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**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-second session**

Geneva, 7-9 December 2016

Item 3 (b) of the provisional agenda

**Hazard communication issues:  
improvement of annexes 1 to 3  
and further rationalization  
of precautionary statements****Proposed changes to sections 2 and 3 of Annex 3 of the GHS****Transmitted by the expert from the United Kingdom on behalf of the  
correspondence group on improving annexes 1, 2 and 3 of the GHS<sup>1</sup>****Background**

1. In line with its mandate for the 2015-16 biennium<sup>2</sup> the correspondence group has taken forward work under its Workstream 2: “to consider giving more freedom to labelling practitioners and/or enforcement authorities in assigning precautionary statements and in the precise wording used in precautionary statements, including, to consider whether to address minor linguistic variations in hazard and precautionary statements which do not affect the obvious meaning of these statements and, if appropriate, to develop proposals.”
2. This paper builds on informal document INF.17 (thirtieth session) and presents the outcomes of the work of the correspondence group in the form of a draft proposal to amend sections 2 and 3 of Annex 3 of the GHS.

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2015–2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, paragraph 95, ST/SG/AC.10/C.4/60, annex III and ST/SG/AC.10/42, para. 15)

<sup>2</sup> Programme of work of the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals for 2015-2016 (refer to ST/SG/AC.10/C.4/56, annex III).

## Scope of the proposal

3. The proposal:
  - (a) Makes a number of changes to the tables in Section 2 of Annex 3 of the GHS, for some precautionary statements.
  - (b) Provides new text in Section 3 of Annex 3 “Use of precautionary statements” to:
    - (i) restructure the existing text (currently A3.3.1 to A3.3.5) to improve clarity without substantive loss of content. Under the heading “General precautionary measures” reference is now made to the general precautionary statements in Table A3.2.1, i.e. P101, P102 and P103, and to their use on consumer product labels as appropriate. The text also makes reference to the different sources of information available for consumers and for employers/workers; and
    - (ii) add new text under the sub-heading “Flexibility in the use of precautionary statements”. The new text encourages more concise, pertinent application of precautionary statements on the label. In particular, text has been added on omitting unnecessary statements, combining statements, allowing minor linguistic variations and prioritising medical response statements.
  - (c) Reformats A3.3.5 “Matrix of precautionary statements by hazard class/category”, in Section 3 of Annex 3 to consolidate hazard categories where the precautionary statements are the same but other hazard communication varies. The new layout provides a consistent presentation for each hazard category of all the label elements, giving in one line symbol (symbol and description), signal word and hazard statements (code and text), followed by the precautionary statements (code and text). This gives a better overview of how all the label elements reflect changes in hazard severity.

## Action requested

4. The Sub-Committee is invited to approve the proposed changes to Annex 3 of the GHS listed in paragraphs 7 to 9 below. In particular:
  - (a) Amendments to precautionary statement tables in Section 2 (refer to paragraph 7);
  - (b) New text on use of precautionary statements in Section 3 (refer to paragraph 8);
  - (c) New presentation for the precautionary statement matrix in Section 3 (refer to paragraph 9).

## Proposal

5. The list of amendments to Annex 3 of the GHS is provided in paragraphs 7 to 9 below.

6. For practical reasons, marked-up copies of the changes to the current text in Annex 3 of the GHS are circulated separately, in formal documents, as follows:

- (a) INF.3: Changes to Annex 3, Section 2
- (b) INF.3/Add.1: Changes to Annex 3, Section 3 (introductory text)
- (c) INF.3/Add.2: Changes to Annex 3, Section 3, lay-out of the matrix tables under A3.3.5 and consequential changes for consistency with amendments to Annex 3 Section 2.

## Annex 3, Section 2

7. Amend tables A3.2.1, A3.2.2, A3.2.3 and A3.2.5 as follows:

### Table A3.2.1:

- **P103**

Amend the text in column (2) to read as follows: “Read carefully and follow all instructions.”

*Justification:* The current P103, “Read label before use”, adds little value to the user. The new statement makes the reason for reading the label clearer for the consumer.

Add the following new condition for use in column (5) below “Consumer products”: “- omit where P202 is used.”

*Justification:* P202, “Do not handle until all safety precautions have been read and understood”, is a more specific and appropriate statement than P103 for the hazards which trigger it.

### Table A3.2.2:

- **P201**

Add the following condition for use in column (5) for all hazard classes except Explosives (chapter 2.1): “- omit for consumer products where P202 is used”

*Justification:* P202, “Do not handle until all safety precautions have been read and understood”, is more helpful than P201, “Obtain special instructions before use”, for consumer products and should take precedence where both are triggered.

- **P202**

Insert a new row for the hazard class: “Reproductive toxicity, effects on or via lactation (chapter 3.7)”, hazard category “Additional category”.

*Justification:* Consistency with P201 in covering all of the reproductive toxicity hazard class.

- **P231+P232**

Delete the entries for pyrophoric liquids (Chapter 2.9) and pyrophoric solids (Chapter 2.10).

*Justification:* P232 is not applicable to pyrophoric liquids and solids so the combination statement, P231+P232, should not be applied to these hazard classes.

**Table A3.2.3:**• **P301**

For the hazard class “Acute toxicity, oral (Chapter 3.1)”, add “, 5” in column (4).

*Justification:* Consistency with specification of exposure route for acute toxicity, inhalation (Chapter 3.1) and principle that medical response statements should be combined with a route of exposure or symptom.

• **P302**

For the hazard class “acute toxicity, dermal (Chapter 3.1)”, add “, 5” in column (4)

*Justification:* Consistency with specification of exposure route for acute toxicity, inhalation (Chapter 3.1) and principle that medical response statements should be combined with a route of exposure or symptom.

• **P312**

Merge the two existing rows for acute toxicity, oral (Chapter 3.1) and acute toxicity, inhalation (Chapter 3.1).

*Justification:* Consistent presentation with other entries in this table and removal of redundant rows.

• **P332**

Add the following new condition for use in column (5): “- *may be omitted if P333 is given on the label*”.

*Justification:* Consistency with condition for use for P332+P313.

• **P375**

For the hazard class “desensitized explosives (Chapter 2.17)”, add “, 4” in column (4).

*Justification:* Consistency, as P375 is applied to category 4 in the combination statement P371+P380+P375.

**Table A3.2.5:**• **P501**

For the hazard class “acute toxicity, inhalation (Chapter 3.2)” add “, 3” in column (4).

*Justification:* Consistency, as P501 is applied to category 3 in A3.3.5: the precautionary statement matrix.

**Annex 3, Section 3 (introductory text)**

## 8. Amend as follows:

A3.3.1.1 Add at the end of the existing text the current text of A3.3.1.6 as amended to read as follows:

“It will be subject to further refinement and development over time though the overall approach set out below will remain”.

A3.3.2.3 Renumber as new A3.3.1.2 and replace “Precautionary statements should appear on GHS labels along with” with “Precautionary statements should, as an important part of hazard communication, appear on GHS labels, along with”

*Consequential amendment:* current A3.3.1.2 to A3.3.1.5 become new paragraphs A3.3.1.3 to A.3.3.1.6.

A3.3.1.3 (former A3.3.1.2) In the first sentence replace “chemical product” with “substance or mixture” and in the second sentence replace “chemicals” with “substances or mixtures”.

A3.3.1.6 (former A3.3.1.5) Insert at the beginning of the paragraph the text of current paragraph A3.3.3.2, and amend to read as follows:

“A3.3.1.6 The understanding and following of precautionary label information, specific safety guidelines, and the safety data sheet for each product before use are part of occupational health and safety procedures. Consistent use of precautionary statements will reinforce safe handling procedures and will enable the key concepts and approaches to be emphasized in workplace training and education activities.”

A3.3.3.3 and A3.3.4.7 become new paragraphs A3.3.1.7 and A3.3.1.8.

A3.3.2 Amend to read as follows:

**“A3.3.2 Flexibility in the use of precautionary statements**

**A3.3.2.1 *Omission of precautionary statements where the advice is not relevant***

Subject to any requirements of competent authorities, those responsible for labelling may decide to omit other precautionary statements for a hazard class and category where the information is clearly not appropriate or is adequately addressed by other information on the label, taking into account the nature of the user (e.g. consumer, employers and workers), the quantity supplied, and the intended and foreseeable circumstances of use. Where a decision is made to omit a precautionary statement the supplier of the substance or mixture should be able to demonstrate that the precautionary statement is not appropriate for the intended and foreseeable use, including potential emergency situations.

**A3.3.2.2 *Combination or consolidation of precautionary statements***

A3.3.2.2.1 To provide flexibility in the application of precautionary phrases, combinations or consolidations of precautionary statements are encouraged to save label space and improve readability. The matrix and the Tables in Section 2 of Annex 3 include a number of combined precautionary statements. However, these are only examples and those responsible for labelling should further combine and consolidate phrases where this contributes to clarity and comprehensibility of label information.

A3.3.2.2.2 Combinations of precautionary statements can also be useful for different types of hazard where the precautionary behaviour is similar. Examples are P372+ P370+ P380 “**Explosion risk. In case**

of fire: evacuate area” and P210+ P403 “**Keep away from heat, sparks and open flame and store in a cool well ventilated place**”.

#### **A3.3.2.3 Variations of text not affecting the safety message**

A3.3.2.3.1 Subject to any requirements of competent authorities, the precautionary statements that appear on labels or in safety data sheets may incorporate minor textual variations from those set out in the GHS where these variations assist in communicating safety information and the safety advice is not diluted or compromised. These may include spelling variations, synonyms or other equivalent terms appropriate to the region where the product is supplied and used.

A3.3.2.3.2 In all cases, clear plain language is essential to convey information on precautionary behaviour. Furthermore, to ensure clarity of safety messages any variations should be applied consistently on the label and in the safety data sheet.

#### **A3.3.2.4 Application of precautionary statements concerning medical response**

A3.3.2.4.1 Where a substance or mixture is classified for a number of health hazards, this may trigger multiple precautionary statements relating to medical response i.e. calling a poison center/doctor/... (series P310-P312) and getting medical advice/attention (series P313-315). Usually, the label need only include one precautionary statement reflecting the response at the highest level with the greatest urgency, which should always be combined with at least one route of exposure or symptom (‘IF’ statement).

*NOTE: This does not apply to P314 “Get medical advice/attention if you feel unwell” nor P315 “Get immediate medical/advice attention” which are not combined with a separate “IF” statement and should appear without prioritisation.*

A.3.3.2.4.2 In general, the following principles should be applied:

- (a) Where the classification of a substance or mixture triggers several different precautionary statements a system of prioritisation should be applied. P310, “**Immediately call a POISON CENTER/doctor/...**”, should be prioritised over P311-P313; P311, “**Call a POISON CENTER/doctor/...**” over P312 and P313; and where only P312, “**Call a POISON CENTER/doctor/...if you feel unwell**”; and P313, “**Get medical advice/attention**”, are triggered, P311, “**Call a POISON CENTER/doctor/...**” should be used.
- (b) Routes of exposure, including P308 “**IF exposed or concerned**”, may be combined when triggered with a medical response statement. If the response statement is triggered with three or more routes of exposure then P308 may be used instead. However, relevant “IF” statements describing symptoms (e.g. P332, P333, P337, P342) should be included in full. If a route of exposure is triggered multiple times it should only be included once.

For example:

- (i) if P301 and P305, “**IF SWALLOWED:**” and “**IF IN EYES:**”, are triggered with P313, “**Get medical advice/attention**”, and P312, “**Immediately call a POISON CENTER/doctor/...if you feel unwell**”, then P301 + P305 + P311, “**IF SWALLOWED OR IN EYES: Call a POISON CENTER/doctor/...**”, should appear.
- (ii) if P304, P302, P301 and P333, “**IF INHALED:**”, “**IF ON SKIN:**”, “**IF SWALLOWED:**” and “**If skin irritation or rash occurs:**”, are triggered with P310, “**Immediately call a POISON CENTER/doctor/...**”, and P311, “**Call a POISON CENTER/doctor/...**”, then P308 + P332 + P310, “**IF exposed or concerned or if skin irritation or rash occurs: Immediately call a POISON CENTER/doctor/...**”, should appear.
- (iii) if P305 and P302, “**IF IN EYES:**” and “**IF ON SKIN**”, are triggered with P310, “**Immediately call a POISON CENTER/doctor/...**”, P313, “**Get medical advice/attention**”, and P314, “**Get medical advice/attention if you feel unwell**”, then P303 + P302 + P310: “**IF IN EYES OR ON SKIN: Immediately call a POISON CENTER/doctor/...**”, and P314, “**Get medical advice/ attention if you feel unwell...**” should appear separately.

A3.3.3.1 Amend the second sentence to read as follows:

“To this end the needs of, and the information sources available to two groups of users should be taken into account: consumers and employers/workers.”

A3.3.3.2 Delete the table and amend the paragraph to read as follows:

“In addition to the appropriate precautionary statements in the matrix, taking into account the guidance in this section, the general precautionary statements laid out in Table A3.2.1 are appropriate for consumers and should also appear on GHS labels.”

A3.3.4 and A3.3.4.1 (new) Insert the following paragraphs:

**“A3.3.4 Matrix of precautionary statements by hazard class/category**

A3.3.4.1 This section sets out a matrix listing the recommended precautionary statements for each hazard class and hazard category of the GHS by type of precautionary statement (see A3.2.2.1). The matrix guides the selection of appropriate precautionary statements, and includes elements for all categories of precautionary action. All specific elements relating to particular hazard classes should be used. In addition, general precautionary statements not linked to a certain hazard class or category should also be used where relevant (see A3.3.3).”

Renumber the first two sentences of current A3.3.4.1 as new paragraph A3.3.4.2.

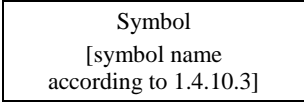
Current paragraphs A3.3.4.2, A3.3.4.3, A3.3.4.4 and A3.3.4.5 become new paragraphs A3.3.4.3, A3.3.4.4, A3.3.4.5 and A3.3.4.6, respectively.

**Annex 3, Section 3 (matrix tables under A3.3.5)**

9. For all the matrix tables in A3.3.5, amend the layout of the first half of the matrix as follows (*the layout of the part of the matrix containing the precautionary statements remains unchanged*):

Replace:

**HAZARD CLASS  
(GHS Chapter)**



Hazard category/categories	Signal word(s)	Hazard statement (s)		[Graphic symbol]
[hazard category number or designation]	[Signal word text]	[H code]	[Hazard statement text]	

With:

**HAZARD CLASS  
(GHS Chapter)**

Hazard category/categories	Symbol	Signal word(s)	Hazard statement (s)		
[hazard category number or designation]	[symbol name according to 1.4.10.3]	[Signal word text]	[H code]	[Hazard statement text]	

