



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

Thirty-ninth session

Geneva, 8-10 July 2020

Item 3 (b) of the provisional agenda

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

Proposed changes to Annex 3 to prevent substances/mixtures classified as causing serious eye damage or eye irritation being transferred from the hand to the eye

**Transmitted by the expert from the United Kingdom on behalf of the
informal working group on improving annexes 1, 2 and 3 of the GHS***

Background

1. In line with its mandate for the 2019-2020 biennium the informal working group has taken forward work under its focus area (a): “to develop proposals to rationalise and improve the comprehensibility of hazard and precautionary statements for users, while taking into account usability for labelling practitioners.”
2. This document presents the outcome of work under item 3 in the group’s workplan (informal document INF.25, thirty-sixth session) where the issue was to review relevant precautionary statements and consider potential improvements that could be made to help reduce eye exposure from substances and mixtures classified as causing serious eye damage or eye irritation being transferred from the hand to the eye, a major route of exposure for the eye from such chemicals.

Discussion

3. The informal working group’s review of the precautionary statements in Annex 3 determined that several improvements could be made to the prevention precautionary statements in Table A3.2.2 that would help prevent the transfer of substances/mixtures from the hand to the eye. The proposed improvements are as follows:
 - (a) To amend the wording of the prevention precautionary statement P264 “**Wash... thoroughly after handling**” to specify the “hand” to help ensure

* 2020 (A/74/6 (Sect.20) and Supplementary), Subprogramme 2.

that users follow good hygiene practice and wash their hands after handling substances and mixtures to help prevent hand to eye transfer from occurring. In addition, and as provided in the current “conditions of use” (column 5) for the hazard classes and categories listed under P264, other parts of the body (in addition to the hand) may also need to be washed after handling substances and mixtures. To ensure that the part of the body can be specified, where appropriate, the group considered that the word “and...” should also be included in the precautionary statement within square brackets. Consequently, the group considered that the wording of P264 should be amended to read: **“Wash hands [and...] thoroughly after handling.”** with the necessary clarification provided in the “conditions of use” that should be amended to read: **“– text in square brackets to be used when the manufacturer/supplier or competent authority specify other parts of the body to be washed after handling”**.

- (b) The hazard classes and categories listed under the P264 precautionary statement currently include the hazard category of eye irritation (category 2). However, the working group considered that the hazard category of serious eye damage (category 1) should also be included under the P264 precautionary statement primarily on the grounds that it is not appropriate to provide a more stringent precautionary statement for a lower hazard category than for a higher hazard category of the same hazard class.
- (c) In addition to amending P264 as detailed in i and ii above, the working group considered that it is important to convey the message that people should not contact their eyes with their hands after handling substances and mixtures that may be damaging to the eye. Following a review of Table A3.2.2 the group concluded that, as there was no suitable precautionary statement that provides the required information, it would be necessary to introduce a new statement to rectify this information gap that would apply to the serious eye damage and eye irritation hazard categories. After consideration of several potential options, the group agreed that the most appropriate wording for the new prevention precautionary statement should be: **“Do not touch eyes.”** This statement is clear, succinct and easily translatable into French, German and Spanish. However, the group welcomes comments from Sub-Committee experts fluent in other languages to ensure that the meaning of the statement is also clearly understood in those languages.
- (d) Having consulted with the secretariat, the next available prevention precautionary statement code is **P265** and it is proposed that this code is allocated to the proposed new precautionary statement: **“Do not touch eyes.”**
- (e) To ensure communication of the full message of washing and keeping the hands away from the eyes when handling substances and mixtures that can cause eye damage, the group concluded that the combined precautionary statement of: P264 + P265 should also be introduced into Table A3.2.2. The combined statement would read: **“Wash hands [and...] thoroughly after handling. Do not touch eyes.”**
- (f) Consideration was also made regarding the potential amendment of P280 **“Wear protective gloves/protective clothing/eye protection/face protection/hearing protection/...”** to help address the hand to eye transfer issue for substances and mixtures classified as causing eye damage. The group concluded that due to the potential implications for the numerous other physical and health hazard classes and categories listed under P280, amending the wording of P280 was beyond the scope of the current work and was not be appropriate to be taken forward at this stage. However, the informal working group did consider that it would be appropriate to amend the “conditions of use” in P280 for the serious eye damage and eye irritation hazard categories only. The group concluded that for clarity the words *“protective gloves and”* should be included in the serious eye damage and eye irritation “conditions of use” entry that would read: **“– Specify protective gloves and eye/face**

protection. Manufacturer/supplier or the competent authority may further specify type of equipment where appropriate.”.

- (g) It was also noted that there were adjacent identical entries for the current “conditions of use” for some of the hazard classes and categories listed under P264 and for P280. The group considered these are unnecessary duplications that should be removed as part of the amendment to the conditions of use for P264 and P280 respectively.
4. In addition, the group also concluded that it was not necessary to amend any of the response precautionary statements in Table A3.2.3 in relation substances and mixtures that are classified as causing eye damage. The primary reasons for this are that:
- (a) The purpose of the review was to propose the necessary changes to ensure that hand contact with the eye is prevented for these chemicals; and
- (b) There are already several response precautionary statements available for situations where substances and mixtures that are classified as causing either eye irritation (i.e. P305; P317; P337; P338; P351) or serious eye damage (i.e. P305; P317; P338; P354) get into the eye.
5. Finally, the working group concluded that because the primary route of exposure for the eye is via contact from contaminated hands and that this route was much more significant than via the transfer of substances and mixtures from contaminated clothing, it was not necessary to make any changes to precautionary statements in relation to contaminated clothing for substances and mixtures that may cause eye damage (subject to the proposed improvements outlined in paragraph 3 being adopted).

Proposal

6. In Table A.3.2.2, Section 2, for the P264 entry:
- Under column 2 “Prevention precautionary statement (2)”:
- Delete: **“Wash ... thoroughly after handling.”**
 - Insert: **“Wash hands [and...] thoroughly after handling.”**
- Under column 3 “Hazard class (3)”, after line 4 for ‘Skin irritation (Chapter 3.2)’, insert a new line 5: “Serious eye damage (chapter 3.3)”.
- Under column 4 “Hazard category (4)”, after line 4 for ‘Skin irritation (Chapter 3.2)’, in the new line 5 for “Serious eye damage (chapter 3.3)”, insert: “1”.
- Under column 5 “*Conditions for use (5)*”:
- Merge the conditions of use entries for all the listed hazard classes and categories.
 - Delete: **“... Manufacturer/supplier or the competent authority to specify parts of the body to be washed after handling.”.**
 - Insert: **“- text in square brackets to be used when the manufacturer/supplier or the competent authority specify other parts of the body to be washed after handling.”.**
7. In Table A.3.2.2, Section 2, after the P264 entry:
- Under column 1 “Code (1)”, insert: “P265”.
- Under column 2 “Prevention precautionary statement (2)”, insert: **“Do not touch eyes.”**
- Under column 3 “Hazard class (3)”, line 1, insert: “Serious eye damage (chapter 3.3)”.
- Under column 3 “Hazard class (3)”, line 2, insert: “Eye irritation (chapter 3.3)”.

Under column 4 “Hazard category (4)”, line 1 for the serious eye damage entry, insert: “1”.

Under column 4 “Hazard category (4)”, line 2 for the Eye irritation entry, insert: “2/2A, 2B”.

8. In Table A.3.2.2, Section 2, for the P280 entry:

Under column 5 “*Conditions for use (5)*” for all the listed physical hazard entries¹, merge the conditions of use entries for all the listed physical hazard classes and categories.

Under column 5 “*Conditions for use (5)*” for the serious eye damage (chapter 3.3) and eye irritation (chapter 3.3) entries:

- Delete: **“Specify eye/face protection. Manufacturer/supplier or the competent authority may further specify type of equipment where appropriate.”**
- Insert: **“Specify protective gloves and eye/face protection. Manufacturer/supplier or the competent authority may further specify type of equipment where appropriate.”**

9. In Table A.3.2.2, Section 2, following the P231 + P232 entry:

- Under column 1 “Code (1)”, insert: “P264 + P265”.
- Under column 2 “Prevention precautionary statement (2)”, insert: **“Wash hands [and...] thoroughly after handling. Do not touch eyes.”**
- Under column 3 “Hazard class (3)”, line 1, insert: “Serious eye damage (chapter 3.3)”.
- Under column 3 “Hazard class (3)”, line 2, insert: “Eye irritation (chapter 3.3)”.
- Under column 4 “Hazard category (4)”, line 1 for the Serious eye damage entry, insert: “1”.
- Under column 4 “Hazard category (4)”, line 2 for the Eye irritation entry, insert: “2/2A, 2B”.
- Under column 5 “Conditions of use (5)”, merge lines 1 and 2 and insert: **“- text in square brackets to be used when the manufacturer/supplier or the competent authority specify other parts of the body to be washed after handling.”**

Action

10. The Sub-Committee is invited to agree the proposed changes to Annex 3 of the GHS as set out in paragraphs 6 to 9 of this document and as provided in full in informal document INF.4.

¹ Explosives (Unstable explosive and divisions 1.1, 1.2, 1.3, 1.4, 1.5); Flammable gases (Pyrophoric gas); Flammable liquids (Categories 1, 2, 3, 4); Flammable solids (Categories 1, 2); Self-reactive substances and mixtures (Types A, B, C, D, E, F); Pyrophoric liquids (Category 1); Pyrophoric solids (Category 1); Self-heating substances and mixtures (Categories 1, 2); Substances and mixtures which, in contact with water, emit flammable gases (Categories 1, 2, 3); Oxidizing liquids (Categories 1, 2, 3); Oxidizing solids (1, 2, 3); Organic peroxides (Types A, B, C, D, E, F); Desensitized explosives (Categories 1, 2, 3, 4).