

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
(Seventh session, 14-16 July 2004,
agenda item 3,a)

DEVELOPMENT OF GUIDANCE FOR IMPLEMENTATION

Precautionary Statements : Comments on Document ST/SG/AC.10/C.4/2004/8

Transmitted by WHO on behalf of the International Programme on Chemical Safety (IPCS)¹

1. The purpose of this information note is to provide a short summary of the outcomes of an IPCS Workshop on the Globally Harmonized System for the Classification and Labelling of Chemicals (GHS), First Aid and Poisons Centre Training Materials. Issues which are relevant in finalising the guidance for implementation of a harmonized set of precautionary statements as part of the Globally Harmonized System for the Classification and Labelling of Chemicals (GHS) and implementation of the GHS in general are highlighted.

Background

2. The Workshop was organized on behalf of the IPCS by the Freiburg Poisons Centre, Germany, 23-25 June 2004. Seventeen experts participated in the Workshop from Poisons Centres in five WHO regions, along with experts involved in the development of the GHS and in the compilation of IPCS International Chemical Safety Cards. The Workshop was co-chaired by Dr Edith Clarke of the Ministry of Health, Ghana and Dr Martine Mostin of the Belgium Poisons Centre. Dr Wayne Temple, of the New Zealand National Poisons Centre, was the Rapporteur.

3. The objectives of the Workshop were:

- To raise awareness of the Globally Harmonized System of Classification and Labelling of Chemicals and the role that poisons centres and other emergency responders can have in the implementation of this new system.
- To discuss existing first-aid advice for chemical poisoning, to identify any chemicals for which specific first-aid should be recommended, to establish the degree of consensus for a harmonized set of first aid requirements for specific chemicals and for possible formats for this information.

4. In associated sessions, participants discussed the development of IPCS Training Materials for strengthening the operations of poisons centres. It was recommended that a chapter on the GHS be developed for inclusion in the training manual to assist in increasing awareness of the GHS among poisons centre professionals.

¹ *IPCS is a cooperative programme between the World Health Organization (WHO), the International Labour Organization (ILO) and the United Nations Environment Programme (UNEP)*

Outcomes

5. The Workshop recognized that all countries had made a commitment to implement the GHS by 2008 as part of their overall commitments to achieving the goals of the World Summit on Sustainable Development. It further recognised that precautionary statements are a key communication tool for implementation of the GHS enabling a link between the identified hazards of the chemical and the recommended measures that should be taken to minimise or prevent adverse effects resulting from exposures to hazardous chemicals from improper storage, handling and use.

- The Workshop supported the overall approach developed by the Correspondence Group of the UNSCEGHS on the development of precautionary statements covering prevention, response in the case of accidental spillage or exposure, storage and disposal, and the proposed way of linking these to the different hazard classes of the GHS.
- The Workshop confirmed that the proposed approach assisted in the increased understanding of the need for different types of precautions for different chemicals and their application in a clear and consistent manner.

6. The Workshop recognized that the proposed GHS precautionary statements had been developed by harmonizing statements currently in use, namely those from the IPCS International Chemical Safety Cards Compilers Guide, the American National Standards (ANZI Z129.1) and the EU system of safety phrases associated with its classification and labelling directives. A poisons centre is a specialized unit that advises on, or assists with, the prevention, diagnosis and management of poisoning. The structure and function of poisons centres varies around the world. At a minimum a poisons centre is an information service. Some poisons centres may also include a toxicology laboratory and/or a clinical treatment unit.

- The Workshop supported the proposal to include directions to call a poisons centre or doctor/physician and noted that this was consistent both with existing systems of precautionary statements and with the recognized functions of poisons centres to provide information and advice on the appropriate management of exposures to chemicals.

7. The Workshop acknowledged that there were different opinions of what constituted first-aid and agreed that the term included procedures necessary to sustain life or prevent other serious consequences but did not include the use of invasive procedures or specialized equipment. The Workshop acknowledged that sometimes the setting in which the exposure had taken place influences the type of first-aid generally used. For example, exposures to chemicals at sea or at other places remote from a hospital setting may require more specialist procedures to be given. In other cases supplementary advice may be needed before administration of basic first-aid procedures as the condition of the exposed person, including age, the estimated extent of exposure and the length of time that had elapsed since exposure sometimes influenced the advice to be given. One example of this additional advice would be whether transfer to a hospital was needed.

8. The Workshop discussed in detail the work of the Correspondence Group on Precautionary Statements of the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling (UNSEGHS) led by Germany and a paper prepared by IPCS on the availability and scope of first-aid advice for chemical poisoning.

9. The Workshop agreed a small number of minor modifications should be made to the existing proposal (ST/SG/AC.10/C.4/2004/8) to further increase internal consistency and to match the urgency of the response to the hazards involved. An annotated copy of the proposed Annex 3 of the GHS showing the changes recommended has been circulated to participants of the Workshop as part of the Workshop report for confirmation. The Workshop noted that following adoption of Annex 3 existing systems including the ICSC Compilers Guide will require consequential revision.

Key recommended changes to Annex 3 ST/SG/AC.10/C.4/2004/8

10. Of the changes recommended by the Workshop to the proposed Annex 3 (ST/SG/AC.10/C.4/2004/8) the following are considered the most important.

11. The Workshop noted that advice to induce vomiting was included in the proposals as a first-aid measure but that the means of doing so was not specified. Vomiting can be induced in various ways many of which can place the exposed person at greater risk than the ingested poison e.g. administration of salt water. Commonly labels and safety data sheets recommend syrup of ipecacuanha.

- The Workshop did not agree that the induction of vomiting should be included in the proposals.
 - The deletion of the recommended use of induction of vomiting is consistent with position statements of key professional groups such as the European Association of Poisons Centres and Clinical Toxicologists (EAPCCT) and the American Academy of Clinical Toxicology (AACT). *J Tox Clin Tox* (Vol. 42, No. 2, pp. 133–143, 2004).
 - Furthermore experience with the treatment of chemical poisoning over the last decade has shown that there was no evidence of clinical benefit to justify the routine use of syrup of ipecacuanha. This is consistent with the deletion of syrup of ipecacuanha from both the WHO List of Essential Medicines the WHO Model Formulary (April 2003).
 - A supplementary note regarding the deletion of recommendations to induce vomiting may be useful supplementary advice for manufacturers and suppliers.
- The Workshop noted that existing precautionary statements advise use of activated charcoal as a first-aid measure and this has been shown to be effective. The Workshop agreed with the proposed precautionary statements that it should not be specifically included but be one of the additional measures supported based on the further advice from a poisons centre or doctor/physician.
- The Workshop agreed that the use of oxygen as a means of resuscitation should be undertaken by trained personnel and for chemicals which are known to interfere with oxygen uptake and metabolism in the body. This is consistent with the IPCS Compilers Guide for ICSC.

12. After examining a number of international, regional and national contemporary sources of first aid advice for chemicals poisoning it was found that a small number of chemicals were commonly listed as having specific first-aid directions. On closer examination, while this was supported it was found that the existing references were not harmonized and that they included first-aid measures over and above the those in general use.

13. The Workshop acknowledged and supported the primary role of manufacturers and suppliers in both classifying the hazardous chemicals they produce and ensuring the correct labelling. However, the Workshop had reservations about this primary responsibility automatically extending to providing specialised first-aid or medical treatment advice. In view of this and the substantial variation found even among existing authoritative sources, the Workshop agreed that publication of a globally consensus view would be a useful supplementary reference to the GHS to prevent unnecessary risks and ineffective treatment.

- The Workshop agreed that harmonized special first-aid advice should be available for a limited number of chemicals such as cyanide, hydrofluoric acid, organophosphorus and carbamate pesticides and paraquat and this should be referred to from within the GHS.
- The Workshop recommended that IPCS should work in partnership with relevant professional bodies such as EAPCCT, AACT, Asia-Pacific Association of Medical Toxicologists (APAMT) to achieve a consensus on the chemicals to be included on the above list and to harmonise and update the specialist first-aid advice that should be given. If agreed by the UNSCEGHS this action should not delay adoption of the current proposals.

Other issues relating to implementation of the GHS

14. Given the discussions of the GHS, the existing role of poisons centres and the proposals to include them as key reference points in the implementation of the proposed precautionary statements the Workshop concluded that further specific consideration was needed to address the role of poisons centres in implementing the GHS. Four actions were identified:

- At a national level, among governments and bodies responsible for poisons centres so that they can consider the role that poisons centres will play as part of the GHS, and how these centres should be supported in this activity.
- At the professional level awareness and understanding of the GHS should be increased among professionals working in poisons centres so that they can understand and the basis for, and implications of, the hazard classification information provided.
- Appropriate information about chemicals should be provided by manufacturers and suppliers of hazardous chemicals to poisons centres so that these centres can more effectively provide specific advice on the management of chemical exposures and at the same time collect information about unexpected signs and symptoms being reported from specific chemicals in use.

15. The Workshop requested that further advice be obtained on an appropriate mechanism or forum for addressing the above general issues to ensure effective implementation of the proposals for precautionary statements.
