

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 (h) of the provisional agenda

**Work on the Globally Harmonized System (GHS):
improvement of annexes 1 to 3 and further
rationalization of precautionary statements**

Combination statement amendments to sections 1, 2 and 3 of 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**

1. Although the proposed combination statement amendments to Annex 3 are presented in full in the accompanying formal document ST/SG/AC.10/C.4/2022/5, to assist those who prefer to view the proposed amendments in colour, these are provided in the annex of this informal document.

Annex

Proposed hazard statement amendments in Annex 3

Section 1 (new text in blue, deleted text in strike-through)

In A3.1.2.3, replace the last sentence with:

“For example, H300 + H310 + **H330** indicates that the text to appear on the label is “**Fatal if swallowed, ~~or in contact with skin or if inhaled.~~”.**”

In A3.1.2.4, replace the last sentence with:

“Also, where a combined hazard statement is ~~indicated~~ **permitted** for two or more hazard statements (see A3.1.2.5), the competent authority may specify whether the combined hazard statement or the corresponding individual statements should appear on the label or may leave the choice to the manufacturer/supplier.”

Insert a new paragraph A3.1.2.5 to read as follows

“A3.1.2.5 In addition to the combinations found in Table A3.1.2, it is also permitted to combine more than one health hazard statement of equivalent severity if, for example, there is insufficient space on the label. When hazard statements are combined, all hazards must be clearly conveyed and only the repetitive text may be deleted. Statements can be combined by using the word “and”, additional punctuation, and changing the case of the initial letter of the word at the beginning of a statement. For example, H317 “May cause an allergic skin reaction” + H340 “May cause genetic defects” + H350 “May cause cancer” may all be combined because they are all for Category 1 health hazards (i.e., health hazard statements of equivalent severity) and have repetitive elements of the hazard statement (i.e., the statements begin with “may cause”). These statements may be combined to “May cause an allergic skin reaction, genetic defects, and cancer.” The competent authority may limit the types of combinations permitted to ensure comprehensibility (e.g., limit the number of hazard statements that can be combined).”

Proposed amendments to Table A3.1.2:

Code	Health hazard statements	Hazard class (GHS chapter)	Hazard category
(1)	(2)	(3)	(4)
H315 + H319	Causes skin irritation and serious eye irritation ¹	Skin corrosion/irritation (chapter 3.2) and serious eye damage/eye irritation (chapter 3.3)	2 (skin) + 2/2A (eye)
H315 + H320	Causes skin and eye irritation ¹	Skin corrosion/irritation (chapter 3.2) and serious eye damage/eye irritation (chapter 3.3)	2 (skin) + 2B (eye)

¹ *Competent authorities may select the applicable hazard statement(s) depending on the serious eye damage/eye irritation hazard categories implemented in their jurisdiction (2/2A or 2A/2B).”*

Section 2 (new text in blue, deleted text in strike-through)

Replace A3.2.5.2.2, with:

“A3.2.5.2.2 Flexibility in the application of individual, combinations or consolidations of precautionary statements is encouraged to save label space and improve readability. Precautionary statements can be combined by using the word “and”, additional punctuation, and changing the case of the initial letter of the word at the beginning of a statement. For example, P302 + P335 + P334 **“IF ON SKIN: Brush off loose particles from skin and immerse in cool water [or wrap in wet bandages].** The tables in this Section and the matrix in Section 3 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.”

In Section A3.2.2 insert the following new paragraph:

“A3.2.2.4 Where square brackets [...] appear around a precautionary statement code, this indicates the precautionary statement is not appropriate in every case and should be used only in certain circumstances. In these cases, conditions for use explaining when the text should be used are given in column (5) of the tables.”.

In Table A.3.2.3 of Annex 3, Section 2, the entry for ‘P302 + P335 + P334’:

In column 2 replace with:

“**IF ON SKIN: Brush off loose particles from skin- and immerse in cool water [or wrap in wet bandages].**”

Section 3 (new text in blue, deleted text in strike-through)

In the matrix table for pyrophoric solids (chapter 2.10), hazard category 1, column “Response”, replace the P302 + P335 + P334 entry with:

“P302 + P335 + P334

“**IF ON SKIN: Brush off loose particles from skin- and immerse in cool water or wrap in wet bandages.**”