

## 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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Geneva, 8-10 July 2020

Item 2 (i) of the provisional agenda

**Classification criteria and related hazard communication:  
other issues**

### **Comments on informal document INF.6 "Review of decision logics"**

#### **Note by the secretariat**

1. The secretariat thanks Germany for the corrections and proposals for improvement in informal document INF.6 and wishes to provide the following comments.

#### **General comments**

2. The secretariat welcomes proposals to simplify the decision logics but has concerns about the time needed to address all the proposals in informal document INF.6 before the end of the current biennium, bearing in mind that the Sub-Committee will not be in a position to take any formal decision in July.

3. The secretariat would like to recall that the review of the current decision logics in document ST/SG/AC.10/C.4/2020/3 was driven by the urgent need to solve a technical issue for the next revised edition of the GHS (as explained in ST/SG/AC.10/C.4/2019/9, submitted at the December 2019 session). The technical issue is solved with the proposal in ST/SG/AC.10/C.4/2020/3.

4. The secretariat notes that the review proposed by Germany in INF.6 is broader in scope. It addresses the design but also the content of the decision logics as well as the establishment of a set of guiding principles. Therefore, it should be considered by the Sub-Committee independently from the proposal in ST/SG/AC.10/C.4/2020/3.

5. Should the proposed review in INF.6 be intended to be completed during this biennium (to be taken into account in the next revised edition of the GHS) an official document detailing all amendments (including to the design and content of all decision logics) should be submitted for the December 2020 session.

#### **Specific comments**

##### **Corrections**

6. The secretariat will correct the proposal in ST/SG/AC.10/C.4/2020/3 to take account of the corrections listed in INF.6.

##### **Suitability of ISO 5807 for GHS decision logics**

7. During the preparation of document ST/SG/AC.10/C.4/2020/3, the secretariat did consider the suggestion made by Germany at the December 2019 session (...[to use] "the format of flowcharts based on appropriate ISO standards") and made some tests using the format prescribed by ISO 5807. These tests did not yield satisfactory results (in particular regarding the use of diamonds). Taking into account the results of these tests and also that

ISO standard addresses “Document symbols and conventions for data, program and system flowcharts, program networks charts and system resources”, the secretariat concluded that it was not suitable to be applied to the GHS decision logics in their current form without changing them significantly. Consequently, and in the absence of a formal decision or more detailed specifications from the Sub-Committee on a full review of the design and contents of the current decision logics, the secretariat decided to focus on solving the technical problem at stake and redraw them keeping their design and contents as close as possible to the existing ones.

8. If the Sub-Committee supports in principle the proposal by Germany to follow ISO 5807, the secretariat would like to invite Germany to provide all decision logics as amended in accordance with the revised design, together with a marked-up copy showing all changes to their content (unless the proposal is submitted in original English and French, in which case the marked-up copy will not be necessary). To avoid duplication of work, the secretariat will share the source files of the decision logics as amended in ST/SG/AC.10/C.4/2020/3 with the expert from Germany. These files should be used as the basis for the work.

#### **Paragraph 12**

9. The secretariat would prefer to keep the text in the decision logics as short as possible and therefore would not be in favour of adding “for classification” (e.g.: Substance/mixture for classification) on the first shape on top of each decision logic.

10. All decision logics are preceded by an introductory paragraph and the last sentence of that paragraph states “The classification is according to decision logic xxx”. The secretariat believes that repeating “for classification” on the decision logic would be redundant.

#### **Paragraph 15**

11. As indicated previously, a proposal addressing all decision logics will have to be submitted to the Sub-Committee for the December session in an official document if the proposed changes are intended to be considered for adoption before the end of the current biennium.

12. The secretariat would like to point out that, irrespective of the decision taken by the Sub-Committee for other decision logics, the layout of decision logics coming from transport regulations or the Manual of Tests and Criteria (e.g.: current figures in Chapter 2.1 and decision logics 2.8 and 2.15) will remain unchanged. On the contrary, the Sub-Committee may wish to consider whether other figures in the GHS may need to be revised (e.g. current figures 3.2.1, 4.1.1 and 4.1.2).

#### **Paragraph 16 (f) and example in annex 2 on the use of “off-page connectors”**

13. The secretariat does not support the use of “off-page connectors” as shown in the example in annex 2, nor the mention to a specific “part” of a decision logic in the sub-heading.

14. In addition, we could not find the proposed “off-page connector” in the version of ISO 5807 that was provided to us by ISO. In that version, the connector representing “an exit to, or an entry from, another part of the same flowchart, and used to break a line, and to continue it elsewhere” is depicted by a circle.

15. The secretariat believes that the current mention “(Continued on next page)” at the end of decision logics not fitting in one single page, already warns readers about the fact that part of the decision logic appears on the following page, takes less space than the proposed connector and does not require the introduction of additional sub-headings, nor references to “parts”. As a rule, the secretariat would like to avoid introducing additional sub-headings when they do not provide any additional value.

16. In addition, following deletion or addition of text in a chapter, more space may become available on a page, and a decision logic appearing over two pages in one edition of the GHS may need to be consolidated into one page on the next revised edition. This means that the headings referring to “part 1” or “part 2” would have to be constantly revised. Also, if a reference to “part 1” is inserted, a new sub-heading referring to subsequent parts would

have to be added in the following pages (the example provided in annex 2 of INF..6 does not address this case). This may also create confusion among users when a reference to a decision logic is made in other parts of the text (e.g: should a reference to a given decision logic be revised to refer to the applicable “part”? or should it be considered to be referring to the decision logic as whole?).

### **Requested action**

17. The secretariat invites the Sub-Committee to consider the comments above.
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