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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

Eighth session, 7-9 December 2004 Item 3 (a) of the provisional agenda

DEVELOPMENT OF GUIDANCE FOR IMPLEMENTATION

Precautionary Statements (PS)

Transmitted by the European Chemical Industry Council (CEFIC)

At its fourth session in December 2002, the Sub-Committee decided to set up a Correspondence Group on Precautionary Statements (ST/SG/AC.10/C.4/8, para. 27), the objective of which would be to derive advice on how to avoid hazards indicated by GHS hazard statements or to respond to incidents.

CEFIC welcomes the outcome of the work of the group under the lead of Germany. However, CEFIC believes that the wording of precautionary statements should be standardised in the same manner as all other labelling elements. The content of a GHS label should be the same globally once the GHS is implemented. The comprehensibility of a label will improve when all of its elements are standardised. A clear understanding of the label content should lead to an increase in safety during the intended use of hazardous substances or mixtures. In countries or areas with more than a single accepted spoken or written language, deviations in non standardised text for precautionary statements incurs the risk of confusion arising due to small deviations in the meaning of non standardised text or phrases.

Therefore, CEFIC proposes to amend the beginning of the first sentence of the second paragraph of A3.1 of the annex of the paper (page 5 of ST/SG/AC.10/C.4/2004/8/Rev.1) to read:

A **Precautionary statement** is a <u>standardised</u> phrase (and/or pictogram) that describes.....

Consequently, paragraph (2) of the proposal (page 3 of ST/SG/AC.10/C.4/2004/8/Rev.1) should be deleted.

Cefic further proposes that in order to ensure proper translation of such phrases and to facilitate communication during the implementation of GHS a coding system should be developed during the biennium 2005 to 2006.