



**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****Thirty-sixth session**

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Item 4 (b) of the provisional agenda

Hazard communication:**improvement of annexes 1 to 3 and further
rationalization of precautionary statements****Proposed changes to Sections 2 to 4 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*****Background**

1. In line with its mandate for the 2017-2018 biennium the informal working group has taken forward work on item 10 in the Group's workplan (informal document INF.12/Rev.1 (thirty-second session)) to: "Review the text before the tables in Section 2 and the matrix in Section 3, consider whether it is appropriate to combine the sections so all the guidance on how to select and use precautionary statements is in one place and to remove repetition". This document presents the outcome of that work.

Discussion

2. In undertaking the work on Sections 2 and 3 of Annex 3, the informal working group also reviewed the title of Section 4 for completeness and consistency.

3. The revised Section 2 brings together the current sub-sections A3.2.1, A3.2.2, A3.2.3, A3.3.1, A3.3.2 and A3.3.3.

* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, para. 98 and ST/SG/AC.10/44, para. 14).

4. In general, the existing text has been kept, with some minor amendments / corrections to, e.g. the existing text in A3.3.1.5 and A3.3.2.2.2, and to remove repetition, e.g. between the existing text in A3.2.3.3 / A3.3.4.4 and A3.2.3.4 / A3.3.4.5. Although the Tables in Section 2 and the matrix in Section 3 remain unchanged, the Table titles in Section 2 have been amended.

5. The informal working group considered that it would be beneficial to keep the existing Section A3.3.4 (Matrix of precautionary statements by hazard class/category), minus the duplicated text (i.e. A3.3.4.3 to A3.3.4.5), in Section 3 with the matrix itself. The purpose of the matrix in GHS is to give an overview of how all the labelling elements reflect changes in hazard severity across all the hazard classes (see ST/SG/AC.10/C.4/2016/17). This is broader than consideration of the precautionary statements themselves and so merits a separate section.

6. The advantages of the proposed amendments to Sections 2 to 4 of Annex 3 are:

- (a) All relevant information on the use and codification of precautionary statements is located in one section in a logical sequence in Section 2;
- (b) The text of Section 2 largely utilises the current text of the two sections hence supports content familiarity;
- (c) Improved readability, including:
 - (i) Arrangement of the text in a more logical order;
 - (ii) Minor redrafting of some paragraphs to improve clarity;
 - (iii) Updated terminology (e.g. replacement of “product” with “mixture”; “phrase” with “statement” etc.);
 - (iv) Corrected wording of the combined precautionary statements P370+P373+P380+P373 and P210+P403 in A3.2.5.2.3 (was A3.3.2.2.2);
 - (v) Inclusion of more cross references to assist readers to locate related sections, paragraphs and tables more easily.
- (d) Removal of repetition and outdated information, including:
 - (i) Deletion of A3.3.4.4 as the text is already present in A3.2.4.2 (was A3.2.3.3);
 - (ii) Deletion of A3.3.4.5 as the text is already present in A3.2.4.3 (was A3.2.3.4);
 - (iii) Deletion of the second sentence in the existing A3.3.1.5 starting with ‘These existing systems have...’ as it is considered no longer relevant given the many changes to the precautionary statements that have been made since 2003 and the proposed amendments to the 7th Revision of GHS.
- (e) Clearer titles for Sections 3 and 4 that better reflect the content of those sections.

7. Although the informal working group acknowledges that the savings in terms of shortening the text are relatively modest, it believes that the advantages above justify the proposed changes to these sections of Annex 3, which are much used by labelling practitioners.

Proposal

8. Informal document INF.9 sets out the proposed changes in full. New text is shown in red. Deleted text is shown in ~~strike through~~. To assist readability of the proposed changes, paragraphs that have been moved are shown in black with their current paragraph number shown in ~~strike through~~ and new paragraph number and any new text in red.

Action requested

9. The Sub-Committee is invited to agree to the proposed changes to Annex 3, sections 2, 3 and 4 as set out in informal document INF.9.
