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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

Twelfth session, 12(p.m.)-14 December 2006
Item 2(d) of the provisional agenda

**UPDATING OF THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

Revision of Annexes 1, 2 and 3 of the GHS

Transmitted by the representative from the European Chemical Industry Council (CEFIC)
on behalf of the correspondence group

Introduction

1. At the eleventh session of the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling, CEFIC was invited to lead a correspondence group comprising of the experts from Australia, Canada, Brazil, Japan, New Zealand, Sweden, United Kingdom, United States of America, the Secretariat, and the representatives of CEFIC, AISE, IPPIC, SDA, IFPCM and WHO, to review documents ST/SG/AC.10/C.4/2006/9 and -/2006/9/Add.1 on the reformatting of annexes 1, 2 and 3 of the GHS. The correspondence group was asked to check the proposed texts and propose amendments or corrections, as considered appropriate.

2. The secretariat prepared an updated version of document -/2006/9/Add.1 containing the text of -/2006/9/Add.1 as amended to reflect the agreements reached at the eleventh session of the Sub-Committee on documents ST/SG/AC.10/C.4/2006/8, -/2006/8/Add.1 and -/Add.2, UN/SCEGHS/11/INF.7, UN/SCEGHS/11/INF.15 and UN/SCEGHS/11/INF.24, and proposals for editorial amendments and corrections to the text of the annex on classification criteria (current Annex 2 of the GHS).

The updated version of –2006/9/Add.1 is reproduced as Addendum 1 to this document (ST/SG/AC.10/C.4/2006/20/Add.1).

The secretariat also prepared an updated version of ST/SG/AC.10/C.4/2006/8/Add.1.

Discussion

3. Contributions to the work of the correspondence group were provided by (in order of date received);

Secretariat	See ST/SG/AC.10/C.4/2006/20/Add.1
AISE	See Appendix 1
Canada	See Appendix 2
SDA	See Appendix 3
United Kingdom	See Appendix 4
WHO	See Appendix 5

4. The contributions received constituted a discussion on the purpose, content and layout of the Annexes. These represented a range of differing viewpoints.

5. In the time available between the eleventh session and the deadline for submission of documents for the December session it has not been possible to check the proposed texts and reach consensus on recommended corrections.

6. The amount of detailed analysis and thought that has been put into the contributions demonstrate a consensus on the importance of the work.

Proposal

7. It is proposed that the work of the correspondence group should continue and that the work should be added to the work program for the next biennium.

* * *

Appendix 1

Contribution from AISE

You have kindly taken account of many of the deficiencies in the proposed Annex 1 (revised document circulated by Bill Machin on August 2nd)¹. I think that there is room for further improvements.

The summary table that forms the proposed Annex 1 give guidance to the criteria for each hazard category in the GHS. It is based on Annex 2 in the GHS. The commendable objective is a more user-friendly annex that removes repetition and duplication in the current GHS Annexes.

The style of presentation of the hazard classification criteria in the proposed Annex 1 is not uniform (it follows the style of Annex 2 in the current GHS). Thus, the criteria may be given:

- as specified in the relevant chapter of the GHS;
- by reference to test methods (e.g. for some physical hazards);
- by summary or paraphrase of the criteria without qualification other than to cite specific sections of the relevant chapter. This applies in particular to relatively complex criteria for some hazards to human health. Although the motive is understandable, the result can be oversimplified and misleading.

In addition there are important omissions e.g. the criteria for acute toxicity refer to substances but not to mixtures.

I think the information on the classification criteria for carcinogens, mutagens and toxic to reproduction chemicals would be improved by making it closer to or identical with that in the relevant chapter of the GHS. Although that makes those sections longer I think it gives a more helpful summary. I have also added a section on the classification criteria for the acute toxicity of mixtures and have made other comments.

The summaries should not be used as a substitute for the information contained in the relevant chapters of the GHS. This point is made in A1.1.1. That said, I hope the changes I propose (see attached document) will make this part of the Annex more comprehensive and user-friendly.

I welcome your comments and those of our colleagues in this group.

¹ *Note by the Secretariat: Refers to Annex 1 "Classification summary tables" as reproduced in ST/SG/AC.10/C.4/2006/20/Add.1.*

Appendix 2

Contribution from Canada

We have had a close look at document ST/SG/AC.10/C.4/2006/9/Add.1 from the July meeting and have some initial thoughts.

It appears that the proposed revision moves away from original purpose of the annexes which was tools for training and education, towards tools that would be helpful for more experienced regulators. The existing annexes are being used in training/discussions regarding the GHS both within Canada and outside Canada and so we find them very helpful and useful as is. We would not like to see the original annexes dropped are replaced with the proposed annexes.

However, It should be possible to address the needs of both training/education and regulators. We joined the consensus around document ST/SG/AC.10/C.4/2006/8/Add.1 at the July meeting and agree that it could replace the existing Annex 3 in the Purple Book. We also recognize that proposed Annex 3 in -C.4/2006/9/Add.1 may be helpful for some. Having said this, there are some problems with the proposed annex, for example, TDG pictograms are GHS pictograms and should not be separated as proposed; the combination of standardized vs. guidance/recommendations; and quoting only codes for hazard and precautionary statements which will not be helpful to those not using codes.

Before doing a detailed review of the accuracy of the revised annexes, we would like to see the correspondence group agree on the purpose of the annexes, and the overall structure of the annexes. It is doubtful from our perspective that we will be able to meet the timelines for documents to the December meeting. However, we believe that it is critical that we take the time to achieve consensus around the annexes and validate their accuracy.

We look forward to working with the correspondence group on this important issue.

(Appendix 2, Canada (Cont.))

Initial analysis of document ST/SG/AC.10/C.4/2006/9/Add.1 (without verification of accuracy)

General Comments:

The codes (H and P) appear too often, in too many places (i.e. cross referenced in varying tables in varying annexes).

- any changes to coding numbers would require multitude of consequential amendments and higher risk of inaccuracies

New order of content as per -2006/9/Add.1 is:

- Classification summary tables
- Label Elements: GHS and TDG pictograms
- Label Elements: Codification of hazard statements
- Label Elements: Codification and use of precautionary statements
- Label Elements: Examples of precautionary pictograms
- Allocation of label elements

This is not a logical order for those learning the GHS. The original order is more logical. The codes seem to be more important than the understanding or use of the hazard or precautionary statements.

Reformatting and reconfiguration of annexes:

- Annexes lose their usefulness as a simple training and education tool and make it more a tool for experienced regulator and regulatee (industry).
- Target audience changes from "someone new to GHS" to one an experienced person. Perhaps both tools are needed, but one should not supplant the other.
- Annexes used to be "stand alones". They are now very intertwined with the rest of the GHS via reference and missing information /decodes to look up.

Consolidation of the precautionary statements: may be efficient in some cases, but in others (eg. P280- Wear protective gloves/protective clothing/eye protection/face protection), the original specific guidance related to the hazard class is lost, because of the now multiple options between the slashes.

GHS	-2006/8/Add.1	-2006/9/Add.1	Observations of -2006/9/Add.1	Suggestions
Annex 1 Allocation of label elements	not addressed	Becomes Annex 3 Allocation of Label elements	<p>(Proposed Annex 3)</p> <p>Text: new</p> <ul style="list-style-type: none"> - Concern over words: assigned, "shall be observed" - multiple references to other Annexes and Parts <p>Codes can be used in addition to the hazard statement in the SDS</p> <p>Table:</p> <ul style="list-style-type: none"> - appears to be the Matrix of all label elements - combines of standardized statements (hazard) and guidance/recommendations (precaution/code) - Transport notation is deleted. - TDG pictograms are GHS pictograms <p>Table shows only partial picture, because the H and P statements are coded. The reader must then refer to the other annexes to decode.</p> <p>The way this is written, this Annex cannot stand alone (used without the rest of the GHS).</p>	<p>Put Transport notations back on.</p> <p>Delete text A3.1.3 to A3.1.4.2. Not necessary.</p>

GHS	-2006/8/Add.1	-2006/9/Add.1	Observations of -2006/9/Add.1	Suggestions
Annex 2 Classification and labelling summary tables	not addressed	Becomes Annex 1 Classification summary tables	<p>Tables: Hazard communication elements removed. No labelling. Capability to see full picture "at glance" is lost. Proposed changes cause reduction in value.</p> <p>Initial reaction re. accuracy:</p> <ul style="list-style-type: none"> - page 8 (A1.2.11, Hazard category 2, (a)): 3m3 should be 3m³ - page 11 (A1.3.1): question accuracy translation of text into mathematical notation. GHS (page 282, Annex 2, A2.17, Category 3) says "between X and less than Y mg/kg". Changes not consistent e.g.: <ul style="list-style-type: none"> - ">5 but <50 mg/kg" - ">50 ≤ 300" - should it be "≥ X ≤ Y" ? - page 15, (A1.3.3, Category 2A, para. 3(b)): "is ≥ 3%", while GHS (page 288, Annex 2, A2.19, Category 2A, para 3 (b))says "is 3%". - page 18, A1.3.6: footnote a. This was originally attached to hazard comm. element. (GHS, page 292, Annex 2, A2.23, Cat. 2) Does it still work in this case? - move to change original bullets and dashes to lettering is inconsistent. 	<p>Keep Annex exactly like original Annex 2.</p> <p>It is a summary of GHS Parts 2, 3, 4 and is a useful reference and training tool.</p> <p>Proposed changes cause reduction in use value.</p> <p>Need to validate accuracy of math. notations.</p>

GHS	-2006/8/Add.1	-2006/9/Add.1	Observations of -2006/9/Add.1	Suggestions
Annex 3 Precautionary statements and precautionary pictograms	Annex 3- Section 1 Codification of hazard statements	Becomes Annex 2 Section 2 Codification of hazard statements		Needs to be reviewed again incorporating changes as per -2006/8/Add.1 (with July UNSEGHS revisions i.e. wording and coding changes), as well a other decisions for text changes e.g. target organ toxicity, etc.
Annex 3 Precautionary statements and precautionary pictograms	Annex 3- Section 2 Codification of precautionary statements Annex 3- Section 3 Use of precautionary statements	Becomes Annex 2 Section 3 Codification and Use of precautionary statements	At first looks like combining Sections, but there is Major change from -2006/8/Add.1: Matrix of precautionary statements by hazard class and category has been deleted. - This was not proposed in -2006/8/Add.1. It was present with codes added (in bold). - Reduction in pages (from 166 to 112 pages) as claimed in -2006/9, para. 8 is probably due to the deletion of this Matrix. As a result, text is different. Precautionary statements no longer linked with hazard statements. Codification Table A2.3.1 appears to be the same as proposed in -2006/8/Add.1. - However, cannot find the origin of all the "Conditions for Use" in the GHS, as found in Column 5. - Are some of them new? E.g." ... electrostatically sensitive...:	Keep Section separate, as proposed in -2006/8/Add.1. Needs to be reviewed again incorporating changes as per -2006/8/Add.1 (with July UNSEGHS revisions i.e. wording & coding changes), as well a other decisions for text changes e.g. target organ toxicity, etc. Need to verify statements for conditions for use. Keep Matrix of precautionary statements by hazard class and category - very useful table, and - proposed A2.3.1.2 states "The starting point for assigning precautionary statements is the hazard classification of the chemical product" Delete word "backslash" and replace with "slash".

GHS	-2006/8/Add.1	-2006/9/Add.1	Observations of -2006/9/Add.1	Suggestions
			- General precautionary statements for General Public has now been assigned to Consumer Products.	Ensure definition of Precautionary Statement is consistent throughout GHS. Proposal makes slight change but refers back to original version.
Annex 3 Precautionary statements and precautionary pictograms	Annex 3- Section 4 Examples of precautionary pictograms	Becomes Annex 2 Section 4 Examples of precautionary pictograms	same as -2006/8/Add.1	Keep, as per -2006/8/Add.1
		Annex 2 Section 1 GHS and TDG pictograms	Extra and new: was not proposed in -2006/8/Add.1 and not in GHS. Purpose seems to be codification of the GHS pictograms. Reference numbers have been assigned to each pictogram. Splitting of GHS and TDG – TDG is part of the GHS. No side-by-side comparison of pictograms. Additional wording taken (and repeats) from GHS Chapter 1.4. Table cross references hazards via pictogram.	Delete.

Appendix 3

Contribution from SDA

The Draft Proposal² was certainly a useful tool to stimulate our thinking on how the Annexes should be structured and what they should contain, so SDA appreciates your contribution to this effort.

Firstly, we offer a general comment on the work of the correspondence group. In a separate message to the Group, Canada noted their desire for the correspondence group to discuss and agree on the purpose of the annexes, and the overall structure of the annexes. We agree with Canada in this regard. Having before us a clear and concise statement of objective will facilitate our work in drafting restructured annexes and improve the efficiency of the process by which we will achieve consensus. Until a consensus is reached regarding the objective, we are operating under the assumption that the objective of the drafting process is to make the annexes easier to use, and less redundant among themselves and with the main body of the GHS text. With that in mind, we offer an alternative proposal for the structure of Annexes 1 to 3 (see attached proposed revision for one endpoint as an example). This is only a skeleton outlining the potential organization of information; it does not include any of the detailed content. Nonetheless, we hope it will stimulate conversation about the organization of this material.

The following are more detailed comments we'd like to offer, specifically on the draft Annex 1. Our comments build on some of the remarks made by Dr. How, below, but then take them in a slightly different direction.

We agree with Dr. How that it is a commendable objective to make the annex more user-friendly -- in particular as a training tool and reference for the practitioners who will be attempting to employ the GHS, in compliance with the applicable local regulations, to classify and label their substances and mixtures. Toward that end, we have tried to consider how such a person would use the annex.

We conclude that a user would rely on the annex as a "ready reference"; i.e., as a reminder of what has been learned already from the main body of the GHS text. A user would not/should not use the annex as the sole and complete basis for making classification and labelling decisions. If a user needed a refresher on the specific details related to one of the classes/categories, or if the product/situation was a more complex one, then the user should be directed to the appropriate section of the main text to read the detailed discussion associated with that hazard class. Further, it would be very helpful for the annex to contain the established criteria for each hazard class and category, alongside the standardized label elements associated with those classes/categories. The current version of Annex 2 contains this information and it would be a shame to lose this functionality.

In order to make it useful for this purpose, the annex should not contain all of the details and caveats contained in Parts 2, 3 and 4 of the GHS text. As Dr. How points out, a full description

² *Note by the Secretariat: Refers to ST/SG/AC.10/C.4/2006/20/Add.1.*

of all of the permutations of the criteria for some of the hazard classes is very complex. While he suggests making the information in the annex closer to or identical to what is present in the main text, we propose moving in a different direction. Including all such information in the annex would be redundant with then main body of the text and detract severely from its usefulness as a reference/training tool. At the same time, we share Dr. How's concern that, if it contains incomplete information, the Annex cannot appear to be a stand-alone tool that is a sufficient basis on which to make all classification and labelling decisions.

With all these thoughts in mind, we propose the following:

1. For each hazard class and category, include in the annex the established criteria associated with that class, along with the standardized label elements associated with it (i.e., the signal word, the symbol and the statement of hazard). Making all this information fit on the page in a readable fashion will require that the tables be presented in landscape layout, but use of landscape would not be unique to this annex (e.g., Annexes 3 and 5 employ this layout). Also, including the standardized label elements here would allow them to be removed from the proposed Annex 3. That would focus Annex 3 on the precautionary statement guidance and make the tables there a little less daunting to read.
2. Limit the description of the criteria for each category to those associated with substances and tested mixtures. When bridging principles or an additivity approach need to be employed, specifically refer the user of the annex back to the appropriate section of the main text of the GHS to ensure that none of the critical details associated with utilization of these (sometimes complex) approaches is overlooked. This should be in addition to the statement in paragraph A.1.1.1 of the Draft.

We have attached an example of how the tables in Annex 1 might be redone, as suggested above. In this example, we've addressed only a single hazard class, but the others could follow a similar pattern. Note: This example follows the structure proposed in the general comment, above.

We would be happy to hear from others regarding these suggestions. Please feel free to contact me with comments.

Proposed Reorganization of Contents of GHS Annexes 1, 2, and 3

Listed below are elements drawn from Draft Proposal - mostly tables containing the column headings shown below.

Additional text for the opening paragraphs of the Annexes can be drawn largely from the Draft Proposal.



Note: Hazard classes and hazard categories are the indexing elements common in all the annexes.

	Current GHS	Draft Proposal	SDA Alternative Proposal	Rationale for SDA Alternative Proposal
Annex 1	Allocation of Label Elements	Classification Summary Tables	Classification and Labeling Summary Tables	
	Hazard Classes Hazard Categories Symbols Signal Words Hazard Statements	Hazard Classes Hazard Categories Category Criteria	Hazard Classes Hazard Categories Category Criteria Symbols Signal Words Hazard Statements	Puts all standardized label elements in one place, along with the basic criteria to determine classification. Essentially combines current Annexes 1 and 2.
Annex 2	Classification and Labelling Summary Tables	Label Elements	Codification of Hazard Statements	
	Hazard Classes Hazard Categories Category Criteria Symbols Signal Words Hazard Statements	Symbols Symbol Reference Nos. Symbol Descriptions Hazard Classes Hazard Categories Hazard Codes Hazard Statements Hazard Classes Hazard Categories Precautionary Codes Precautionary Statements Hazard Classes Hazard Categories Conditions for Application Precautionary Pictograms	Hazard Codes Hazard Statements Hazard Classes Hazard Categories	This is a short Annex that achieves objective of codification of Hazard Statements and eliminates redundancy with current Annex 1.
Annex 3	Precautionary Statements and Precautionary Pictograms	Allocation of Label Elements	Precautionary Statements and Precautionary Pictograms	
	Hazard Classes Hazard Categories Symbols Signal Words Hazard Statements Precautionary Statements Precautionary Pictograms	Hazard Classes Hazard Categories Symbols Signal Words Hazard Codes Precautionary Codes	Precautionary Codes Precautionary Statements Hazard Classes Hazard Categories Conditions for Application Precautionary Pictograms	Achieves objective of codification of Precautionary Statements without creating redundancy with Annex 1.


Example Table Revision:

Annex 1: CLASSIFICATION SUMMARY TABLES

A1.3.2 Skin Corrosion/Irritation (See Chapter 3.2 for details)

Category	Criteria		Symbol	Signal Word	Hazard Statement
1 Corrosive (including sub-categories 1A, 1B, and 1C, which apply to only some authorities)	1. <i>For substances and tested mixtures:</i> (a) Human experience showing irreversible damage to the skin; (b) Structure/activity or structure property relationship to a substance or mixture already classified as corrosive; (c) pH extremes of ≤ 2 and ≥ 11.5 including acid/alkali reserve capacity; (d) Positive results in a valid and accepted <i>in vitro</i> skin corrosion test; or (e) Animal experience or test data that indicate that the substance/mixture causes irreversible damage to the skin in at least 1 of 3 tested animals following exposure of up to 4 hours. See Table 3.2.1 for details. 2. <i>If data for the complete mixture are not available, use approaches outlined in Chapter 3.2.</i>	GHS		DANGER	Causes severe skin burns and eye damage
		TDG		<i>no signal word</i>	<i>no hazard statement</i>

A1.3.2 Skin Corrosion/Irritation (See Chapter 3.2 for details)

Category	Criteria		Symbol	Signal Word	Hazard Statement
2 Irritant	<p>1. <i>For substances and tested mixtures:</i></p> <p>(a) Human experience or data showing reversible damage to the skin following exposure of up to 4 hours;</p> <p>(b) Structure/activity or structure property relationship to a substance or mixture already classified as an irritant;</p> <p>(c) Positive results in a valid and accepted <i>in vitro</i> skin irritation test; or</p> <p>(d) Animal experience or test data that indicate that the substance/mixture causes reversible damage to the skin following exposure of up to 4 hours:</p> <ul style="list-style-type: none"> - Mean value of $\geq 2.3 < 4.0$ for erythema/eschar or for oedema in at least 2 of 3 tested animals from gradings at 24, 48 and 72 hours after patch removal or, if reactions are delayed, from grades on 3 consecutive days after the onset of skin reactions; or - Inflammation that persists to the end of the observation period normally 14 days in at least 2 animals, particularly taking into account alopecia (limited area), hyperkeratosis, hyperplasia, and scaling; or - In some cases where there is pronounced variability of response among animals, with very definite positive effects related to chemical exposure in a single animal but less than the criteria above. <p>2. <i>If data for the complete mixture are not available, use approaches outlined in Chapter 3.2.</i></p>	GHS		WARNING	Causes skin irritation
		TDG	<i>not required</i>	<i>not required</i>	<i>not required</i>

Category	Criteria		Symbol	Signal Word	Hazard Statement
3 Mild irritant	<p>1. <i>For substances and tested mixtures:</i> Animal experience or test data that indicate that the substance/mixture causes reversible damage to the skin following exposure of up to 4 hours, mean value of $\geq 1.5 < 2.3$ for erythema/eschar or for oedema in at least 2 of 3 tested animals from gradings at 24, 48 and 72 hours after patch removal or, if reactions are delayed, from grades on 3 consecutive days after the onset of skin reactions.</p> <p>2. <i>If data for the complete mixture are not available,</i> use approaches outlined in Chapter 3.2.</p>	GHS	<i>no symbol</i>	WARNING	Causes mild skin irritation
		TDG	<i>not required</i>	<i>not required</i>	<i>not required</i>

Appendix 4

Contribution from United Kingdom

We are very grateful for contributions from Brenda, Kim, Mervyn and Rich, responding to the good work already done by Bill and others in industry.

Kim and Brenda suggest the Group should start by agreeing the purpose of the new Annexes 1 to 3 and their overall structure. We think the purpose of the annexes is to:

- Provide a reference source for the elements that make up the GHS, i.e. the hazard classes and categories, the label pictograms and signal words, and the hazard and precautionary statements
- Show how these elements are brought together to communicate the appropriate hazard information on chemical product labels.

Further, we suggest a structure for the new Annexes to replace the present Annexes 1 to 3 in the GHS. Our proposal draws on the helpful comments already made.

Implicit in any new structure is that it should, as far as possible, meet the needs of the different audiences (regulators, suppliers, consumers, workers), be coherent, concise (no repetition) and be generally 'user friendly'. If we do a good job the new annexes can meet all these needs.

However, we wonder whether, as jurisdictions move into implementation mode, there is a case for saying that the GHS should evolve to be a primarily a source for regulators and suppliers, and then a source for trainers (perhaps supplemented for training purposes by other documents from UNITAR).

In thinking about a new structure for the Annexes, we tried to work from first principles and a blank sheet - though as you will see we ended up with an outline similar to document -- /2006/9/Add.1 discussed in July.

To provide a reference source, the Annexes should start by listing the 'ingredients' of the GHS:

A: the hazard classes and categories (in order of appearance in the main text!) with their symbols, and a cross reference to the chapter in GHS setting out the criteria for each hazard category. [Note: our first thought was to also include the classification criteria for each category, but we note the comments from others that this would either just repeat the text of earlier chapters or would be necessarily an incomplete summary. Neither seems worthwhile.]

B: the pictograms listed by hazard class and category (with descriptions if needed. It may also be helpful to include a cross reference to other places where each pictogram is used.)

C: the hazard statements (plus codes), in code order, with the hazard classes and categories for which they are used.

D: the precautionary statements (plus codes), in code order, followed by any combination

statements, and conditions of use

E: the examples of precautionary pictograms

If we remove the lengthy classification criteria, so avoiding duplicating the text already in the substantive chapters of the GHS, then all this could be put into one annex, divided into 5 parts.

The second annex, in landscape format, would be a core list showing how these elements come together on the label. We suggest two possibilities. Both would list, for each hazard class and category, the pictograms, signal words, hazard statements and precautionary statements. This provides all the labelling information required at a glance. The difference between our suggestions lies in the balance we need to strike between saving pages and ease of reference.

1. The first proposal follows the revised paper 9³. To achieve single line presentation for each entry, with consequent savings in number of pages, the hazard and (particularly the) precautionary statements could be presented as their codes. This yields the benefit of showing all the label information concisely in one place, but we lose immediate accessibility since the precautionary statements are presented as codes rather than words. However, some may feel that the quick-access indexes already provided (C and D above) largely overcome this. Others may disagree.

2. The second suggestion is closer to the existing Annex 3 (suitably re-titled), with a few formatting changes to support effective labelling. For example, it would be improved if

- Pictograms for transport and supply could replace the current symbol.
- The words required on the label were presented in the correct font (for example bold) and given an equal importance to the precautionary statements.
- Codes should be included, but not in bold (as agreed in the meeting) which would help indicate that they are not compulsory elements in the label.

We agree with previous comments that differentiating between Transport and GHS in terminology is unhelpful. Might it clarify matters to use the terms "Transport" and "Supply" instead?

Further, we are not sure how helpful it is to divide transport hazards from supply hazards. Does it not make more sense to divide substances by the hazard they pose and present the labelling together?

In practice the user-friendliness of each of the outputs depends on how the information is actually presented on the page. We think there is scope for further improvement. Chloë Barnett has considerable skills in this respect, and is happy to advise.

Paper 8 revisions

In terms of the revised paper 8, we are concerned that adding horizontal lines suggests some precautionary statements should only be applied where the left hand column is filled.

³ *Note by the Secretariat: Refers to ST/SG/AC.10/C.4/2006/20/Add.1.*

Appendix 5

Contribution from WHO

We have reviewed the draft proposal⁴ and thank CEFIC for taking the lead on this issue. Codification of the statements should facilitate a move towards simplification and overall consistency within the system, helping not only classifiers but those using the statements to communicate effectively. However, we do not see great value in the codes taking the place of the phrases themselves or making them a formal part of the classification. Over the years our group of experts preparing International Chemical Safety Cards, a joint activity with ILO, has found great value in using codified statements to enable translation into multiple languages for example. However to cover the range of combination of statements their experience has also show that on many occasions strict adherence to a coded statement is not possible neither for the translation effort itself which is often needing to be verified by a native language speaker or from a technical "GHS" perspective. This is an issue that is currently being discussed by the expert group as they also familiarise themselves with the GHS and work to strengthen the consistency of their work with the GHS. The IPCS group will meet again in October 2006 and we will examine the paper for the December meeting further at that time.

We support the issue being placed on the agenda of the SCEGHS and look forward to continuing to participate in the correspondence group.

⁴ *Note by the Secretariat: Refers to ST/SG/AC.10/C.4/2006/20/Add.1.*