

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

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HAZARD COMMUNICATION ISSUES

Comments on proposal for work on precautionary statements (ST/SG/AC.10/C.4/2008/24)

Transmitted by the expert from Canada

A. Background

The purpose of this document is to provide comments in relation to paragraphs 24 and 25 of document ST/SG/AC.10/C.4/2008/24 (ie. proposal for work plan for next biennium with regard to precautionary statements).

Due to time constraints, Canada submits this information document in the absence and in anticipation of the correspondence group informal document referred to in ST/SG/AC.10/C.4/2008/24, lead by the United Kingdom.

The following comments are based on the proposals presented in UN/SCEGHS/15/INF.26, submitted in July 2008. These can be used to facilitate discussion at the Sub-Committee and at the meeting of the informal working group.

The work ahead for the next biennium will be intensive and resource demanding. As a result, Canada proposes the following approach for consideration.

B. Proposed approach on workplan activities and order/sequence of work

- (1) Rationalization of precautionary statements: Reduce and reword precautionary statements as necessary;
- (2) Combination of precautionary statements: from the reduced pool of precautionary statements, determine which can be combined and can convey the necessary information with less wording;

- (3) Revising the numbering of the precautionary statements with minimal impact: may include some strategic re-grouping;
- (4) Guidance for selection of precautionary statements and order of preference: may include general principles and criteria of which precautionary statements remain on the immediate container and which can be placed elsewhere and or referred to by other means. The development of guidance may be developed once the first two methods for reduction (ie. rationalization and combination) and new listing of statements has been completed;
- (5) Signposting or other means of referral: what it is (definition) and when and how to use it;

C. Comments and guiding principles on the workplan activities

(1) Rationalisation/reduction in number of precautionary statements

- Rationalization can take place in absence of re-grouping;
- We should be mindful as to whether the change is meaningful/beneficial in other languages (eg. will more wording be needed in the translated version);

(2) Combination of precautionary statements

- In combining precautionary statements, literacy skills must be considered;
- The need for space reduction must be balanced by principles of clear language statements: be direct, keep it short, be specific, keep it simple, be consistent, use good grammar.

(3) Re-numbering of precautionary statements and re-grouping

- Currently precautionary statements are grouped into the following categories with an alpha numerical coding system:

P100 General
P200 Prevention
P300 Response
P400 Storage
P500 Disposal

- In UN/SCEGHS/15/INF.26 there is a proposal to re-group (ie. change categories) so that the headings more closely follow the Safety Data Sheets (SDS);
- Canada strongly supports the Status Quo as per Revision 2;

- The question remains as to whether the benefits in the changes in categories justify the resources needed to revise and implement it;
- If the arguments are in favour of re-grouping, the re-grouping should be done with minimal impact to current number system, since the current coding may be already in use and in training manuals, etc. In addition, the numbering system was recently agreed to in 2006 for GHS Revision 2;
- If re-numbering is necessary due to rationalization and combinations, the numbers should not be re-used. Implementation is underway and thus can cause confusion;
- Where there is wording change, new unique numbers should be issued to avoid confusion.

The options are:

- (a) do not change the categories (no re-grouping);
- (b) change categories (re-grouping) and use brand new numbers (no recycling of old numbers);
- (c) develop a system which integrates the re-grouping with less change and minimal impact to numbering.

The following chart illustrates the differences in grouping and coding between the UN/SCEGHS/15/INF.26 proposal, the current system and an example of a possible hybrid which causes less impact.

Original proposed grouping and coding (as per UN/SCEGHS/15/INF.26)	Current alphanumeric code system	Another example (hybrid)
	P100 General	P100 General
P200 Handling/Storage	P200 Prevention	P200 Prevention/ Exposure control/Personal protection
P300 Response	P300 Response	P300 Response
P400 Exposure control / Personal protection	P400 Storage	P400 Handling /Storage
P500 Disposal	P500 Disposal	P500 Disposal
eg. P270 Protect from sunlight P410 Do not eat/drink or smoke when using this product	eg. P270 Do not eat/drink or smoke when using this product P410 Protect from sunlight	eg. P270 Do not eat/drink or smoke when using this product P410 Protect from sunlight

Original proposed grouping and coding (as per UN/SCEGHS/15/INF.26)	Current alphanumeric code system	Another example (hybrid)
<ul style="list-style-type: none"> -New headings closer to SDS -Major numbering changes. - Some of the 200s become 400s and vice versa - reused/ recycled numbers may cause problems (no longer unique) -high level of accuracy and work involved (proof reading etc.) -major changes to A3.2.1 	<ul style="list-style-type: none"> -status quo, currently in Revision 2 -no changes except those from the rationalization/combination exercise 	<ul style="list-style-type: none"> -New headings closer to SDS -Less change in numbering needed from the original. -if numbering needed, use new numbers - very minor changes to A3.2.1

(4) Guidance for the selection of precautionary statements and “order of preference”

- There is a proposal to identify target audience (ie. workplace or consumer) to assist in determining which precautionary statements to use on the label;
- The selection of precautionary statements should be based on the type of product and the precautionary statements necessary to use the product safely, not based on the target user;
- If the users cannot put the precautionary measure into practice or do not understand the measure, (eg. Use only non-sparking tools) they have two choices---- to not use the product, or to ignore the statement and possibly use the product incorrectly. This is particularly important if there is consideration of the use of the statement **Do not use until all safety precautions have been read and understood**;
- Deleting (rather than re-wording) any necessary precautionary statements based on the speculated comprehension or capabilities of the user is inappropriate and may lead to unsafe use, unbeknownst to the user. Although it is recognized that the competent authority is to make these decisions, this methodology should not be promoted by the GHS.

(5) “Signpost” statements

- The term “signpost” should be defined;
- Since the definition of label includes attached brochures, etc., the “signpost” statement should only go on the label that is affixed to the immediate container;
- There should be no signposting statements on the attachments.
