analysis and the development of a road map for GHS implementation). One of the key issues identified during the development of the road map was the need for advanced training on GHS classification and labelling. On implementation periods, the Sub-Committee was informed that although the road map did not define specific dates, it was expected that implementation for substances would last 3 years, and that implementation for mixtures would follow.

5. China

62. The Sub-Committee noted that a catalogue containing mandatory GHS classifications for more than 3,000 substances was being finalised and was expected to be released before the end of 2013 as an Annex to the regulation on management of chemicals. In response to a question from the representative from CEFIC, the expert from China indicated that the catalogue would be made publicly available in Chinese only.

C. Cooperation with other bodies or international organizations

63. The Sub-Committee noted that the Virtual Working Group on GHS Data Exchange of the Asia Pacific Economic Cooperation Chemicals Dialogue (APEC CD)⁴ was currently considering the development of a comparison list of chemicals classified in accordance with the GHS in the APEC region and the assessment of data quality for classification purposes. These activities were being considered on the understanding that the principles for the development of a classification list agreed by the Sub-Committee would be respected and that they would complement the work initiated by the Sub-Committee on the possible development of a globally harmonized list of classified chemicals.

³ http://www.hc-sc.gc.ca/ewh-semt/consult/_2013/ghs-sgh/index-eng.php (accessed on 2 July 2013).

⁴ <http://cdappec.ru/VWGDE/> (accessed on 2 July 2013).

VI. Development of guidance on the application of GHS criteria (agenda item 5)

Examples of the application of the GHS criteria

Informal document: INF.6 (Secretariat)

64. The Sub-Committee welcomed the availability of the examples of the application of GHS criteria on the secretariat's website⁵. It was noted that some of the amendments to the example in sub-paragraph (b) under the heading for Chapter 3.2 (interpolation within one hazard category using skin corrosion *in vitro* data from a human skin model test (OECD Test Guideline 431)) adopted by the Sub-Committee at its 24th session were missing. A member of the secretariat said that the corrected example would be made available on the website shortly.

VII. Capacity building (agenda item 6)

Informal document: INF.16 (UNITAR)

65. The Sub-Committee noted that a number of projects and capacity building and awareness raising activities related to GHS implementation had been completed, were being conducted or were foreseen both at national and regional levels worldwide as detailed in paragraphs 2–9 of INF.16.

66. It was also noted that the GHS guidance and training materials were being updated in accordance with the 5th revised edition and that UNITAR, in cooperation with the International Labour Organization, was working on the development of a GHS module to be included in the "toolbox for decision-making in chemicals management". The toolbox (developed by the Inter-Organization Programme for the Sound Management of Chemicals (IOMC)) is aimed at countries that wish to address specific national issues regarding chemicals management.

VIII. Other business (agenda item 7)

Informal document: INF.4 (Secretariat)

67. The Sub-Committee noted the information provided by OECD on the designation of the Task Force on Hazard Assessment as the focal point for GHS work on health and environmental hazards following the removal of the former Task Force on Hazard Communication and Labelling from the list of sub-bodies of the OECD Joint Meeting.

IX. Adoption of the report (agenda item 8)

68. In accordance with established practice, the Sub-Committee adopted the report on its twenty-fifth session on the basis of a draft prepared by the secretariat.

⁵ <http://www.unece.org/trans/danger/publi/ghs/guidance.html>.