

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 4 (b) of the provisional agenda

Hazard communication issues: Improvement of annexes 1 to 3 and further rationalisation of precautionary statements

Work on improvement of Annexes 1, 2 and 3 and further rationalisation of the precautionary statements

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

1. The Correspondence Group on improving Annexes 1, 2 and 3 of the GHS met on 6 and 7 July 2016. Discussions covered a wide range of issues as summarised below.
2. In considering appropriate information for consumers the Group again noted the problematic nature of the existing general precautionary statement P103, Read the label. Further consideration will be given to the issue to give more purpose to the statement by adding, for example, “and carefully follow safety instructions”, and by being more specific on when this precautionary statement should be used.
3. The Group also considered a possible new condition for inclusion in column 5 of Table A3.2.2 (prevention precautionary statements) in section 2 of Annex 3 on when certain statements may not be appropriate for products used only by consumers. There were mixed opinions on the utility of such a change.
4. The Group agreed a number of detailed editorial and presentational changes to Tables A3.2.2, A3.2.3, A3.2.4 and A3.2.5, and will further explore a revised condition for P501 (Dispose of contents/container to ...) to indicate it need not be used where there are no specific disposal requirements for substances or mixtures used only in workplaces.
5. Subject to editorial suggestions, the Group agreed a proposed revision of the existing text at the start of section 3 of Annex 3 (Use of precautionary statements).
6. The Group considered a revised presentation of the matrix of precautionary statements in section 3 of Annex 3 intended to give a better overview of how the label elements reflect changes in hazard severity. There was some support for the new presentation, and the Group will explore this further, for example, by adding the graphical symbols as well as the symbol descriptions and codes.
7. Following up on previous discussions, the Group considered briefly draft new text in section 3 of Annex 3 on combining or consolidating precautionary statements, and on minor variations of the text of precautionary statements not affecting the safety message.
8. The Group continued its work on rationalising the precautionary statements in the series P310 to P312 (relating to calling a poison centre/doctor/...) and P313 to P315 (relating to medical advice/attention). Three possible options were considered for precedence rules to provide concise advice in one or two precautionary statements from the

large arrays of such statements that are often currently triggered by the classification. The Group expressed a general preference for one of the options, and work on this will continue.

9. In the context of brief consideration of INF.25, the Group agreed that in future the existing precautionary statements on medical advice/attention and on consulting a poison centre/doctor/... should be carefully reviewed from first principles to reduce the number of statements and provide more clarity for the end user in all languages. In the interim work would continue to see what can be done to improve the existing system.

10. The Group will prepare a Working Document for the next Sub-Committee meeting taking forward as many of these issues as possible.
