

**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals**

15 November 2012

**Sub-Committee of Experts on the
Transport of Dangerous Goods**

Forty-second session

Geneva, 3– 11 December 2012

Item 8 (a) of the provisional agenda

**Issues relating to the Globally Harmonized System
of Classification and Labelling of Chemicals:**

Miscellaneous

**Sub-Committee of Experts on the Globally Harmonized
System of Classification and Labelling of Chemicals**

Twenty-fourth session

Geneva, 12 – 14 December 2012

Item 2 (d) of the provisional agenda

**Updating of the Globally Harmonized System of
Classification and Labelling of Chemicals (GHS):**

Annexes

**Comments on ST/SG/AC.10/C.3/2012/102 –
ST/SG/AC.10/C.4/2012/19**

Transmitted by the European Aerosol Federation (FEA)

1. The United Kingdom on behalf of the informal correspondence group on Annexes 1-3 of the GHS has submitted document ST/SG/AC.10/C.3/2012/102–ST/SG/AC.10/C.4/2012/19 to amend physical hazard precautionary statements.
2. One of the changes is to modify the precautionary statement P210:
“Keep away from heat/sparks/open flames/hot surfaces. No smoking.”
to become:
“Keep away from heat, hot surfaces, sparks, open flames and other ignition sources.
No smoking”
3. P210 applies to 12 hazard classes including Aerosols (Chapter 2.3) for all its hazard categories.
4. The European aerosol industry understands the rationale behind this proposal but has a serious practical concern regarding such an editorial modification of the precautionary statement P210 at this point in time.
5. The labelling related to aerosol dispensers has been discussed at length during the biennium 2009-2010 and provisions have again been modified in the 4th edition of the GHS (2011). These provisions will be implemented in the EU CLP Regulation in 2013.
6. Consequently the European aerosol industry will have to start to re-label all its products from mid-2013 to successfully have adapted the labelling of all its products by latest June 2015, which is the EU CLP general deadline to re-label all mixtures.
7. If the revised precautionary statement P210 was adopted and included in the 5th edition of the GHS (2013), the new statement will be included in the EU CLP probably in 2015 and the entire European aerosol industry would be forced to re-label again all its aerosol products for editorial changes in P210.
8. More than 5.2 billion aerosol dispensers/year are manufactured within the European Union. Labels are generally pre-printed onto aerosol containers, so any labelling change is far more costly and time consuming than changing a paper label. The costs for additional

artwork changes just because of such a minor editorial modification appear to be fully out of proportion.

9 FEA invites the members of the Sub-Committee to reconsider the need of such editorial changes in labelling provisions which would have no measurable effect on consumer safety but which would have a significant economic impact.
