

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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Item 3(c) of the provisional agenda

**Hazard communication issues: Improvement of annexes 1 to 3 and
further rationalization of precautionary statements**

Proposal to the informal correspondence group on next steps to improve Annexes 1-3 of the GHS

**Transmitted by the expert from the United Kingdom on behalf of the
informal working group on the improvement of annexes 1 to 3**

Background

1. The 5th edition of the GHS, published in May 2013, included a number of changes prepared by the informal correspondence group and agreed by the Sub-Committee during the biennium 2011-2012¹, including the adjustments to the precautionary statements for physical hazards and a new presentation for Annex 1 and 2 of the GHS adopted at its 24th session in December 2012².

2. The group's revised terms of reference for the period 2013–2014 are given in ST/SG/AC.10/C.4/48, Annex IV:

Work stream 1: to develop proposals to rationalise and improve the usability of hazard and precautionary statements. These may include proposals to eliminate redundancies among these statements, and proposals for further guidance and precedence rules for use of the statements.

Work stream 2: to address any other issues relating to Annexes 1-3 and the use of hazard and precautionary statements that the subcommittee wishes to refer to the informal correspondence group.

Further work for the correspondence group

3. At its 25th session in July 2013, the Sub-Committee noted³ that suppliers still needed help dealing with the number of precautionary statements triggered to appear on product labels (see example in Annex 1 to this document). Although it was noted that some jurisdictions currently require all precautionary statements triggered by the GHS to appear on the label, the Sub-Committee agreed to use the precedence principle given in paragraph

¹ Document ST/SG/AC.10/40/Add.3.

² Refer to the report of the Sub-Committee on its 24th session, documents ST/SG/AC.10/C.4/48 (paragraphs 16 and 17) and ST/SG/AC.10/C.4/48/Add.1

³ Refer to the report of the Sub-Committee on its 25th session, ST/SG/AC.10/C.4/50, paragraphs 37–42.

A3.3.4.6 of Annex 3 of the GHS (e.g. that for response statements, precautionary statements for acute hazards should take priority over those for chronic hazards) as a starting point to develop further guidance.

4. The following examples illustrate a precedence-based approach:

(a) Prevention (health):

Code (1)	Prevention precautionary statements (2)	Hazard class (3)	Hazard category (4)	Condition for use (5)
P271	Use only outdoors or in a well-ventilated area.	Acute toxicity - Inhalation	1,2,3,4	Discretionary – where P260 or P261 already appear on the label.
		Specific Target Organ Toxicity (Single Exposure) tract irritation	3	
		Specific Target Organ Toxicity (Single Exposure) narcotic effects	3	

P260: Do not breathe dusts or mists,

P261: Avoid breathing dust/fume/gas/mist/vapours/spray.

(b) Response (health):

Code (1)	Response precautionary statements (2)	Hazard class (3)	Hazard category (4)	Condition for use (5)
P308 + P313	If exposed or concerned: Get medical advice/attention	Germ Cell Mutagenicity	1A, 1B, 2	Manufactures/supplier or the competent authority to select medical advice or attention as appropriate; Discretionary – where P310, P311, P312, P315 or P307 + P311 already appear on the label
		Carcinogenicity	1A, 1B, 2	
		Reproductive toxicity	1, 1B, 2	
		Reproductive toxicity effect on or via lactation	Additional category	
P314	Get medical advice/attention if you feel unwell	Specific organ target toxicity, repeated exposure	1,2	Manufactures/supplier or the competent authority to select medical advice or attention as appropriate; Discretionary – where P310, P311, P312, P315 or P307 + P311 already appear on the label

P310 - Immediately call a POISON CENTER or doctor/physician,

P311 - Call a POISON CENTER or doctor/physician

P312 - Call a POISON CENTER or doctor/physician if you feel unwell

P315 - Get immediate medical advice/attention

P307 + P311 - If exposed: Call a POISON CENTER or doctor/physician

5. As both P308 + 313 and P314 are triggered by chronic health hazards, their appearance on label could be discretionary when other precautionary statements, triggered by acute health hazards, already appear.

6. Unlike rationalisation, this process does not aim to remove any superfluous precautionary statements from the GHS, it simply indicates their relative importance. Furthermore, the approach could be framed in a way that the precedence established is optional, and as such, need only be applied by those jurisdictions who wish to adopt such a precedence-based approach.

Next steps

7. The informal correspondence group will consider how to take forward the new terms of reference and report back to the sub-committee on its progress. Subject to the views of the Sub-Committee, the aim would be to prepare further proposals to improve the workability of precautionary statements by the end of the biennium.

Annex 1

Formaldehyde (37 %) stabilised with 10% Methanol and 1% Papain*



Danger

H301+H311+H331; H314; H334; H317; H351; H370

Toxic if swallowed, in contact with skin or if inhaled. Causes severe skin burns and eye damage. May cause allergy or asthma symptoms or breathing difficulties if inhaled. May cause an allergic skin reaction. Suspected of causing cancer. Causes damage to organs (Eye).

Prevention: P264; P270; P280; P261; P271; P260; P261; P272; P285; P201; P202

Response: **P301+P310**; P321; P330; P302+P352; **P312**; P321; P361+P364; P304+P340; **P311**; P301+P330+P331; P303+P361+P353; P363; P304+P340; **P310**; P305+P351+P338; **P342+P311**; **P333+P313**; P326+P324; P308+P313; **P308+P311**

IF SWALLOWED: Immediately call a POISON CENTER/doctor... Call a POISON CENTER/doctor/...if you feel unwell. Call a POISON CENTER/doctor...Immediately call a POISON Center/doctor/...If experiencing respiratory symptoms: Call a POISON CENTER/doctor...If skin irritation or rash occurs: Get medical advice attention. If exposed or concerned: Get medical advice/attention. • If exposed or concerned: Call a POISON CENTER/doctor/...

Storage: P405; P403+P233;

Disposal: P501

*discretionary precautionary statements underlined