



**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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Item 4 (d) of the provisional agenda

Hazard communication issues: miscellaneous

**Minor variations in “hazard” and “precautionary”
statements**

**Transmitted by the European Aerosol Federation (FEA), the Consumer
Specialty Products Association (CSPA), the International Paint and
Printing Ink Council (IPPIC) and the International Association for
Soaps, Detergents and Maintenance Product (A I S E)¹**

Introduction

1. Implementing the GHS, industry also starts facing practical problems with minor linguistic variations.
2. This paper describes the problems faced by industry and proposes that minor variations which do not affect the obvious meaning of the hazard (H) and precautionary (P) statements are acceptable.

Background

3. Many countries worldwide implement the GHS, but not at the same rhythm and obviously in many different languages.

¹ In accordance with the programme of work of the Sub-Committee for 2013–2014 approved by the Committee at its sixth session (see ST/SG/AC.10/40, para. 14, and ST/SG/AC.10/C.4/48, Annex IV, item 2(a)).

4. Compared to the official GHS texts in English, French, Spanish and Russian, various national implementations may present slight variations in the H and P statements to best fit national specificities.
5. H and P statements are also modified on a 2-year basis.
6. The Sub-Committee is the best place to find a global consensus.

Practical labelling concern

7. Any change in labelling requirements lead to a change in labelling (and Safety Data Sheets) with associated costs, not only for chemical manufacturers but also along the supply chain: adhesives, aerosols, detergents, paints... The cost impact can be from a cheap typo change on a paper label to be printed when needed to a more complex and costly layout change for direct printing on a metal aerosol container in predefined batch quantities. If several different changes happen at slightly different times, these costs are cumulative. These costs are generally totally ignore or underestimate by regulators, stating safety first.

8. Some labelling changes are needed and fully justified, but others are of editorial nature in a spirit of continuous improvements. These last changes in the GHS are not fundamental for user protection. All these changes could only be approved once at the same time, two approvals being separated by a sufficiently long time period.

9. Other labelling variations come from national implementations due to cultural/linguistic differences: the English is not the same in the United Kingdom and the United States of America, the Spanish is not the same in Spain, Argentina and Mexico, the French is not the same in France and in Canada. These minor linguistic variations however convey the same safety messages which can be understood by the users. Slight changes which do not affect the obvious meaning of the H and P statements may not become a non-tariff barrier to trade in strictly enforcing local linguistic language. Two examples (non-exhaustive):

H229: GHS (Spanish): *Contiene gas a presión: puede reventar si se calienta*, but EU CLP (Spanish): *Recipiente a presión: puede reventar si se calienta*.

P210: GHS (French): *Tenir à l'écart de la chaleur, des surfaces chaudes, des étincelles, des flammes nues et de toute autre source d'ignition. Ne pas fumer*, but EU CLP (French): *Tenir à l'écart de la chaleur, des surfaces chaudes, des étincelles, des flammes nues et de toute autre source d'inflammation. Ne pas fumer*.

10. Inevitably mistakes are included in national implementations of the long GHS text. Accepting minor variations on H and P statements will also allow the Industry to better cope with corrections in legal texts.

Proposal

11. All non-essential changes in H and P statements should only be adopted at the same time every 6 years.
12. Minor variations which do not affect the obvious meaning of the H and P statements should be acceptable by national authorities globally.

NOTE: *Transport of dangerous goods legislation already contains a similar provision. For example, paragraph 5.2.2.2.1 of the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR 2013) reads:*

“Labels shall satisfy the provisions below and conform, in terms of colour, symbols and general format, to the models shown in 5.2.2.2.2. Corresponding models required for other modes of transport, with minor variations which do not affect the obvious meaning of the label, are also acceptable.”
