



**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****Thirty-seventh session**

Geneva, 8-10 July 2019

Item 3 (b) of the provisional agenda

Hazard communication:**improvement of annexes 1 to 3 and further
rationalization of precautionary statements****Proposed changes to the presentation of flammable gas
categories and sub-categories in Annex 3****Transmitted by the expert from the United Kingdom on behalf of the
informal working group on improving annexes 1, 2 and 3 of the GHS*****Background**

1. In line with its mandate for the 2019-2020 biennium the informal working group has taken forward work under its focus area (b): “to eliminate inconsistencies in the presentation of precautionary statements in Annex 3, including looking at disparities between the application of precautionary statements for different hazard classes/categories.”
2. This document presents the outcome of work on item 7 in the Group’s workplan (informal document INF.25, thirty-sixth session) where the issue is: “review the presentation of hazard categories for chemically unstable gases”.
3. In the course of this review the informal working group noted a need for presentational changes to be made to Table A3.2.2 of Annex 3 for the hazard class flammable gas, hazard category 1A to provide clarity and eliminate inconsistencies.

* In accordance with the programme of work of the Sub-Committee for 2019-2020 approved by the Committee at its ninth session (see ST/SG/AC.10/C.3/108, paragraph 141 and ST/SG/AC.10/46, paragraph 14).

Discussion and proposal

4. The classification criteria in Table 2.2.1 of Chapter 2.2 “Flammable Gases” specify sub-categories within the flammable gases hazard category 1A. These hazard sub-categories are: flammable gas; pyrophoric gas; chemically unstable gas A; and chemically unstable gas B.

5. The Annexes 1-3 informal working group identified two areas where amendments should be made to improve clarity and consistency of the sub-categories of flammable gases hazard category 1A presented in Table A3.2.2 of Annex 3 in line with Table 2.2.1 and the matrix tables in section 3 of Annex 3. Specifically, the issues identified in Table A3.2.2 are:

- For precautionary statements P203 (introduced in the eighth revised edition of GHS), P222, and P280: the hazard category lists “A, B (chemically unstable gases)” or “pyrophoric gases” without indicating these are sub-categories within the flammable gases hazard category 1A;
- For precautionary statements P210, P377, P381, and P403 in Table A3.2.2 the hazard category refers only to “1A, 1B, 2” rather than specifying all relevant hazard sub-categories for 1A as identified in Table 2.2.1 and listed in the matrix tables for “flammable gases”, “chemically unstable gases A or B” and “pyrophoric gases”.

6. To provide greater clarity and consistency between Table 2.2.1, Table A3.2.2 and the matrix, the proposal is to amend the flammable gases hazard category 1A entries in Table A3.2.2 of section 2 of Annex 3 for P203, P210, P222, P280, P377, P381 and P403 as follows:

- P203: replace the entry “A, B (chemically unstable gases)” with:

Hazard Category (4)	
1A	Chemically unstable gas A
	Chemically unstable gas B

- P222 and P280: for pyrophoric gas, insert “1A” prior to “Pyrophoric gas”;
- P210, P377, P381 and P403: replace the entry “1A, 1B, 2’ with:

Hazard Category (4)	
1A	Flammable gas
	Pyrophoric gas
	Chemically unstable gas A
	Chemically unstable gas B
1B, 2	

Action

7. The Sub-Committee is invited to agree the proposed changes in paragraph 6 above, and as shown in informal document INF.4.
