



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

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Item 2 (d) of the provisional agenda

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

Corrections to hazard and precautionary statements

Transmitted by the expert from the United Kingdom on behalf of the informal correspondence group on Annexes 1 to 3¹

1. This document seeks to correct some minor editorial errors in the GHS hazard and precautionary statements which have been pointed out by members of the informal correspondence group on annexes 1-3 of the GHS.

Correction 1 – hazard statements H315 and H320

2. Table 3.3.5 in Chapter 3.3 of the GHS sets out the label elements for serious eye damage/eye irritation:

	Category 1	Category 2A	Category 2B
Symbol	Corrosion	Exclamation mark	<i>No symbol</i>
Signal word	Danger	Warning	Warning
Hazard statement	Causes serious eye damage	Causes serious eye irritation	Causes eye irritation

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/38, para. 16 and ST/SG/AC.10/C.4/40, Annex II, item 2 (c)).

3. Accordingly, in Table A3.1.2 (Annex 3, Section 1), hazard statements H315 and H320 are assigned to hazard classes and categories as follows:

Code (1)	Health hazard statements (2)	Hazard class (GHS chapter) (3)	Hazard category (4)
H315	Causes skin irritation	Skin corrosion/irritation (chapter 3.2)	2
H320	Causes eye irritation	Serious eye damage/eye irritation (chapter 3.3)	2B

4. However later in Table A3.1.2 the combined hazard statement H315 + H320 is assigned to hazard classes and categories as follows:

Code (1)	Health hazard statements (2)	Hazard class (GHS chapter) (3)	Hazard category (4)
H315 + H320	Causes skin and eye irritation	Skin corrosion/irritation (chapter 3.2) and serious eye damage/eye irritation (chapter 3.3)	2 (skin)/2A (eye)

5. The assignment of eye 2A to the combined hazard statement is a mistake, since H315 + H320 should be assigned to chemicals that are skin irritants category 2 and eye irritants category 2B in consistency with the entries for H315 and H320. The correct hazard statement for category 2A is H319 “causes serious eye irritation”.

Proposal

6. In column (4) of the entry for the combined statement H315 + H320 in Table A3.1.2:

Replace “2 (skin)/ 2A (eye)” with “2 (skin)/2B (eye)”

Correction 2 – precautionary statements P312 and P241

7. In Table A3.2.3 “Codification of Response precautionary statements” (Annex 3, Section 2), precautionary statement P312, currently reads:

“Call a POISON CENTER/doctor/.../if you feel unwell.”

8. The forward slash “/” indicates cases where the manufacturer or supplier or the competent authority should choose between one or more appropriate phrases or words. In this case the manufacturer should choose between the phrases “POISON CENTER” or “doctor”, or some other appropriate source of medical advice. The wording “if you feel unwell” should always be included, for example, the statement could read “Call a POISON CENTER if you feel unwell” or “Call a doctor if you feel unwell” depending on what is appropriate in the country or region concerned.

9. Therefore, the final slash, prior to “if you feel unwell” should not be included, since “if you feel unwell” is not optional text.

10. The same mistake is included in precautionary statement P241, in Table A3.2.2, which currently reads:

“Use explosion-proof electrical/ventilating/lighting/.../equipment.”

11. The word “equipment” is in this case not optional text, so the final slash “/” should be deleted.

Proposal

12. In the entry for P312 in Table A3.2.3 (Annex 3, Section 2), delete the third slash in the precautionary statement “Call a POISON CENTER/doctor/.../if you feel unwell”. The statement should read, “Call a POISON CENTER/doctor/... if you feel unwell.”

13. Make the same correction to P312 in the entries in Table A3.2.3 (Annex 3, Section 2), for the combination statements P301 + P312 and P304 + P312. These statements should read “IF SWALLOWED: Call a POISON CENTER/doctor/... if you feel unwell” and “IF INHALED: Call a POISON CENTER/doctor/... if you feel unwell.”

14. In the entry for P241 in Table A3.2.2 (Annex 3, Section 2), delete the final slash in the statement “Use explosion-proof electrical/ventilating/lighting/.../equipment”. The statement should read, “Use explosion-proof electrical/ventilating/lighting/... equipment”.

Consequential amendments

15. Apply the same corrections to the precautionary statements in the tables under A3.3.5 “Matrix of precautionary statements by hazard class/category” in Annex 3, Section 3.
