

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

Eighteenth session
Geneva, 9 – 11 December 2009
Item 2 (d) of the provisional agenda

UPDATING OF THE THIRD REVISED EDITION OF THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Revision of annexes 1, 2 and 3 of the GHS – Precautionary statements

Transmitted by the expert from the United Kingdom
on behalf of the informal correspondence group

Introduction

1. At its sixteenth session (December 2008), the Subcommittee approved the continuing work plan for the informal correspondence group on the improvement of Annexes 1, 2, and 3 of the GHS (see document ST/SG/AC.10/C.4/2008/CRP.3/Add.5). This stated that the group would:

“Pursue work to further improve Annexes 1, 2 and 3 of the GHS. The correspondence group will work on the following work streams, with the first given priority:

Workstream 1: to develop proposals to rationalize and improve the usability of hazard and precautionary statements, including proposals to eliminate redundancies among these statements

Workstream 2: to improve the presentation of Annexes 1 to 3 of the GHS, taking into account the intended audiences, uses and purposes of the GHS.”

2. In addition to this work, the informal correspondence group is considering a set of proposals from CEFIC members to make some revisions to clarify and rationalise the conditions of application for the precautionary statements for physical hazards.

3. This information document updates the Subcommittee on the informal correspondence group’s work on precautionary statements since the seventeenth session.

Background – GHS precautionary statements

4. Presently there are a number of factors limiting the usability of the GHS precautionary statements:

- (a) A high number of precautionary statements may be triggered for a substance or mixture, even with a relatively simple classification. Including all the statements triggered for a given chemical would arguably confuse the user and reduce the effectiveness of hazard and safety communication.
- (b) Selection of appropriate precautionary statements by manufacturers and suppliers can be difficult when a large number are triggered.
- (c) Different hazard classifications trigger similar but different precautionary statements, leading to arguably unnecessary small differences between precautionary measures recommended in different circumstances.

5. The correspondence group has been considering a number of approaches to rationalising and improving the usability of the GHS precautionary statements, which are described briefly below. Taking into account document UN/SCEGHS/16/INF.20 (Canada), the correspondence group agreed to prioritise the approaches in the order given below. Currently the focus of the correspondence group is on approach a..

6. However, other approaches to rationalising the precautionary statements will be considered as appropriate and any suggestions from the Subcommittee are welcomed.

Approaches under consideration

a. Rationalisation/reduction in number of precautionary statements

7. The correspondence group are considering how the existing precautionary statements could be combined or edited to reduce their overall number and complexity. The general principles adopted have been to explore whether a single statement can be used in cases where more than one statement recommends very similar or identical precautionary measures, or whether the existing statements can be made shorter or simpler. Document UN/SCEGHS/17/INF.14, presented at the June/July 2009 session, outlined initial proposals for how the precautionary statements could be rationalised.

b. Combination of precautionary statements

8. The correspondence group will explore proposals to include further combined precautionary statements in the tables A3.2.1 - A3.2.5. Such proposals will be considered when they can reduce the amount of text required on labels without detracting from clarity and comprehensibility.

c. Re-grouping of precautionary statements

9. Currently precautionary statements are grouped into 5 categories: General, prevention, response, storage and disposal. The correspondence group will consider whether the statements as listed in Tables A3.2.1 – A3.2.5 and the matrix in A3.3.5 could be reorganised in order to bring the groupings into closer correspondence with the headings in Safety Data Sheets (SDS). Such a revision may make the structure of SDS and the tables for selecting precautionary statements more consistent, and the links between the two clearer. It may also allow further reductions in the number of PS by allowing use of a single statement where more than one very similar statement is currently included in more than one category.

d. *Guidance for selection of precautionary statements*

10. The correspondence group will consider including further guidance to aid selection of appropriate precautionary statements in the GHS. In particular, it will consider whether further information can be included in the 'conditions for use' column in the table in Section 2 of Annex 3, to assist manufacturers and suppliers in choosing precautionary statements that are appropriate for the chemical they are supplying.

e. *Order of preference for precautionary statements*

11. Currently if the GHS ascribes a range of precautionary statements to a chemical, none is explicitly preferred over any other for inclusion on the label. However, A3.3.4.6 suggests that a hierarchy or order of preference could be applied to a given set of precautionary statements when several are triggered, recommending which statements in the group are most important for inclusion. Some specific proposals for precedence rules for specific precautionary statements have already emerged from the work on rationalisation of precautionary statements, but the correspondence group will consider further whether and how such an "order of preference" might be developed.

f. *'Signpost' statements*

12. The current approach of the GHS is to assume that labels should contain all the precautionary advice needed by users of the relevant products. However, the correspondence group will explore whether an alternative approach is possible, whereby labels may be used as a means to communicate only the most important safety messages, and include 'signposts' which refer to more detailed precautionary advice that is located elsewhere. The further information could be included for example in a safety data sheet or in instructions supplied with the product.

Progress since 17th session

13. Since the 17th session the informal correspondence group have held two telephone conferences (on 19th November and 1st December 2009) to discuss proposals for rationalising the existing list of precautionary statements in line with approach a. above. Discussions were based on the proposals made in document UN/SCEGHS/17/INF.14, presented at the last Subcommittee meeting, and have been focused on reaching agreement within the group on modified versions of those proposals.

14. Participants at the teleconferences have provisionally agreed a number of proposals to rationalise or edit the existing precautionary statements. However there remain a few proposals on which further discussion is needed, and this will be taken forward at the group's face-to-face meeting in December. Furthermore, some proposals raised specific physical hazard issues, which will be revisited when the group discusses proposals for amendments to precautionary statements for physical hazards (see below, para 16). A summary of discussions at the two teleconferences, together with a list of proposals considered, is given in Annex 1.

15. However, it should be noted that the overall impact of approach a. on reducing the number and complexity of PS on labels will be relatively small. Therefore it is likely that one or more of the remaining approaches b. to e. will be needed to make substantial progress on addressing the issues identified above with the precautionary statements. Work on these further approaches will therefore be taken forward by the group as soon as an agreed proposal is reached on approach a.

16. The informal correspondence group has not had the opportunity to discuss the proposals for amendments to the precautionary statements for physical hazards since the last Subcommittee meeting, but this work will be taken forward early in the New Year with the involvement of physical hazard experts.

Next steps

17. A meeting has been arranged of the correspondence group prior to the plenary Subcommittee meeting on Wednesday 9th December from 12:45 – 14:15. The Subcommittee will be updated verbally on the outcome of discussions at this meeting.

18. Subject to the group's reaching agreement on a set of proposals to rationalise the precautionary statements, the informal correspondence group aims to present a formal proposal to the Subcommittee at its 19th session (June/July 2009). Subsequently the group will continue its work on approaches b. to e. above.

9. The correspondence group aims to take forward work on revisions to precautionary statements for physical hazards early in the New Year, following up on the proposals made in UN/SCEGHS/17/INF.14. The group will also aim to bring a proposal on this element of the work to the Subcommittee for its 19th session.

20. It was agreed at the December 2008 meeting of the Subcommittee that the correspondence group should also take forward work on Workstream 2 of the group's work plan, to improve the presentation of Annexes 1 to 3 of the GHS, though Workstream 1 (rationalisation of precautionary statements) should be given priority. The correspondence group therefore intends to take forward work on Workstream 2 once satisfactory progress has been made within Workstream 1.

Annex I

Summary of outcomes of teleconferences 19 November 2009/1 December 2009 of informal correspondence group on Annexes 1-3 of GHS

Teleconference participants (19 November 2009):

Pierre Cruse (UK), Kim Headrick (Canada), Brenda Everson (Canada), Kathy Landkrohn (USA), Helmut Fleig (IPPIC), Lennart Dock (Sweden), Marie-Noëlle Blaude (Belgium), Pierre Wolfs (EIGA), Richard Sedlak (SDA), Caroline Walsh (Ireland), Anja Klauk (ECHA), Paul Brigandi (USA).

Teleconference participants (1st December 2009):

Pierre Cruse (UK), Kathy Landkrohn (US), Deana Holmes (US), Maureen Ruskin (US), Mary Frances Lowe (US), Helmut Fleig (IPPIC), Lennart Dock (Sweden), Marie-Noëlle Blaude (Belgium), Caroline Walsh (Ireland).

Code	Precautionary statement	Issues identified prior to telecon	Proposed change discussed at telecon	Discussion/outcome of telecon 19 Nov. 2009/ 1 st Dec 2009
P101	If medical advice is needed, have product container or label at hand	None	None	Start of teleconference 19 November
P102	Keep out of reach of children	None	None	-
P103	Read label before use	Redundant – odd advice	Replace with: Read entire label before use	P103 is a statutory requirement for pesticides in some jurisdictions, so agreed to leave this statement as it is.
P201 P202	Obtain special instructions before use Do not handle until all safety precautions have been read and understood.	P201 not clear, and seems to be redundancy between the statements.	Replace with: Do not handle until all safety precautions have been read and understood	Both these statements triggered for CMRs. Agreed to leave these PS unchanged.
P210	Keep away from heat/sparks/open flames/hot surfaces. – No smoking.	None	None	-
P211	Do not spray on an open flame or other ignition source	None	None	-

Code	Precautionary statement	Issues identified prior to telecon	Proposed change discussed at telecon	Discussion/outcome of telecon 19 Nov. 2009/ 1 st Dec 2009
P220 P420	Keep/store away from clothing/.../combustible materials Store away from other materials	Apparent redundancy, though P220 is prevention, and P420 Storage at present. However some authorities require a separate 'storage and disposal' section of the label, in which case a storage statement is required.	Suggest delete 'store' in P220, to read P220 Keep/ store away from clothing/.../combustible materials.	Agreed that we should maintain a statement covering the storage precaution in the P400 series. Options considered to rationalise these statements included: - Delete '/store' from P220 so that the storage precaution is not duplicated. - replace P420 with 'Store away from clothing/.../combustible materials' to align wording with P220. Some participants (IE, IPPIC) felt that 'other materials' was not entirely clear in P420, however P420 is simpler than a slashed version (US) and also may need to be more stringent than P220 since storage is an uncontrolled environment (EIGA). Agreed to defer further discussion until physical hazard experts present. UK will also look at drafting additional text to clarify use of the 'slash' in the precautionary statements.
P221	Take any precaution to avoid mixing with combustibles/...	'any precaution' is not clear and seems redundant.	Replace with: Do not mix with combustibles	Agreed, though statement should read ' do not mix with combustibles/... '.
P222	Do not allow contact with air	None	None	-
P223	Keep away from any possible contact with water, because of violent reaction and possible flash fire	None	None	-
P230	Keep wetted with...	None	None	-

Code	Precautionary statement	Issues identified prior to telecon	Proposed change discussed at telecon	Discussion/outcome of telecon 19 Nov. 2009/ 1 st Dec 2009
P231	Handle under inert gas	None	None	-
P422	Store contents under...	None	None	-
P232	Protect from moisture	None	None	-
P233 P404	Keep container tightly closed Store in a closed container	Redundancy, though P233 is prevention and P404 is storage. In some cases, (e.g. Acute toxicity, inhalation cat 1) P233 comes under storage as combination statement P403+P233	No change, but consider note in conditions for use allowing omission of one if both triggered.	Not specifically discussed, though noted that may raise similar issues to P220/P420. Revisit when physical hazard experts present.
P234	Keep only in original container	None	None	-
P235	Keep cool	None	None	-
P240	Ground/bond container and receiving equipment	None	None	-
P241	Use explosion-proof electrical/ventilating/lighting/.../equipment	Any equipment used (electrical or non-electrical) should be explosion proof, so could be shorter	Instead use 'Use explosion proof ... equipment and systems'. May also specify that manufacturer/supplier or the competent authority to specify equipment.	Supported by the group but would need to be confirmed by physical hazard experts.
P242	Use only non-sparking tools	None	None	
P243	Take precautionary measures against static discharge	None	None	
P244	Keep reduction valves free from grease and oil.	Reduction valves: it is not clear and this statement should apply to all equipment that comes into contact with oxidizing gases	Replace with: Keep cylinder valves and pressure regulators free from grease and oil. [Leave this on the table for when we discuss PS for physical hazards]	EIGA argued the precaution should not be restricted to the equipment connected to the pressure receptacles, but should be more general. They propose an alternative version, 'Keep valves and fittings free from grease and oil'. Supported provisionally by the group but several participants wished to consult further with physical hazard/safety engineering colleagues.
P250	Do not subject to grinding/shock/friction	None	None	

Code	Precautionary statement	Issues identified prior to telecon	Proposed change discussed at telecon	Discussion/outcome of telecon 19 Nov. 2009/ 1 st Dec 2009
P260 P261	Do not breathe dust/fume/gas/mist/vapours/spray Avoid breathing dust/fume/gas/mist/vapours/spray	Redundancy – same action required. ‘Do not create dust’ etc. would also be more appropriate than ‘do not breathe...’ in some situations, where this is practicable.	Delete P261 – replace with single statement, Do not create/ breathe dust/fume/gas/mist/vapours/ spray. Manufacturer supplier should specify practicable precaution as well as applicable conditions.	Several participants (IE, US, BE) felt that ‘do not create’ was not appropriate for a PS as it is more a risk management measure than safety precaution to be put on label. Generally agreed two levels of stringency could be of use, though in some sectors only P260 would be used (EIGA). Agreed that the statements should remain as they are, although there is a clear precedence so when both triggered, only P260 applies.
P262	Do not get in eyes, on skin, or on clothing	None	None	-
P263	Avoid contact during pregnancy/ while nursing	None	None	-
P264	Wash... thoroughly after handling	None	None	-
P270	Do not eat/drink or smoke when using this product	None	None	-
P271	Use only outdoors in a well-ventilated area	None	None	-
P272	Contaminated work clothing should not be allowed out of the workplace.	None	None	-
P273	Avoid release to the environment	None	None	-
P280 P281	Wear protective gloves/protective clothing/eye protection/face protection Use personal protective equipment as required	Redundancy, and P281 not very specific.	Replace with one statement: Wear protective gloves/protective clothing/eye protection/face protection/... Manufacturer/supplier or the competent authority to specify appropriate personal protective equipment.	Agreed by telecon participants.
P282	Wear cold insulating gloves/face shield/eye protection	None	None	-
P283	Wear fire/flame resistant/retardant clothing	None	None	-

Code	Precautionary statement	Issues identified prior to telecon	Proposed change discussed at telecon	Discussion/outcome of telecon 19 Nov. 2009/ 1 st Dec 2009
P284 P285	Wear respiratory protection In case of inadequate ventilation wear respiratory protection	Redundancy. Also, not clear why P285 appropriate for respiratory sensitisers only rather than P284 – it is also a lot less simple than P284 and it may be difficult for users to judge whether there is ‘adequate’ ventilation. However for some chemicals, e.g. decorative paints, P284 would be over precautionary. Therefore want optionality.	Replace P285 with P284: Wear respiratory protection. For respiratory sensitisers consider Wear respiratory protection/ In case of inadequate ventilation wear respiratory protection. Another option would be to use square brackets to indicate that the contents is optional depending on the context.	A number of options discussed including: - Consolidate these statements into a single statement applicable to both respiratory sensitisers and acute tox, inhalation, with either slash formulation or use of square brackets indicating that ‘in case of...’ is optional - Use only P284 but include ‘to be used in case of inadequate ventilation’ in the conditions for use column. - leave statements as they are with P284 applicable to acute tox, inhalation and P285 to respiratory sensitisers. - leave statements as they are with P284 applicable to acute tox, inhalation and P285 to respiratory sensitisers with the use of square brackets indicating that “in case of...” is optional (BE). Consensus not reached on best option. Some participants (US) felt that clear trigger conditions based on hazard class for P284/285 would be preferable (as at present). Other participants (IPPIC) felt the applicability of the statements could cut across hazard classes (e.g. P284 would be more appropriate for some respiratory sensitisers such as isocyanates), so more flexibility is

Code	Precautionary statement	Issues identified prior to telecon	Proposed change discussed at telecon	Discussion/outcome of telecon 19 Nov. 2009/ 1 st Dec 2009
				desirable. Agreed that to progress the issue UK would put the different proposals in writing and circulate to the group for further scrutiny. [see proposals page 9, not further discussed] End of teleconference 19th November 2009.
P301 P302 P303 P304 P305 P306	IF SWALLOWED: IF ON SKIN: IF ON SKIN (or hair): IF INHALED: IF IN EYES: IF ON CLOTHING:	None	None.	Start of teleconference 1st December 2009
P307 P308 P309 P307 + P311 P308 + P313 P309 + P311	IF exposed: IF exposed or concerned: IF exposed or if you feel unwell: IF exposed: Call a POISON CENTER or doctor/physician + IF exposed or concerned: Get medical advice/attention + IF exposed or if you feel unwell: Call a POISON CENTRE or doctor/physician	Apparent redundancy. However may want to retain P308 for CMRs and separate PS for cat 1 and 2 STOT. No reduction in words simply by reducing from three pre-fixes to two. However could shorten P309 + P311.	Replace P309 with IF you feel unwell; , retain P307, P308.	Agreed that ‘...if you feel unwell’ is redundant since symptoms may be delayed, and medical attention should be sought in case of exposure in any case. Agreed P307 should be used to apply to both STOT SE cat 1 and cat 2, and consequently that P309 is removed.

Code	Precautionary statement	Issues identified prior to telecon	Proposed change discussed at telecon	Discussion/outcome of telecon 19 Nov. 2009/ 1 st Dec 2009
P310 P311 P312 P313 P314 P315	Immediately call a POISON CENTER or doctor/physician Call a POISON CENTER or doctor/physician Call a POISON CENTER or doctor/physician if you feel unwell Get medical advice/attention Get medical advice/attention if you feel unwell Get immediate medical advice/attention	Redundancy, esp. as regards 310-312 and 313-315. Not all jurisdictions have Poison Centres which can be called by workers/ members of the public. Need flexibility for manufacturers/suppliers to specify source of first line medical advice.	Use only: P310, P311, P312 Immediately call a POISON CENTER/ or doctor/physician/... , P311 Call a POISON CENTER/ or doctor/physician/... and Call a POISON CENTER/ or doctor/physician/... if you feel unwell. (etc.) Add note in column 5, “manufacturer/supplier or the competent authority to specify the appropriate source of medical advice.”	Agreed ‘physician’ should be deleted since ‘doctor’ is more common usage in US and British English (and e.g. French only uses one term, ‘médecin’). Agreed that P310, P311 and P312 should use slashed formulation as proposed. However this proposal should be cleared with WHO before making a formal proposal. Discussion as to whether it was necessary to have two groups of formulations, ‘call a POISON CENTER...’ etc. and ‘Get medical advice/attention...’ etc. Although there seems to be some redundancy agreement was not reached for further rationalisation as some participants (US, UK, BE) felt the statements may have apparently different functions - ‘Call a POISON CENTER’ is primarily (though not exclusively) used for toxicity hazard classes whereas ‘get medical advice...’ applies to cases where other sources of medical advice may be appropriate (e.g. skin irritation, eye irritation, CMRs). However, there may be further scope for rationalisation where more than one formulation is being triggered on the same label. Agreed UK would look into the issue and provide some

Code	Precautionary statement	Issues identified prior to telecon	Proposed change discussed at telecon	Discussion/outcome of telecon 19 Nov. 2009/ 1 st Dec 2009
				examples.
P320 P321 P322	Specific treatment is urgent (see ... on this label) Specific treatment (see ... on this label) Specific measures (see ... on this label)	Redundancy: no real difference between 'treatment' and 'measures'.	Replace 'specific measures' (currently for Acute toxicity dermal, cat 1-4, with note ' <i>if immediate measures such as specific cleansing agent is advised</i> ') with P321 specific treatment (see ... on this label) .	GHS does not seem to make a principled distinction between 'treatment' and 'measures'. Agreed that P322 should be removed and P321 should be extended to hazard categories previously covered by P322 (Acute tox, dermal, 1-4.). The note ' <i>if immediate measures...</i> ' should continue to apply to those hazard categories.
P330	Rinse mouth	None	None	-
P331	Do NOT induce vomiting	None	None	-
P332 P333 P332 + P313 P333 + P313	If skin irritation occurs If skin irritation or rash occurs If skin irritation occurs: Get medical advice/attention If skin irritation or rash occurs: Get medical advice/attention	Clearly don't need both of these if both triggered.	Replace P332 with: P333 If skin irritation or rash occurs . However could consider later whether a note in 'conditions for use' indicating that second combination statement renders the first redundant is more appropriate way to deal with this.	Agreed that both statements should remain, but there should be a note in 'conditions for use' stating that where both are triggered, P333 should take precedence over P332.
P334	Immerse in cool water/wrap in wet bandages	None	None	-
P335	Brush off loose particles from skin	None	None	-
P336	Thaw frosted parts with lukewarm water. Do not rub affected area.	None	None	-
P337	If eye irritation persists:	None	None	-
P338	Remove contact lenses, if present and easy to do. Continue rinsing.	None	None	-

Code	Precautionary statement	Issues identified prior to telecon	Proposed change discussed at telecon	Discussion/outcome of telecon 19 Nov. 2009/ 1 st Dec 2009
P340 P341 P342 P304 + P340 P304 + P341 P342 + P311	Remove victim to fresh air and keep at rest in a position comfortable for breathing If breathing is difficult, remove victim to fresh air and keep at rest in a position comfortable for breathing. If experiencing respiratory symptoms: IF INHALED: remove victim to fresh air and keep at rest in a position comfortable for breathing. IF INHALED: if breathing is difficult, remove victim to fresh air and keep at rest in a position comfortable for breathing. If experiencing respiratory symptoms: call a POISON CENTRE or doctor/physician	Respiratory sensitisers cat 1 trigger P304+P341 and P342 + P311 . However, this combination seems confusing and unnecessarily long. The phrase ‘respiratory symptoms’ may not be clear. ‘Person’ is better than ‘victim’.	Delete P342. Replace P341 with If breathing is difficult, remove victim person to fresh air and keep at rest in a position comfortable for breathing. Instead of P342+P311, add P311 to combined statement P304+341 to form a single statement: IF INHALED: If breathing is difficult, remove person to fresh air and keep at rest in a position comfortable for breathing. Call a POISON CENTER/doctor/physician/...	Some participants (IPPIC, SE, IE) felt there was some redundancy since P304+P341 and P342 + P311 are both triggered for respiratory sensitisers suggesting that a single shorter statement should suffice. However, no clear consensus was reached to change in a particular way as some participants (US, UK) felt that while P304 + P341 is intended to cover an acute asthma attack for someone already sensitised, ‘respiratory symptoms’ may cover the case where more chronic health effects such as shortness of breath or coughing are experienced. Agreed that UK should draft some further options for rationalisation in more detail for next meeting.
P350 P351 P352 P353 P302 + P350 P302 + P352 P303 +	Gently wash with plenty of soap and water. Rinse cautiously with water for several minutes. Wash with plenty of soap and water Rinse skin with water/shower IF ON SKIN: Gently wash with plenty of soap and water. IF ON SKIN: Wash with plenty of soap and water. IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing.	P351 should be kept separate as applies specifically to eyes, and no reason to remove P353 since this will not reduce overall number/length of statements on label. Reference to soap should be more flexible - soap may not always be available and encouraging people to use “soap and water” could discourage quick action. Main issue re	See proposals, page 16 below.	Agreed that in most cases the correct response is to wash with water, and that ‘gently’ is not appropriate in cases of highly toxic chemicals. Thus, “soap and” can be removed. However in some limited cases other agents or materials may be necessary in addition to, or instead of water. Agreed that a variant of proposal 1 (see p.16 below) should be proposed, whereby the statement ‘IF ON SKIN: wash with plenty of water/...’ is

Code	Precautionary statement	Issues identified prior to telecon	Proposed change discussed at telecon	Discussion/outcome of telecon 19 Nov. 2009/ 1 st Dec 2009
P361 + P353	Rinse skin with water/shower.	redundancy is that P302 + P350 and P302 + P352 could both be triggered (e.g. a chemical is skin irritant/sensitiser and acute tox, dermal cat 1 or 2).		assigned to acute tox, dermal 1-4, skin irritation 2, and skin sensitisation, but a note is given in conditions for use stating that the manufacturer/supplier may specify a cleansing agent if appropriate or in exceptional cases recommend alternative agent(s) where water is clearly inappropriate’.
P360	Rinse immediately contaminated clothing and skin with plenty of water before removing clothes	None	None	-
P361 P362 P363 P303 + P361 + P353	Remove/take off immediately all contaminated clothing Take off contaminated clothing and wash before reuse. Wash contaminated clothing before reuse. IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower.	Redundancy, same can be accomplished with fewer statements. However, need to bear in mind that some clothing needs to be taken off immediately, whereas in other cases it could be taken off at end of shift. P362 only for skin irritation cat 2, whereas skin sensitisation cat 1, 2, 3 gets P363 – is it necessary to have this difference? No need to have both ‘remove’ and ‘take off’.	See proposal below, pages 17-18.	In case of protective clothing used e.g. in spraying of pesticides, not practical to require that clothing be taken off immediately, although ‘wash before reuse’ would be appropriate. However, the statement ‘take off contaminated clothing and wash before reuse’ would normally occur after ‘IF ON SKIN: Wash with plenty of soap and water’ in which case (if the contaminant is on the skin) the contaminated clothing should be removed. (N.b. it is proposed above that “soap and” is removed). All agreed change proposed in Option 1 (page 18 below) agreed, whereby Acute toxicity, dermal 4 and Skin sensitisation, 1A, 1B, 2

Code	Precautionary statement	Issues identified prior to telecon	Proposed change discussed at telecon	Discussion/outcome of telecon 19 Nov. 2009/ 1 st Dec 2009
				receive P362 'Take off contaminated clothing and wash before reuse' instead of P363 'wash contaminated clothing before reuse'. End of teleconference 1st December 2009.
P370	In case of fire:	None	None	-
P371	In case of major fire and large quantities	None	None	-
P372	Explosion risk in case of fire	None	None	-
P373	DO NOT fight fire when fire reaches explosives	None	None	-
P374	Fight fire with normal precautions from a reasonable distance.	None	None	-
P375	Fight fire remotely due to risk of explosion	None	None	-
P376	Stop leak if safe to do so	None	None	-
P377	Leaking gas fire: Do not extinguish, unless leak can be stopped safely	None	None	-
P378	Use... for extinction	'Extinction' not the clearest phrase here	Replace with P378: Use ... to extinguish	-
P380	Evacuate area	None	None	-
P381	Eliminate all ignition sources if safe to do so	None	None	-
P390	Absorb spillage to prevent material-damage	None	None	-
P391	Collect spillage	None	None	-
P401	Store...	None	None	-
P402	Store in a dry place	None	None	-
P403	Store in a well-ventilated place	None	None	-
P404	Store in a closed container	See P233	see P233.	-
P405	Store locked up	None	None.	-
P406	Store in corrosive resistant/...container with a resistant inner liner.	None	None	-
P407	Maintain air gap between pallets	None	None	-
P410	Protect from sunlight	None	None	-
P411	Store at temperatures not exceeding ...°C/...°F	None	None	-

Code	Precautionary statement	Issues identified prior to telecon	Proposed change discussed at telecon	Discussion/outcome of telecon 19 Nov. 2009/ 1st Dec 2009
P412	Do not expose to temperatures exceeding 50°C/122°F	None	None	-
P413	Store bulk masses greater than ...kg/...lbs at temperatures not exceeding ...°C/...°F	None	None	-
P420	Store away from other materials	See P220	see P220	-
P422	Store contents under...	See P231	see P422	-
P501	Dispose of contents/container to...	None	None	-

Proposals for P284/ P285

Current position:

P284	Wear respiratory protection	Acute toxicity, inhalation (chapter 3.1)	1, 2	Manufacturer/supplier or the competent authority to specify equipment
P285	In case of inadequate ventilation wear respiratory protection	Respiratory sensitization (chapter 3.4)	1, 1A, 1B	Manufacturer/supplier or the competent authority to specify equipment

Option 1

P284	[In case of inadequate ventilation] wear respiratory protection	Acute toxicity, inhalation (chapter 3.1)	1, 2	Manufacturer/supplier or the competent authority to specify equipment. Text in square brackets [] to be used where appropriate.
		Respiratory sensitization (chapter 3.4)	1, 1A, 1B	

Option 2

P284	Wear respiratory protection	Acute toxicity, inhalation (chapter 3.1)	1, 2	Manufacturer/supplier or the competent authority to specify equipment. To be used where ventilation is inadequate.
		Respiratory sensitization (chapter 3.4)	1, 1A, 1B	

Option 3

P284	Wear respiratory protection	Acute toxicity, inhalation (chapter 3.1)	1, 2	Manufacturer/supplier or the competent authority to specify equipment
P285	[In case of inadequate ventilation] wear respiratory protection	Respiratory sensitization (chapter 3.4)	1, 1A, 1B	Manufacturer/supplier or the competent authority to specify equipment Text in square brackets [] to be used where appropriate.

Proposals for P350 – P353

Summary of current position:

Acute toxicity, dermal 1, 2	Acute toxicity , dermal 3, 4	Skin irritation 2	skin sensitisation
P302 + P350 IF ON SKIN: Gently wash with plenty of soap and water.	P302 + P352 IF ON SKIN: wash with plenty of soap and water.		

Proposal 1:

Acute toxicity, dermal 1, 2	Acute toxicity , dermal 3, 4	Skin irritation 2	skin sensitisation
P302 + P352 (modified) IF ON SKIN: Wash with plenty of water.			

Proposal 2:

Acute toxicity, dermal 1, 2	Acute toxicity , dermal 3, 4	Skin irritation 2	skin sensitisation
P303 + P361 + P353 IF ON SKIN (or hair): Remove/take off immediately all contaminated clothing. Rinse skin with water/shower.	P302 + P352 (modified) IF ON SKIN: wash with plenty of water.		

Proposals for P361-P363

Current situation:

P361	Remove/take off immediately all contaminated clothing	Flammable liquids (chapter 2.6)	1, 2, 3	
		Acute toxicity, dermal (chapter 3.1)	1, 2, 3	
		Skin corrosion (chapter 3.2)	1A, 1B, 1C	
P362	Take off contaminated clothing and wash before reuse.	Skin irritation (chapter 3.2)	2	
P363	Wash contaminated clothing before reuse	Acute toxicity, dermal (chapter 3.1)	1, 2, 3	
		Acute toxicity, dermal (chapter 3.1)	4	
		Skin corrosion (chapter 3.2)	1A, 1B, 1C	
		Skin sensitization (chapter 3.4)	1, 1A, 1B	

Flammable liquids 1, 2, 3	Acute toxicity, dermal 1, 2, 3	Acute toxicity, dermal 4
P303 + P361 + P353 IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower.	P302 + P352 IF ON SKIN: Wash with plenty of soap and water. P361 Remove/Take off immediately all contaminated clothing. P363 Wash contaminated clothing before reuse.	P302 + P352 IF ON SKIN: Wash with plenty of soap and water. P363 Wash contaminated clothing before reuse.
Skin corrosion 1A, 1B, 1C	Skin irritation 2	Skin sensitization 1A, 1B, 2
P303 + P361 + P353 IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower. P363 Wash contaminated clothing before reuse.	P302 + P352 IF ON SKIN: Wash with plenty of soap and water. P362 Take off contaminated clothing and wash before re-use	P302 + P352 IF ON SKIN: Wash with plenty of soap and water. P363 Wash contaminated clothing before reuse.

Option 1 [N. B. changes proposed to P352 not included here]

P361	Remove/ Take off immediately all contaminated clothing	Flammable liquids (chapter 2.6)	1, 2, 3
		Acute toxicity, dermal (chapter 3.1)	1, 2, 3
		Skin corrosion (chapter 3.2)	1A, 1B, 1C
P362	Take off contaminated clothing and wash before reuse.	Skin irritation (chapter 3.2)	2
		Acute toxicity, dermal (chapter 3.1)	4
		Skin sensitization (chapter 3.4)	1A, 1B, 2
P363	Wash contaminated clothing before reuse	Acute toxicity, dermal (chapter 3.1)	1, 2, 3
		Skin corrosion (chapter 3.2)	1A, 1B, 1C
		Acute toxicity, dermal (chapter 3.1)	4
		Skin sensitization (chapter 3.4)	1A, 1B, 2

Flammable liquids 1, 2, 3	Acute toxicity, dermal 1, 2, 3	Acute toxicity, dermal 4
P303 + P361 + P353 IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/shower.	P302 + P352 IF ON SKIN: Wash with plenty of soap and water. P361 Remove/ Take off immediately all contaminated clothing. P363 Wash contaminated clothing before reuse.	P302 + P352 IF ON SKIN: Wash with plenty of soap and water. P363 Wash contaminated clothing before reuse. P362 Take off contaminated clothing and wash before reuse
Skin corrosion 1A, 1B, 1C	Skin irritation 2	Skin sensitization 1A, 1B, 2
P303 + P361 + P353 IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/shower. P363 Wash contaminated clothing before reuse.	P302 + P352 IF ON SKIN: Wash with plenty of soap and water. P362 Take off contaminated clothing and wash before reuse	P302 + P352 IF ON SKIN: Wash with plenty of soap and water. P363 Wash contaminated clothing before reuse. P362 Take off contaminated clothing and wash before reuse
