

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 4 (b) of the provisional agenda

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

Precautionary statements on medical advice or attention in GHS

Transmitted by the representative from the European Union

Background

1. This document concerns the distinction between “medical advice” and medical attention in precautionary statements P313, P314 and P315.¹

2. The English version of P313, P314 and P315 contains the phrase "Get medical advice/attention". The use of the forward slash in precautionary statements is explained as follows in Annex 3 to GHS:

A.3.2.3.3: "When a forward slash or diagonal mark [/] appears in a precautionary statement text in column (2), it indicates that a choice has to be made between the phrases they separate. In such cases the manufacturer or supplier can choose, or the competent authorities may prescribe the most appropriate phrase(s)."

3. The forward slash has occasionally been used in cases where it does not indicate a choice between different phrases. According to Working Document ST/SG/AC.10/C.4/2012/20² and the related INF paper³, this was the case for P313 ('Get medical advice/attention'), P314 ('Get medical advice/attention if you feel unwell') and P315 ('Get immediate medical advice/attention'), as listed in the 4th revised edition of GHS. Therefore, it was proposed to remove "/attention" from these two precautionary statements.

¹ These P-statements apply to the following hazard classes: skin irritation (Cat. 2/3), eye irritation (Cat. 2A/2B), skin sensitisation (Cat. 1), germ cell mutagenicity (Cat. 1/2), carcinogenicity (Cat. 1/2), reproductive toxicity (Cat. 1/2), specific organ toxicity, repeated exposure (Cat. 1/2), gases under pressure (refrigerated liquefied gas).

² ST/SG/AC.10/C.4/2012/20, 'Use of the forward slash "/" in precautionary statements', transmitted by the expert from the United Kingdom on behalf of the informal correspondence group on Annexes 1-3 of the GHS.

³ UN/SCEGHS/24/INF.5, 'Amendments to physical hazard precautionary statements and use of the forward slash "/" in GHS precautionary statements', Transmitted by the expert from the United Kingdom on behalf of the informal correspondence group on Annexes 1-3 of the GHS

4. Upon further discussion during the 24th session of SCE GHS, this wording was ultimately retained.⁴ Instead, it was decided to add the following condition for use to the 5th revised edition of GHS:

Manufacturer/supplier or the competent authority to select medical advice or attention as appropriate

Issues

5. The newly inserted condition for use requires a distinction and a choice to be made between medical advice and medical attention. This has led to the following two issues:

- Lack of clarity on the meaning of the distinction between medical advice and medical attention in English
- Difficulty in translating this distinction to other languages

Lack of clarity on the distinction between medical advice and medical attention

6. The distinction between medical advice and attention in English can be interpreted in different ways. It may refer to seeking help by phone as opposed to seeking help in person (e.g. by going to a hospital or an emergency room), although this is not always understood as such. It is not clear whether it also refers to the difference between seeking help or advice from a physician as opposed to seeking help from a nurse or other medical professional.

7. As long as the intention behind the distinction is not clear, it is not possible to apply the condition for use and to accurately choose between the two phrases. Furthermore, it is questionable whether the distinction between medical advice and medical attention provides a clear benefit or only leads to confusion for duty holders, workers and consumers.

Difficulty in translating the distinction to other languages

8. It has also proven difficult to translate this distinction to other languages. In the French, Spanish and Russian language versions of GHS rev. 4, P313 and P315 only refer to 'consulting a doctor' (FR: Consulter un médecin; ES: Consultar a un médico; RU: Обратиться к врачу).

9. In GHS rev. 5, the French language version was changed to "Demander un avis medical/Consulter un médecin" ('Request medical advice/Consult a doctor') in order to create a distinction, albeit with a different connotation than in English. The Spanish and Russian language versions have remained unchanged, except for the addition of the condition for use, which has therefore become nonsensical (as it refers to a distinction that is not reflected in the actual P-statement).

⁴ ST/SG/AC.10/C.4/48/Add.1, 'Report of the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals on its twenty-fourth session', Addendum, Annex I, p. 7

	P313 in rev. 4	P313 in rev. 5	Condition for use in rev. 5
EN	Get medical advice/attention	<i>Unchanged</i>	Manufacturer/supplier or the competent authority to select medical advice or attention as appropriate
FR	Consulter un médecin	Demander un avis medical/Consulter un médecin	Il revient au fabricant/fournisseur ou à l'autorité compétente de sélectionner la mention (demander ou consulter) appropriée
ES	Consultar a un médico	<i>Change needed, but left unchanged</i>	El fabricante/proveedor o la autoridad competente seleccionarán, según proceda, el asesoramiento o la atención médica que hayan de prestarse.
RU	Обратиться к врачу	<i>Change needed, but left unchanged</i>	Изготовителю/поставщику или компетентному органу в соответствующих случаях надлежит определить необходимость обращения за консультацией или помощью к врачу.

10. In the European Union, the CLP Regulation is translated into all official EU languages. Various languages do not make a distinction between medical advice and medical attention (e.g. Portuguese: "Consulte um médico", Dutch: "Een arts raadplegen", Swedish: "Sök läkarhjälp"). As the intention behind the distinction is not clear in English, it is difficult to introduce the distinction in other languages.

Questions

11. This raises the following questions:

- What is the intended purpose of the distinction between medical advice and attention?
- Does this distinction bring a clear benefit to consumers and workers?
- How can the inconsistency in the different language versions be addressed?

12. In response to the last question, the following options have been identified:

Option 1: No distinction

Remove the condition for use, and:

Option 1A: Replace the forward slash in the English version by "or" ("Get medical advice or attention").

Option 1B: Replace the P-statement in English to "Contact a doctor" (in line with other language versions).

Option 2: Distinction in all languages

Option 2A: Retain the condition for use and introduce the distinction in all language versions. This would require clarifying the intention behind the distinction and subsequently changing the precautionary statement in numerous language versions (e.g. changing the Spanish version to 'Consultar/acudir a un médico'). This would not address the lack of clarity on the distinction in English.

Option 2B: As option 2A, while also changing/improving the P-statement in English (proposals from native speakers welcome).