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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 representative from the European Chemical Industry Council (CEFIC)  
on behalf of the precautionary statements correspondence working group

**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.
2. 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), International Paint and Printing Ink Council (IPPIC), Soap and Detergent Association (SDA) and CEFIC to draft a formal proposal for the codification of precautionary statements for the eleventh session of the Sub-Committee.
3. This formal proposal submitted on behalf of the precautionary statements correspondence working group combines the proposal for the codification of hazard statements and precautionary statements into a single document and builds upon the proposal contained in document ST/SG/AC.10/C.4/2005/8 submitted by the expert from Australia for the tenth session of the Sub-Committee. It takes into account the comments made by the Sub-Committee at the

tenth session (see ST/SG/AC.10/C.4/20, paras. 20 to 22) and the input received from the members of the correspondence working group.

### **Discussion**

4. At the tenth session of the Sub-Committee, the correspondence working group was requested to take into account issues raised during the discussion. These points are addressed in the following paragraphs.

(a) ***Provision of a link to the use of codes in the main body text***

5. In the proposal (below) amendment of sub-paragraphs 1.4.10.5.2 (b) and 1.4.10.5.2 (c) are being proposed.

(b) ***Precautionary statement code letter***

6. At the tenth session of the Sub-Committee, the Chairman of the Sub-Committee on the Transport of Dangerous Goods raised concerns on behalf of the TDG Sub-Committee regarding the use of the letter “P” as the initial digit in the proposed coding system for precautionary statements. Their concern was that it would cause confusion with the packing instruction codes used in transport.

7. After investigation, it would appear that the transport packing instruction codes are not used in documentation or in use settings where both sets of codes would be used together, and therefore the likelihood of any confusion arising is remote. Packing instruction codes used in transport where there would be some overlap with this proposal are:

P101, P201, P202, P301, P302, P401, P402, P403, P404, P405, P406, P407, P408, P409, P410, P411, P501.

8. There are two possible options to consider:

- |                 |                                    |
|-----------------|------------------------------------|
| <u>Option 1</u> | Retain the use of the letter “P”.  |
| <u>Option 2</u> | Use the letter “S” instead of “P”. |

9. The rationale for the use of the letter “S” is that, whereas the GHS uses the term “Hazard Communication” in referring to labels and safety data sheets, the precautionary statements provide the link between hazard and risk, as the intention of their use is to prevent or minimise any possible risk. The following definitions are taken from ISO 11014-1: Safety Data Sheets.

- |         |   |
|---------|---|
| Harm:   | Physical injury and/or damage to health or property;  |
| Hazard: | A potential source of harm;   |
| Risk:   | The probable rate of occurrence of a hazard causing harm; and the degree of severity of the harm; |
| Safety: | Freedom from unacceptable risk of harm;   |

Therefore there is a rationale for the use of the letter “S” as the initial for precautionary statements.

10. The Sub-Committee is invited to come to a decision on the use of the letter “P” or “S”.

(c) **Revision of Annex 3**

11. The formal proposal for the revision of Annex 3 of the GHS to incorporate the codification of hazard statements and precautionary statements as recommended by the Sub-Committee at the tenth session is to be found in Addendum 1 to this document (see ST/SG/AC.10/C.4/2006/8/Add.1). The proposal is to divide Annex 3 of the GHS into 4 sections as follows:

Section 1	Codification of hazard statements
Section 2	Codification of precautionary statements
Section 3	Use of precautionary statements
Section 4	Examples of precautionary pictograms

12. Section 1 contains the codes for the hazard statements with accompanying explanatory text and provisions relating to their use.

13. Section 2 contains the codes for the precautionary statements with accompanying explanatory text and provisions relating to their use. To facilitate translation into the languages of users, precautionary statements have been broken down into individual sentences in the tables in this section as proposed in UN/SCEGHS/10/INF.7. In a number of instances the text that appears on a GHS label requires that these be added back together. This is indicated by codes conjoined with a plus sign (“+”), for example P305 + P351 + P338 indicate that the text to appear on the label is **“IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing”**. These additive precautionary statements can be found at the end of each of the precautionary statement tables. Translation of only the single precautionary statements is required, as this will enable the compilation of the additive precautionary statements.

14. The precautionary statement code tables in section 2 contain the following information:

- (a) Code;
- (b) The precautionary statement text;
- (c) Hazard class where used;
- (d) Hazard category where used;
- (e) Conditions for use. (The “Conditions for use” are the existing explanatory texts from the current precautionary statements in Annex 3 of the GHS).

15. Section 3 is the existing Annex 3 slightly revised to incorporate the codes into the precautionary statement matrix, and to revise some of the existing statements as originally proposed by the expert from Australia in ST/SG/AC.10/C.4/2005/8, and as commented on by CEFIC in UN/SCEGHS/10/INF.7. Further amendments have been proposed by the correspondence working group. Details of the textual adjustments that have been made can be found in Addendum 2 to this document (see ST/SG/AC.10/C.4/2006/8/Add.2), which details:

- (a) Code;
- (b) The revised text;
- (c) The original text;

- (d) Hazard class where used;
- (e) Hazard category where used.

16. Section 4 illustrates precautionary pictograms and is the existing paragraph A3.7 of Annex 3 of the GHS.

### **Proposal**

Replace Annex 3 of the GHS with the proposal in Addendum 1 to this document (see ST/SG/AC.10/C.4/2006/8/Add.1).

### ***Consequential amendment:***

Rename current paragraphs under 1.4.10.5.2 (b) and (c) as new sub-paragraphs (i) and add a new (ii) as follows (new text is in italics):

“1.4.10.5.2 Information required on a GHS label

(b) Hazard statements

- (i) A hazard statement means a phrase assigned to a hazard class and category that describes the nature of the hazards of a hazardous product, including, where appropriate, the degree of hazard. The tables of label elements in the individual Chapters for each hazard class detail the hazard statements that have been assigned to each of the hazard categories of the GHS.
- (ii) *Hazard statements and a code uniquely identifying each one are listed in section 1 of Annex 3. The hazard statement codes shall only be used for reference purposes and shall neither form part of the precautionary statement text that appears on a GHS label, nor replace it.*

(c) Precautionary statements and pictograms

- (i) A precautionary statement means a phrase (and/or pictogram) that describes recommended measures that should be taken to minimise or prevent adverse effects resulting from exposure to a hazardous product, or improper storage or handling of a hazardous product. The GHS label should include appropriate precautionary information, the choice of which is with the labeller or the competent authority. Examples of precautionary statements, which can be used, *are given in section 3 of annex 3*; examples of precautionary pictograms, which can be used where allowed by the competent authority *are given in section 4 of annex 3*.
  - (ii) *Precautionary statements and a code uniquely identifying each one are listed in section 2 of Annex 3. The precautionary statement codes shall only be used for reference purposes and shall neither form part of the precautionary statement text that appears on a GHS label, nor replace it.*
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