



Secretariat

Distr.
GENERAL

ST/SG/AC.10/C.4/2002/12
29 May 2002

ENGLISH
Original: ENGLISH AND FRENCH

**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**

(Third session, 10-12 July 2002,
agenda item 2)

**GLOBALY HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS (GHS)**

**Additional provisions for the classification criteria
of dermal or dermal sensitizers**
Chapter 3.4 Dermal or dermal sensitizers

Transmitted by the experts from Canada and the United States of America

Introduction

Chapter 3.4, Respiratory or Skin Sensitization (ST/SG/AC.10/C.4/2001/22), paragraph 25, Footnote 5 to Table 1 reads:

"There has been considerable discussion about what to convey about sensitization effects to those exposed, and at what point it should be conveyed. While the current cut-off for mixtures is 1%, it appears that the major systems all believe information should be conveyed below that level. This may be appropriate both to warn those already sensitized, as well as to warn those who may become sensitized. This issue was not clear during the initial deliberations on the criteria for mixtures containing sensitizers, and thus has not been adequately discussed nor options explored.

Before the system becomes implemented, this issue should be revisited by the ECOSOC Subcommittee on the GHS as one of its first priorities. It should be noted that the sensitization criteria for substances will also have to be re-opened to consider this issue and the inclusion of new information and evolving testing approaches that addresses the question of strong sensitizers versus those that are weaker. Appropriate hazard communication should be considered along with the discussions on the criteria and the availability of an appropriate test method."

The purpose of this proposal is to address part of an issue of the cut-off/concentration limit used for the classification of mixtures when data are available for all or only for some components of the mixture.

Proposal

It is proposed that Table 1 of Chapter 3.4, Respiratory or Skin Sensitization (ST/SG/AC.10/C.4/2001/22), paragraph 25, be replaced with:

Ingredient Classified as:	Cut-off/concentration limits triggering classification of a mixture as:		
	Skin Sensitizer	Respiratory Sensitizer	
	All physical states	Solid/Liquid	Gas
Skin Sensitizer	≥ 0.1% (Note 1)	-	-
	≥ 1.0% (Note 2)	-	≥
Respiratory Sensitizer	-	≥ 0.1% (Note 3)	≥ 0.1% (Note 5)
	-	≥ 1.0 % (Note 4)	≥ 0.2% (Note 6)

Note 1: If a skin sensitizer is present in the mixture as an ingredient at a concentration between 0.1% and 1.0%, both an SDS and a label would generally be expected. The label warning for skin sensitizers between 0.1% and 1.0% may differ from the label warning for skin sensitizers $\geq 1.0\%$, depending on competent authority requirements. While the current cut-off values reflect existing systems, all recognize that special cases may require information to be conveyed below that level.

Note 2: If a skin sensitizer is present in the mixture as an ingredient at a concentration of $\geq 1.0\%$, both an SDS and a label would generally be expected.

Note 3: If a solid or liquid respiratory sensitizer is present in the mixture as an ingredient at a concentration between 0.1% and 1.0%, both an SDS and a label would generally be expected. The label warning for solid or liquid respiratory sensitizers between 0.1% and 1.0% may differ from the label warning for solid or liquid respiratory sensitizers $\geq 1.0\%$, depending on competent authority requirements. While the current cut-off values reflect existing systems, all recognize that special cases may require information to be conveyed below that level.

Note 4: If a solid or liquid respiratory sensitizer is present in the mixture as an ingredient at a concentration of $\geq 1.0\%$, both an SDS and a label would generally be expected.

Note 5: If a gaseous respiratory sensitizer is present in the mixture as an ingredient at a concentration between 0.1% and 0.2%, both an SDS and a label would generally be expected. The label warning for a gaseous respiratory sensitizers between 0.1% and 0.2% may differ from the label warning for a gaseous respiratory sensitizers $\geq 0.2\%$, depending on competent authority requirements. While the current cut-off values reflect existing systems, all recognize that special cases may require information to be conveyed below that level.

Note 6: If a solid or liquid respiratory sensitizer is present in the mixture as an ingredient at a concentration of $\geq 0.2\%$, both an SDS and a label would generally be expected.

Justification

The proposal addresses the cut-off/concentration limit issue raised during the ILO Working Group on Hazard Communication deliberations.
