



**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**

Geneva, 5-7 December 2018

Item 4 (b) of the provisional agenda

Hazard communication:**improvement of annexes 1 to 3 and further
rationalization of precautionary statements****Proposed changes to P201 and P202****Transmitted by the expert from the United Kingdom on behalf of the
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 under its Workstream 1: “to develop proposals to rationalise and improve the comprehensibility of hazard and precautionary statements for users, while taking into account usability for labelling practitioners.”
2. This document presents the outcome of work on item 6 in the Group’s workplan (informal document INF.12/Rev.1, thirty-second session) where the issue is: “Consider merging P201 and P202 (without losing meaning)”.

Discussion and proposal

3. P201, “**Obtain special instructions before use**”, and P202, “**Do not handle until all safety precautions have been read and understood**”, both aim to draw attention to the

* 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).

particular importance of safety precautions where high hazard chemicals are handled and used.

4. The hazard classes and categories where P201 and P202 apply are similar. Both apply to chemicals classified as carcinogenic, mutagenic and toxic to reproduction (CMR) (all categories). There is a condition of use for application of the CMR hazard classes/categories that P201 should be omitted where P202 is used. In addition, P201 applies to unstable explosives and P202 to chemically unstable gases A and B within the hazard class flammable gases (Table A3.2.2).

5. A footnote to Table 2.1.1 explains that “Unstable explosives are those which are thermally unstable and/or too sensitive for normal handling, transport and use. Special precautions are necessary.” As they can’t be transported, handling and use should only be where they are manufactured. The use of chemically unstable gases is also expected to be limited to certain industrial activities, and in some jurisdictions the use of category 1A and 1B CMR substances by the public is restricted. The implication is that the target audience for P201 and P202 is often employers/workers.

6. The existing language in both P201 and P202 is not helpful or consistent. P201 refers to obtaining special instructions before use, but not to reading/understanding these instructions and ensuring the necessary safety precautions are in place. The term “special instructions” does not appear to be used elsewhere in the GHS, and it is not immediately clear whether it refers to part of the safety data sheet, to on-site rules/operating procedures prepared by the employer, or to other instructions. On the other hand, P202 refers to reading and understanding the safety precautions, but not to applying them in practice.

7. The considerations in paragraphs 3 to 6 above point to combining the existing P201 and P202 statements to convey the message that chemicals with these particularly hazardous classifications should not be used until all the available safety information has been read and understood, and the necessary safety precautions have been put in place. After discussion, including consideration of the wording at its face-to-face meeting in July 2018, the working group considered that an appropriate new combined statement to replace P201 and P202 is: **“Read and follow all safety instructions before use.”**

8. The proposed new precautionary statement would be applied to the same hazard classes and categories as applied now to both P201 and P202. To avoid confusion between the existing P201 and P202 in versions of the GHS up to and including the seventh revised edition, it is proposed to delete the current P201 and P202 and assign a new code, P203, to the new combined precautionary statement.

9. The existing condition for P103, **“Read carefully and follow all instructions”**, to omit where P202 is used, is updated to refer to P203 to ensure that where the new P203 is applied to consumer products only one of these precautionary statements applies.

10. The proposed changes to delete P201 and P202 and insert a new P203, together with the consequential changes elsewhere in Annex 3, are shown in informal document INF.8. The Sub-Committee may wish to note that work to improve medical response precautionary statements in Annex 3 is addressed in a separate working document (ST/SG/SC.10/C.4/2018/30).

Action

11. The Sub-Committee is invited to agree the proposed changes in paragraphs 7 to 10 above, as shown in informal document INF.8.
