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**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

Eleventh session, 12-14 July 2006
Item 3(c) of the provisional agenda

HAZARD COMMUNICATION ISSUES

Codification of hazard and precautionary statements

Transmitted by the representatives from the European Chemical Industry Council (CEFIC),
the International Association of the Soap, Detergent and Maintenance Products Industry (AISE),
and the International Paint and Printing Ink Council (IPPIC)

Introduction

1. At the tenth session of the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling, CEFIC was invited to submit a formal proposal for the codification of hazard statements for the eleventh session of the Sub-Committee. CEFIC was also invited to lead a correspondence working group comprising of the experts from Australia, Austria, Brazil, Japan, New Zealand, South Africa, the secretariat, and representatives from the International Association of the Soap, Detergent and Maintenance Products Industry (AISE), the International Paint and Printing Ink Council (IPPIC), the Soap and Detergent Association (SDA) and the European Chemical Industry Council (CEFIC), to draft a formal proposal for the codification of precautionary statements for the eleventh session of the Sub-Committee.
2. This proposal is submitted by the CEFIC, AISE and IPPIC members of the precautionary statements correspondence working group as a separate proposal that builds upon the work of the Group. It was realised by these members that there was scope for improving the utility, user

friendliness and ease of use of Annexes 1, 2 and 3 of the GHS by reformatting those Annexes. Notwithstanding the wishes of the Sub-Committee to avoid substantive changes to the GHS whilst authorities were working towards implementation of the GHS, it was considered that such reformatting could provide significant worthwhile operational and financial benefits for those authorities working on implementation of the GHS in terms of simplification of translation of the GHS and future maintenance and updating, and that these would more than outweigh the disturbance of making the changes.

Discussion

3. This proposal uses to the maximum amount possible the work of the precautionary statements correspondence working group (see ST/SG/AC.10/C.4/2006/8 and –2006/8/Add.1 and 2), and should be considered as in addition to their work. In that respect it does not duplicate or repeat their work on the precautionary statement code letter, or their proposals for the codification of hazard statements, the codification of precautionary statements, the proposals for editorial amendments to the precautionary statement texts or the proposal for the amendment of paragraph 1.4.10.5.2 to reference the codes being introduced.

4. In the hazard class tables of label elements, Annex 1, Annex 2 and Annex 3, there appears to be a lot of duplication of information on label elements.

The table below compares the content of these by hazard class by Category.

	Hazard class label element tables	Annex 1	Annex 2	Annex 3
Pictogram		Pictogram		
Symbol	Reference ¹		Symbol	Symbol
Signal word	Signal word	Signal word	Signal word	Signal word
Hazard statement	Hazard statement	Hazard statement	Hazard statement	Hazard statement
Precautionary statement				Precautionary statements
Criteria	Criteria ²		Criteria summary	

¹ *this is a reference to the symbol rather than the symbol itself;*

² *the criteria is in each hazard class chapter but not in hazard class label element tables;*

5. Annexes 2 and 3 contain references to symbols when in fact it is the pictogram that appears on the label. There are a number of errors and inconsistencies in these tables, which if these were being used extensively should have been picked up by now. This appears to indicate a possible lack of use.

6. The proposal, as contained in addendum 1 to this document (see ST/SG/AC.10/C.4/2006/9/Add.1), is to revise annexes 1, 2 and 3 into a more logical sequence as follows:

- Annex 1 Classification criteria (currently in Annex 2)
- Annex 2 Description of label elements and wherein used (hazard class/category)
- Annex 3 For each hazard class/category, label elements applicable

This would lead on in a logical manner to current Annex 4 “Guidance on the preparation of Safety Data Sheets”.

7. The proposed structure of the reformatted Annexes would then be:

Annex 1 (current Annex 2)

Classification criteria (without the information on hazard communication elements)

Annex 2 (current Annex 3 extended and modified)

This proposed revision will contains 3 sections as follows:

Section 1 A description of GHS and TDG pictograms by hazard class and category, including the information on symbols and colour;

Section 2 A table of hazard statement texts and their codes with an introduction;

Section 3 A table of precautionary statement texts and their codes retaining the existing text from the introduction and some additional text. The tables of precautionary statement have been transferred to the proposed Annex 3 using their codes, whilst the texts of the hazard statements are in section 2 of Annex 3;

Section 4 Examples of precautionary pictograms.

Annex 3 (current Annex 1 modified to include precautionary statement codes)

For each hazard class, a table by hazard category of:

- (a) Pictograms (without all the notes referring to pictogram colours etc – see proposed Annex 2);
- (b) Signal words;
- (c) Hazard statement codes (not the text – see proposed Annex 2);
- (d) Precautionary statements codes by each type (not the text – see proposed Annex 2);

8. No information has been lost from the current Annexes 1, 2 and 3, including the new hazard and precautionary statement tables. In total the number of pages has been effectively reduced from 166 pages to 112 pages, a reduction of one third.

9. We consider that this considerably improves the ease of reference, ease of use and user friendliness of the Annexes, and at the same time it should facilitate their future update and maintenance.

10. The table below compares the proposed revised content of these by Hazard Class by Category;

	Hazard class label element tables	Annex 1	Annex 2	Annex 3
Pictogram			Pictogram	Pictogram
Symbol	Reference ¹		Reference	
Signal word	Signal word			Signal word
Hazard statement	Hazard statement		Hazard statement text and codes	Hazard statement codes
Precautionary statement			precautionary statement text and codes	precautionary statement codes
Criteria	Criteria ²	Criteria summary		

¹ *this is a reference to the symbol rather than the symbol itself*

² *the criteria is in each hazard class chapter but not in hazard class label element tables*

11. Annex 1 is the current Annex 2 with the references to label elements removed. Possible typographical errors have been identified by highlighting in yellow.

12. Annex 2 section 1 copies the GHS and TDG pictograms from the current Annex 1, and additionally provides information on where each pictogram is used by hazard class and hazard category. For convenience, for internal referencing within the section, each pictogram has been assigned a code which is based on that in 5.2.2.2.2 of the UN Model Regulations on the Transport of Dangerous Goods.

13. In Annex 2 section 2, the hazard statements tables and accompanying text are copied from the proposal for Annex 3 section 1 of the Precautionary Statements Correspondence working group with the paragraph and table numbering amended accordingly.

14. In Annex 2 section 3, the precautionary statement tables are copied from the proposal for Annex 3 section 2 of the precautionary statements correspondence working group with the table numbering amended accordingly. The accompanying text is copied from the proposal for Annex 3 sections 2 and 3 of the precautionary statements correspondence working group and has been consolidated with the paragraph numbering amended accordingly.

15. In Annex 2 section 4 the examples of precautionary pictograms are copied from current paragraph A3.7 in the GHS.

16. Annex 3 is the current Annex 1 with the following amendments;

- (a) Provision made for inclusion of precautionary statement codes by type;
- (b) Hazard statement text replaced by hazard statement codes;
- (c) Descriptive text for TDG pictograms moved to Annex 2 section 1;

Proposal

1. Replace current Annexes 1, 2 and 3 of the GHS with Annexes 1, 2 and 3 as proposed in Addendum 1 to this document (see ST/SG/AC.10/C.4/2006/9/Add.1)

Consequential amendments :

- (a) In paragraph 1.4.6.2, replace the reference to “Annex 3” with “section 3 of Annex 2”;
- (b) In paragraph 1.4.10.2, replace the reference to “Annex 1” with “Annex 3”;
- (c) In paragraph 1.4.10.5.2(c), replace the reference to “Annex 3” with “section 3 of Annex 2”.
- (d) Amend the introductory paragraph before the table in 2.1.3, 2.2.3, 2.3.3, 2.4.3, 2.5.3, 2.6.3, 2.7.3, 2.8.3, 2.9.3, 2.10.3, 2.11.3, 2.12.3, 2.13.3, 2.14.3, 2.15.3, 2.16.3, 3.1.4, 3.2.4, 3.3.4, 3.4.4, 3.5.4, 3.6.4, 3.7.4, 3.9.4 and 4.1.4, as follows:

“General and specific considerations concerning labelling requirements are provided in *Hazard Communication: Labelling* (Chapter 1.4). Annex ~~2-1~~ contains summary tables about classification ~~and labelling~~. Section 3 of Annex 2 ~~3~~ contains examples of precautionary statements and section 4 of Annex 2 contains examples of precautionary pictograms which can be used where allowed by the competent authority. Annex 3 contains summary tables about labelling.” .

The same amendment applies to current paragraph 3.8.4.1 and to the three first sentences of paragraph 3.10.4.
