

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**

12 November 2018

Thirty-sixth session

Geneva, 5-7 December 2018

Item 4 (b) of the provisional agenda

Hazard communication:

improvement of annexes 1 to 3 and further rationalization of precautionary statements

Proposal for the programme of work for the next biennium: review of precautionary pictograms related to existing precautionary statements and review of existing health hazard pictograms for comprehensibility on consumer products

**Transmitted by the International Association for Soaps, Detergents and
Maintenance Products (AISE), Responsible Packaging Management of
Southern Africa (RPMASA)**

Background

1. At its thirty-fifth session (4-6 July 2018) the Sub-Committee agreed that the precautionary pictograms proposed by AISE and the Japan Soap and Detergent Association (JSDA) could be included in Annex 3, Section 5 of the GHS as they were already in use in a number of countries with a high rate of understanding. See document ST/SG/AC.10/C.4/2018/5.
2. During the deliberations of the informal correspondence group, criteria had been discussed and agreed, on how to consider and select precautionary pictograms.
3. Some experts indicated that additional comprehensibility surveys were still ongoing, especially in developing countries to reflect the precautionary statement “Keep out reach of children” which could possibly be included in Annex 3 at a future date.
4. Additional precautionary pictograms are also already currently used by various sectors, and regions. Harmonisation of such pictograms at global level can help to foster a better understanding of the hazards for safe use of chemicals.
5. The informal correspondence group indicated its intention to continue discussing the use of precautionary pictograms as an alternative to written precautionary statements. This could be particularly helpful in communicating hazards and precautions for consumer products in developing countries, and regions where literacy rates are much lower than developed regions.

Discussion

6. Implementation of GHS labelling requirements for consumer products has resulted in a very large amount of information to be placed on the label (see informal document INF.5

(34th session) “10 years of GHS: More effective labelling for hazardous consumer products?”). This is particularly true where multilanguage labels GHS are required.

7. Major consumer research has shown that this leads to information overload for the target audience who as a result, often ignore the information (see reference above). A 2011 European Commission survey (Eurobarometer 360) found that only a quarter to half of users always read safety instructions before using a hazardous product for the first time (e.g. from 26% for daily used detergents up to 50% for insecticides and pesticides).

8. Consumers prefer simpler labels that contain less text, and provide the essential safe use information in a more focused way. For this purpose, safe use icons/precautionary pictograms are considered helpful and found to be generally well understood.

9. Several scientific studies have confirmed that graphical representations or pictograms can be recognized more quickly and have more positive impact than written warnings (Dorris & Purswell, 1978). Boelhouwer (2013) concluded that “inclusion of GHS hazard pictograms and precautionary pictograms to SDS and labels may benefit the user”.

10. Other considerations are:

(i) literacy level where globally about 14% of the world population cannot read (Unesco 2016), and many emerging economies in Africa have literacy rates below 50%. In Europe, 16.4% of people have literacy difficulties (about 55 million adults), and similarly, in US around 14% of adults demonstrated a “below basic” literacy level in 2013 (US Department of Education 2013).

(ii) there is an increased number of migrant workers using chemical products where they are not fluent in the official language/s of their residence country. Many of these are unskilled workers with low literacy levels thus a vulnerable part of the population.

11. As a conclusion, the use of simple, precautionary pictograms with demonstrated comprehensibility, can provide an equally if not more effective means to convey basic safe use information on hazardous chemicals than precautionary phrases.

12. The activities of the Correspondence Group on Improvement of Annexes 1 to 3 aim to further rationalize the precautionary statements that have to appear on labels.

Proposal

13. It is proposed to include the following activities in the work programme of the Informal Working Group on Improvement of annexes 1 to 3 for the next biennium (see UN/SCEGHS/32/INF.12).

Precautionary pictograms:

(i) Invite SC members to submit broadly used precautionary pictograms in their Sector or region to the Informal corresponding group for possible future inclusion in Annex 3 Section 5 of the GHS (Annex contains potential candidates). Results of comprehensibility studies with consumers and the public should support the SC evaluation.

(ii) Continue discussing on the use of precautionary pictograms included in Annex 3 Section 5 as an alternative to written precautionary statements (e.g. the precautionary pictogram “Keep out reach of children” together with or in place of P102).

Health hazard pictograms:

(iii) Review of health hazard pictograms for comprehensibility and continuing suitability, in light of the uptake of GHS into legislation spreading to many developing regions where growing millions of consumers with low literacy are exposed to hazardous chemicals, so need to be better informed of the hazards to health and the environment in order to use safely.

(iv) Explore possibilities to add more comprehensible hazard pictograms to communicate health hazards to the public, which are harmonised for global use. This would improve safety of consumer use of the increasing exports to developing regions, where contents of many labels are currently not clearly understood, as well as reduce health risks to the poor and disadvantaged as well as potential liability to Industry.

Annex

Examples of existing pictograms that could be considered in the evaluation of precautionary pictogram equivalent to the GHS precautionary statements

Example 1

A.I.S.E. Safe Use Icons for consumer products in use since 2004 (2014 <https://www.aise.eu/library/artwork/safe-use-icons---update-2014.aspx>)



Pictogram corresponding to P305 + P351 “IF IN EYES: Rinse cautiously with water for several minutes. Continue rinsing.”

Example 2



Pictogram corresponding to either P301+P310 “IF SWALLOWED: Immediately call a POISON CENTRE or doctor/physician” or P301+P312 “IF SWALLOWED: Call a POISON Centre or doctor/physician if you feel unwell”

Example 3

Pictograms in use in South Africa since end of 90's



Pictograms corresponding to:

P302 + P352 If on skin wash with plenty of water or P264 wash thoroughly after handling

P102 keep out of reach of children
