

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

Proposed changes to sections 2 and 3 of Annex 3 of the GHS in document ST/SG/AC.10/C.4/2016/17:

**Transmitted by the expert from the United Kingdom on behalf of the
correspondence group on improving annexes 1, 2 and 3 of the GHS**

Background

1. This document shows marked up changes to the text in Section 3 of Annex 3 of the GHS under the heading 'Use of Precautionary Statements', as listed in document ST/SG/AC.10/2016/17, paragraph 8.
2. New proposed wording is shown in underlined italics, *thus*, and text to be deleted is shown in strike-through, ~~thus~~.

Changes to the text in Section 3 of Annex 3 of the GHS under the heading ‘Use of Precautionary Statements’

“A3.3.1 Introduction

A3.3.1.1 This section provides guidance on the use of precautionary statements consistent with the GHS, including advice on the selection of appropriate statements for each GHS hazard class and category. ~~This section should be seen as a living document and therefore~~ *It will be* subject to further refinement and development over time. ~~The basic concepts of the matrix and the philosophy given~~ *though the overall approach set out* below will remain. [Note: previously A3.3.1.6.]

A3.3.1.2 Precautionary statements should, *as an important part of hazard communication*, appear on GHS labels, *generally* along with the GHS hazard communication elements (pictograms, signal words and hazard statements). Additional supplemental information, such as directions for use, may also be provided at the discretion of the manufacturer/supplier and/or competent authority (see Chapter 1.2 and Chapter 1.4, para. 1.4.6.3). [Note: previously in A3.3.2.3]

A3.3.1.3 The starting point for assigning precautionary statements is the hazard classification of the *substance or mixture*. ~~chemical product~~. The system of classifying hazards in the GHS is based on the intrinsic properties of the ~~chemicals~~ *substances or mixtures* involved (see 1.3.2.2.1). In some systems, however, labelling may not be required for chronic hazards on consumer products if information shows that the respective risks can be excluded under conditions of normal handling, normal use or foreseeable misuse (see Annex 5). If certain hazard statements are not required then the corresponding precautionary statements are also not necessary (see A5.1.1).

A3.3.1.4 The guidance for assigning the phrases in this section has been developed to provide the essential minimum phrases linking precautionary statements with relevant GHS hazard classification criteria and type of hazard.

A3.3.1.5 Existing precautionary statements have been used to the maximum extent as the basis for the development of this section. These existing systems have included the IPCS International Chemical Safety Card (ICSC) Compilers Guide, the American National Standards (ANSI Z129.1), the EU classification and labelling directives, the Emergency Response Guidebook (ERG 2004), and the Pesticide Label Review Manual of the Environmental Protection Agency (EPA) of the United States of America.

A3.3.1.6 ~~The presumed observation~~ *understanding and following* of precautionary label information, specific safety guidelines, and the safety data sheet for each product before use are part of ~~the labelling requirements and~~ occupational health and safety procedures. [Note: previously A3.3.3.2] ~~The goal of this section is to promote a more e~~ Consistent use of precautionary statements. ~~Their use~~ will reinforce safe handling procedures and will enable the key concepts and approaches to be emphasized in *workplace* training and education activities.

A3.3.1.7 In order to correctly implement precautionary measures concerning prevention, response, storage and disposal, it is also necessary to have information on the composition of products at hand, so that information shown on the container, label and safety data sheet can be taken into account when asking for further specialist advice. [Note: previously A3.3.3.3]

A3.3.1.8 To protect people with different reading abilities, it might be useful to include both precautionary pictograms and precautionary statements in order to convey information in more than one way (see 1.4.4.1 (a)). It should be noted, however, that the

protective effect of pictograms is limited and the examples in this annex do not cover all precautionary aspects to be addressed. While pictograms can be useful, they can be misinterpreted and are not a substitute for training. [Note: previously A3.3.4.7]

A3.3.2 **Flexibility in the use of Structure of the precautionary statements matrix**

A3.3.2.1 Omission of precautionary statements where the advice is not relevant

Subject to any requirements of competent authorities, those responsible for labelling may decide to omit other precautionary statements for a hazard class and category where the information is clearly not appropriate or is adequately addressed by other information on the label, taking into account the nature of the user (e.g. consumer, employers and workers), the quantity supplied, and the intended and foreseeable circumstances of use. Where a decision is made to omit a precautionary statement the supplier of the substance or mixture should be able to demonstrate that the precautionary statement is not appropriate for the intended and foreseeable use, including potential emergency situations.

A3.3.2.2 Combination or consolidation of precautionary statements

A3.3.2.2.1 To provide flexibility in the application of precautionary phrases, combinations or consolidations of precautionary statements are encouraged to save label space and improve readability. [Note: previously in A3.3.2.2] The matrix and the Tables in Section 2 of Annex 3 include a number of combined precautionary statements. However, these are only examples and those responsible for labelling should further combine and consolidate phrases where this contributes to clarity and comprehensibility of label information.

A3.3.2.2.2 Combinations of precautionary statements can also be useful for different types of hazard where the precautionary behaviour is similar. Examples are P372+ P370+ P380, **Explosion risk. In case of fire: evacuate area**, and P210+ P403, **Keep away from heat, sparks and open flame and store in a cool well ventilated place**. [Note: previously in A3.3.2.2]

A3.3.2.3 Variations of text not affecting the safety message

A3.3.2.3.1 Subject to any requirements of competent authorities, the precautionary statements that appear on labels or in safety data sheets may incorporate minor textual variations from those set out in the GHS where these variations assist in communicating safety information and the safety advice is not diluted or compromised. These may include spelling variations, synonyms or other equivalent terms appropriate to the region where the product is supplied and used. [Note: GHS 1.4.6.2 makes clear that variations should not be allowed in symbols, signal words and hazard statements.]

A3.3.2.3.2 ~~However, it is not necessary to insist on identical sets of words in all situations. Derogations from the recommended labelling statements are at the discretion of competent authorities.~~ In all cases, clear plain language is essential to convey information on precautionary behaviour. [Note: previously A3.3.4.1] Furthermore, to ensure clarity of safety messages any variations should be applied consistently on the label and in the safety data sheet.

A3.3.2.4 Application of precautionary statements concerning medical response

A3.3.2.4.1 Where a substance or mixture is classified for a number of health hazards, this may trigger multiple precautionary statements relating to medical response i.e. calling a poison center/doctor/... (series P310-P312) and getting medical advice/attention (series P313-315). Usually, the label need only include one precautionary statement reflecting the response at the highest level with the greatest urgency, which should always be combined with at least one route of exposure or symptom ('IF' statement).

NOTE: This does not apply to P314 “Get medical advice/attention if you feel unwell” nor P315 “Get immediate medical/advice attention” which are not combined with a separate “IF” statement and should appear without prioritisation.

A.3.3.2.4.2 In general, the following principles should be applied:

- (a) Where the classification of a substance or mixture triggers several different precautionary statements a system of prioritisation should be applied. P310, “**Immediately call a POISON CENTER/doctor/...**”, should be prioritised over P311-P313; P311, “**Call a POISON CENTER/doctor/...**” over P312 and P313; and where only P312, “**Call a POISON CENTER/doctor/...if you feel unwell**”; and P313, “**Get medical advice/attention**”, are triggered, P311, “**Call a POISON CENTER/doctor/...**” should be used.
- (b) Routes of exposure, including P308 “**IF exposed or concerned**”, may be combined when triggered with a medical response statement. If the response statement is triggered with three or more routes of exposure then P308 may be used instead. However, relevant “IF” statements describing symptoms (e.g. P332, P333, P337, P342) should be included in full. If a route of exposure is triggered multiple times it should only be included once.

For example:

- (i) If P301 and P305, “**IF SWALLOWED:**” and “**IF IN EYES:**”, are triggered with P313, “**Get medical advice/attention**”, and P312, “**Immediately call a POISON CENTER/doctor/...if you feel unwell**”, then P301 + P305 + P311, “**IF SWALLOWED OR IN EYES: Call a POISON CENTER/doctor/...**”, should appear.
- (ii) If P304, P302, P301 and P333, “**IF INHALED:**”, “**IF ON SKIN:**”, “**IF SWALLOWED:**” and “**If skin irritation or rash occurs:**”, are triggered with P310, “**Immediately call a POISON CENTER/doctor/...**”, and P311, “**Call a POISON CENTER/doctor/...**”, then P308 + P332 + P310, “**IF exposed or concerned or if skin irritation or rash occurs: Immediately call a POISON CENTER/doctor/...**”, should appear.
- (iii) If P305 and P302, “**IF IN EYES:**” and “**IF ON SKIN:**”, are triggered with P310, “**Immediately call a POISON CENTER/doctor/...**”, P313, “**Get medical advice/attention**”, and P314, “**Get medical advice/attention if you feel unwell**”, then P303 + P302 + P310: “**IF IN EYES OR ON SKIN: Immediately call a POISON CENTER/doctor/...**”, and P314, “**Get medical advice/ attention if you feel unwell...**” should appear separately.

A3.3.3 General precautionary measures

A3.3.3.1 General precautionary measures should be adopted for all substances and mixtures which are classified as hazardous to human health or the environment. To this end the needs of, and the information sources available to ~~three~~ two groups of users ~~or applicators~~ should be taken into account: consumers and employers/workers. ~~the general public, the commercial user and the industrial worker.~~ [Group names aligned with relevant target audiences in 1.4.3 of the GHS.]

A3.3.3.2 In addition to the appropriate precautionary statements in the matrix, taking into account the guidance in this section, the following general precautionary statements laid out in Table A3.2.1 on the GHS label are appropriate for consumers under the given conditions and should also appear on GHS labels.:

General public	GHS label, supplemental label information	P101	If medical advice is needed: Have product container or label at hand
		P102	Keep out of reach of children
		P103	Read label before use
Industrial	GHS label, supplemental label information, Safety Data Sheet, workplace instructions		<i>None of the above</i>

A3.3.4 Matrix of precautionary statements by hazard class/category Allocation of precautionary statements

A3.3.4.1 This section sets out a matrix *listing* the recommended precautionary statements for each hazard class and hazard category of the GHS by type of precautionary statement (see A3.2.2.1). *The matrix* which guides the selection of appropriate precautionary statements, *and* it includes elements for all categories of precautionary action. All specific elements relating to particular hazard classes should be used. *In addition*, general elements *precautionary statements* not linked in particular to a certain hazard class or category should also be used where relevant (*see A3.3.3*). [Note: Includes part of previous A3.3.5.1. However, the sentence ‘In each case the precautionary statement has the applicable code on the line immediately above’ is of limited value and has been omitted. A3.3.4.2 to A3.3.4.6 below were previously A3.3.4.1 to A3.3.4.5.]

A3.3.4.2 The tables making up the matrix show the core part of the precautionary statements in bold print. This is the text, except as otherwise specified, that should appear on the label. [Note: additional text in A3.3.4.1 moved to A3.3.2.3.1 under ‘flexibility’]

A3.3.4.3 Text in italics that starts with “– *if*” or “– *specify*” is intended to be an explanatory conditional note for the application of the precautionary statements and is not intended to appear on the label.

A3.3.4.4 When a forward slash or diagonal mark [/] appears in a precautionary statement text, it indicates that a choice needs to be made between the phrases they separate. In such cases the manufacturer or supplier can choose, or competent authorities may prescribe, one or more appropriate phrase(s). For example, “**Wear protective gloves/protective clothing/eye protection/face protection**” could read “**Wear eye protection**” or “**Wear eye and face protection**”.

A3.3.4.5 When three full stops [...] appear in a precautionary statement text, they indicate that all applicable conditions are not listed. In such cases the manufacturer or supplier can choose, or the competent authorities may prescribe the other conditions to be specified. For example, in the statement “**Use explosion-proof [electrical/ventilating/lighting/...] equipment**”, the use of “...” indicates that other equipment may need to be specified.

A3.3.4.6 In the majority of cases, the recommended precautionary statements are independent, e.g. the phrases for explosive hazard do not modify those related to certain health hazards and products that are classified for both hazard classes should bear appropriate precautionary statements for both.