

UN/SCEGHS/6/INF.2

Sub-Committee of Experts
on the Globally Harmonized System of Classification
and Labelling of Chemical
(Sixth session, 10-12 December 2003)

HARMONIZATION OF PRECAUTIONARY STATEMENTS

Progress of the Correspondence Group on Precautionary Statements (Status Report for discussion on Wednesday 10 December 2003)

presented by the expert from the lead country Germany

1. The Correspondence Group on Precautionary Statements met during the 5th SCEGHS session in July 2003 with the participation of all interested parties to discuss open issues of its terms of references as set out by the expert of the lead country in document UN/SCEGHS/5/INF.5. Some preliminary agreements could be reached (ST/SG/AC.10/C.4/10 Annex 3) and members had been invited to comment on these options by August 15.
2. Methods of work of the Correspondence Group: Taking advantage of the easy circulation of e-mail correspondence, the members have been kept continuously informed on how the system was developing. It was up to the contributors to circulate their views and suggestions to the whole Group at any stage, should they feel it appropriate. It is hoped that this way of doing may further facilitate early convergence of different opinions and avoid duplication of work.
3. Comments were received from the Soap and Detergent Association indicating their preference for:
 - Precautionary statements based either solely on intrinsic hazardous properties or as derived from a risk assessment procedure where applicable;
 - Precautionary statements to be selected from a review of all existing labelling systems;
 - Precautionary statements as short and simple as possible. Supplemental information to be given elsewhere on the label;
 - Precautionary statements as flexible phrases needed to accommodate the various uses being addressed.

Other comments did not express preferences but contributed to the list of existing labelling systems, such as the *Emergency Response Guidebook* (North America), the *Handbook of First Aid Instructions, Safety Directions, Warning Statements and General Safety Precautions for Agricultural and Veterinary Chemicals* (Australia) and a list of Precautionary Statements from the U.S. Consumer Product Safety Commission.

4. Industry (ACC) in close cooperation with experts from CEFIC took the initiative to compile precautionary statements from ANSI (American national Standards Institute), the EU-system and the GHS (Annex 3), to assign them to specific GHS hazard classes; and regroup these informations into a specific table lay-out.

After a round of consultations about the table structure the lead country came up with a new table responding to the following agreed objectives:

- simultaneous assessment of physico-chemical, toxicological and environmental aspects of hazard statements;
- incorporation of “prevention” and “response” as separate issues;
- hierarchy of related Precautionary Statements.

This text, which presents a first attempt of condensation of phrases, has been distributed to the Correspondence Group and is available from the focal point of the Group.

5. Then, the expert from Belgium offered to compare this text with the actual “IPCS phrase” system, which resulted in some minor additions to and deletions from the list. The question arose as if some explanations to certain phrases could be included in the tables.

6. The expert from Japan proposed to list the hazard classes in the same order as in the GHS document. He also asked for deleting those precautionary phrases (or parts of them) which were a mere repetition of the wording of the hazard statements.

7. A few experts in physico-chemical hazards have undertaken together to review the section on physico-chemical hazard precautionary statements along the agreed lines. They announced their intention to forward their comments to the Correspondence Group. However, as of today, these comments have not yet reached the focal point of the Group.

8. Furthermore, many comments and remarks to the focal point of the Group indicate that there is a general feeling that more work still needs to be done on prioritizing phrases, removing duplicate phrases and combining phrases, an issue which would deserve an open exchange of views at the December meeting of the Correspondence Group.

9. To summarize and illustrate the current status of the Correspondence Group’s work, the following schemes and examples are proposed:

- ?? **Annex 1** shows the proposed table lay-out for the precautionary statement guidance document though an example of a particular hazard class, i.e. the Acute Toxicity (oral) hazard class;
- ?? **Annex 2**: is a proposal on precedence of Precautionary Statements regarding Health Hazards;
- ?? **Annex 3**: gives a few examples of the use of precautionary statements for given chemical products.

The Sub-Committee is invited to take note of this information and react as deemed appropriate.

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Annex 1

ACUTE TOXICITY: ORAL

Cat. 1-2

Fatal if swallowed

Cat. 3

Toxic if swallowed



Type of hazard	Precautionary Statements	
	Prevention	Response
physico-chemical hazards		
health hazards	<p>*Keep locked up. *Keep out of the reach of children. *Keep away from food, drink and animal feedingstuffs. *Keep away from living quarters.</p> <p>Wear gloves during work and do not eat, drink, or smoke. Wash hands before eating.</p> <p>**Do not breathe [dusts, mists.]</p> <p>ICSC: Do not transport with food and feedstuffs. Tightly closed. Do NOT take working clothes home. (Cat.1 & 2 only)</p>	<p>In case of accident by ingestion, if the casualty is completely alert and able to swallow, let rinse mouth with water and give one glass of water to drink. Get immediate medical attention.</p> <p>ICSC: Refer for medical attention.</p>
environmental hazards	<p>Do NOT empty into drains.</p> <p>Use appropriate containment to avoid release to the environment.</p> <p>{Specify type of waste as directed by local, regional, national, international requirements.}</p> <p>?Refer to manufacturer/supplier for information on recovery/recycling.?</p> <p>Dispose of this material and its container [as hazardous waste, to hazardous or special waste collection point, in accordance with (regulations specified by manufacturer).</p>	

* if likely to be used by the general public.

** if a corresponding risk not mentioned in the hazard statements should be addressed.

[] suggested text - allows manufacturer to choose best phrase or combination of phrases.

() open text - provides opportunity for manufacturer to include chemical specific instructions.

{ } optional text – to be used at the manufacturer’s discretion.

Optional pictogram



ACUTE TOXICITY: ORAL**Cat. 4 Harmful if swallowed****Cat. 5 (May be harmful) if swallowed)***No symbol*

Aspect	Precautionary Statements	
	Prevention	Response
physico-chemical hazards		
health hazards	*Keep out of the reach of children. *Keep away from food, drink and animal feedingstuffs. *Keep away from living quarters. Wear gloves during work and do not eat, drink, or smoke. Wash hands before eating. **Do not breathe [dusts, mists.]	In case of accident by ingestion, if the casualty is completely alert and able to swallow, let rinse mouth with water and give one glass of water to drink. Get immediate medical attention.
environmental hazards	?Refer to manufacturer/supplier for information on recovery/recycling.? Dispose of this material and its container [as hazardous waste, to hazardous or special waste collection point, in accordance with (regulations specified by manufacturer)].	

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Annex 2

Precedence of Precautionary Statements (DRAFT) *Health Hazards*

Remark for discussion:

A ranking of personal protection measures may appropriate in order to keep precautionary statements limited to the necessary extent. The ranking is thought to correspond in a way to the hazard levels. It should mean that statements of the higher level of protection (i.e. lower number) prevail upon the next lower level and replace them. (One example is the absolute precedence of the level 1 phrase in the EU system as all uses of Cat.1 carcinogens, mutagens, or reproductive toxic substances are strictly forbidden unless special precaution and surveillance measure have been taken.)

Whereas a comparable ranking might be established for the prevention section of the physico-chemical hazards, it seems not appropriate to apply a ranking on the medical response section.

	Prevention	Response
Level 1	<p>AVOID ALL CONTACT [during pregnancy / while nursing]!</p> <p>Use Prevention measures for (all) appropriate route(s) of exposure. - Obtain special instructions before use.</p>	<p>*Keep locked up.</p> <p>*Keep away from living quarters.</p> <p>ICSC: Do not transport with food and feedstuffs.</p>
Level 2	<p>Avoid exposure during pregnancy and while nursing!</p> <p>Use only [in closed systems, in well ventilated areas].</p> <p>Wear suitable respiratory protection.</p> <p>Wear approved respiratory equipment [in case of insufficient ventilation, during fumigation/spraying].</p> <p>Wear suitable ?protective? [gloves, clothing, face-shield, eyewear, eye protection in combination with breathing protection].</p> <p>Do not breathe [gas, vapours, fumes, dusts, mists].</p> <p>ICSC: Do NOT take working clothes home.</p>	<p>*Keep locked up.</p> <p>*Keep away from living quarters.</p> <p>ICSC: Do not transport with food and feedstuffs.</p>
Level 3	<p>Wear gloves during work and do not eat, drink, or smoke.</p> <p>Wash hands before eating.</p> <p>Do not breathe [gas, vapours, fumes, dusts, mists].</p> <p>Avoid contact with skin and eyes.</p>	<p>*Keep out of the reach of children.</p> <p>*Keep away from [food, drink, animal feedstuffs.]</p>

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Annex 3

Hydrazine, anhydrous

EU Hazard assessment

Flammable
 May cause cancer
 Toxic if swallowed
 Toxic in contact with skin
 Toxic if inhaled
 Causes severe skin burns and eye damage
 May cause allergic skin reaction
 Very toxic to aquatic life with long lasting effects

Summarized Statements

Type of hazard	Precautionary Statements	
	Prevention	Response
physico-chemical hazards	Store fireproof. Keep container in a well-ventilated place. GHS: Keep away from [heat, sparks, {open, naked} flame, ignition sources, combustible materials] { -No smoking }. Take precautionary measures against static charges.	
health hazards	Level 1: AVOID ALL CONTACT! Use Prevention measures for (all) appropriate route(s) of exposure. - Obtain special instructions before use. Wear approved respiratory equipment in case of insufficient ventilation. Wear suitable protective gloves, clothing, [face-shield] [eyewear] [eye protection in combination with breathing protection]. ICSC: Do NOT take working clothes home. Do not transport with food and feedstuffs.	Level 1: In any case of contact, get medical attention (show container or label where possible). In case of accident by ingestion, if the casualty is completely alert and able to swallow, let rinse mouth with water and give one glass of water to drink. After contact with skin, wash immediately with plenty of water and soap. Remove contaminated clothing and wash [decontaminate] before reuse. If irritation develops, seek medical advice (show container or label where possible). In case of accident by eye contact, flush with gently flowing fresh water thoroughly Remove contact lenses if easily possible. In case of accident by inhalation, remove casualty to fresh air and keep at rest in a half-upright position. In any case of accident, get immediate medical attention. ICSC: Refer for medical attention.

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Hydrazine, anhydrous (*continued*)

environmental hazards	<p>Do NOT empty into drains.</p> <p>Use appropriate containment to avoid release to the environment.</p> <p>{ Specify type of waste as directed by local, regional, national, international requirements. }</p> <p>Dispose of this material and its container [as hazardous waste, to hazardous or special waste collection point, in accordance with (regulations specified by manufacturer)].</p>	<p>Collect spilled material and dispose of as hazardous waste.</p> <p>Avoid run off to waterways and sewers.</p>
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Chlorine dioxide

status: OXIDIZING GAS (gas under pressure according GHS ?)

Emergency Response Guide North America: see No. 143 Chlorine dioxide, hydrate, frozen

EU classification:

May cause or intensify fire; oxidizer
 Fatal if inhaled
 Causes severe skin burns and eye damage
 Very toxic to aquatic life

Type of hazard	Precautionary Statements	
	Prevention	Response
physico-chemical hazards	Keep away from [heat, sparks, {open, naked} flame, ignition sources, combustible materials] { -No smoking }. Store at temperatures not exceeding [...°C/...°F]. Take precautionary measures against static charges. Japan: Keep away from combustible materials.	In case of fire, use (extinguishing media identified by the supplier). Eliminate all ignition sources.
health hazards	Use only [in closed systems, in well ventilated areas]. Wear approved respiratory equipment in case of insufficient ventilation. Wear suitable ?protective? [gloves, clothing, face-shield, eyewear, eye protection in combination with breathing protection].	If irritation of skin (redness, rash, blistering) develops, get medical [advice, attention]. In case of accident by eye contact, flush with gently flowing fresh water thoroughly (remove contact lenses if easily possible). In case of accident by inhalation, remove casualty to fresh air and keep at rest in a half-upright position. In all cases of accident, get immediate medical [advice, attention].
environmental hazards	Dispose of this material and its container [as hazardous waste, to hazardous or special waste collection point, in accordance with (regulations specified by manufacturer). [Refer to manufacturer/supplier for information on recovery/recycling.]	?In case of fire ?Avoid (extinguishing media) run off to waterways and sewers.

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Naphthalene

EU classification:

Suspected of causing cancer.
Harmful if swallowed.
Very toxic to aquatic life with long lasting effects

Type of hazard	Precautionary Statements	
	Prevention	Response
physico-chemical hazards		
health hazards	*Keep out of the reach of children. *Keep away from food, drink and animal feedingstuffs. Wear gloves during work and do not eat, drink, or smoke. Wash hands before eating. **Do not breathe [dusts, mists.]	
environmental hazards	Do NOT empty into drains. Use appropriate containment to avoid release to the environment. {Specify type of waste as directed by local, regional, national, international requirements.} Dispose of this material and its container [as hazardous waste, to hazardous or special waste collection point, in accordance with (regulations specified by manufacturer).	Collect spilled material and dispose of as hazardous waste. Avoid run off to waterways and sewers.

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