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

8 December 2010

Twentieth session Geneva, 7–9 December 2010 Items 2 of the provisional agenda Updating of the third revised edition of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) – Annexes

Revision of Annexes 1, 2 and 3 of the GHS – Precautionary statements

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

Part 1: corrections/amendments to ST/SG/AC.10/C.4/2010/12

Heading "Annex 3, section 3" - should read "section 2".

P244 - 'values' should read 'valves'

P340 - replace 'ensure comfortable breathing' with 'keep comfortable for breathing'.

<u>Rationale</u>: 'ensure' is not an action word and may be problematic from a legal point of view. 'Keep' is clearer, more comprehensible and more legally correct.

P364 – text in 2^{nd} para should read: "After P363, add a new row containing the precautionary statement P364 to read, "and wash it before reuse". Under columns 3 and 4 apply this to hazard classes Acute toxicity, dermal (chapter 3.1), categories 1, 2, 3, 4 and Skin irritation (chapter 3.2), category 2, and skin sensitisation (chapter 3.4) 1, 1A, 1B'.

<u>*Rationale:*</u> editorial correction. The combined statement P362+ P364 has been applied to skin sensitisers so should also be mentioned here.

P361 + P364 – incomplete, should read, "Take off immediately all contaminated clothing *and wash it before reuse.*"

<u>Rationale:</u> editorial correction; the text of P364 was not previously included.

P308 + P313 "If exposed or concerned: Get medical advice/attention". Delete this paragraph in 2010/12. The entry should read instead:

"P308 + P311

Add row under P306 + P360, containing the new combined precautionary statement, P308 + P311, 'If exposed or concerned: Call a POISON CENTER/ doctor/...'

Under columns 3 and 4 apply this to Specific target organ toxicity, single exposure (chapter 3.8), categories 1 and 2.



Add the condition for use 'Manufacturer/supplier or the competent authority to specify the appropriate source of emergency medical advice' to column 5.

Add this combined statement to the entries for Specific target organ toxicity, single exposure (chapter 3.8), categories 1 and 2 in A3.3.5.1, together with the above condition for use."

<u>Rationale</u>: this is consistent with the fact that the GHS currently requires the statement P311, 'Call a POISON CENTER or doctor/physician' for STOT SE, category 1 and 2, and not P313 ('Get medical advice/attention') as proposed in 2010/12. Thus the correct combined precautionary statement for these categories should be P308 + P311, not P308 + P313.

P307 + P311 and P309 + P311: delete these statements from Annex 3 of GHS.

<u>Rationale</u>: it is proposed that the statement P308 + P311 be used instead for specific target organ toxicity, categories 1 and 2 (see comment on P308 + P311 above) so these statements are redundant and should be deleted.

Part 2: proposed entry in programme of work for biennium 2011-2012

The informal correspondence group on Annexes 1-3 proposes the following amended terms of reference for its work during 2011-2012:

"Improvement of Annexes 1, 2, and 3 of the GHS

Pursue work to further improve Annexes 1, 3 and 3 of the GHS, following the work streams hereafter, with the first *two* given priority:

- Work stream 1: to develop proposals to rationalize and improve the usability of hazard and precautionary statements, including proposals to eliminate redundancies among these statements;
- Work stream 2: to adjust as appropriate the precautionary statements for physical hazards, their allocation to hazard classes and categories, and their conditions for <u>use</u>.
- Work stream 23: to improve the presentation of Annexes 1 to 3 of the GHS, taking into account the intended audiences, uses and purposes of the GHS."