

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

6 December 2010

Twentieth session

Geneva, 7–9 December 2010

Item 4 (a) of the provisional agenda

Implementation of the GHS-Implementation issues

Comments on ST/SG/AC.10/C.4/2010/7: Proposal to address potential issues associated with the adoption of “Corrosive to metals” for supply/use situations

Transmitted by the expert from Australia

Background

1. At the 19th session of the Sub-Committee, AISE highlighted in INF.31 that some substances and mixtures will be classified as corrosive to metals while not being classified as corrosive to eyes and/or skin. In this case, the use of the same pictogram than the one used for health effects could be misleading and not relevant for the end-user.
2. The International Association for Soaps, Detergents and Maintenance Products (AISE), the Soap and Detergent Association (SDA), the International Paint and Printing Ink Council (IPPIC) and the European Chemical Industry Council (CEFIC) have submitted to the 20th session document ST/SG/AC.10/C.4/2010/7 with a proposal to allow all the label elements linked to the hazard “corrosive to metals” to be omitted from the label of these substances or mixtures addressed to the end-user.

Proposal

3. It is proposed to amend the text of 1.4.10.5.5 proposed in ST/SG/AC.10/C.4/2010/7 as follows (additional text is underlined) to ensure that in order to ensure that application of this approach is based on risk and only applies to substances or mixtures for consumer use:

“Where a substance or mixture is classified as corrosive to metals but not corrosive to skin and/or eyes, the competent authority may choose to allow the label elements (hazard pictogram, signal word, and the hazard statement and precautionary statements where a risk assessment warrants it) linked to corrosive to metals to be omitted from the label of such substances or mixtures which are in the finished state, ~~intended for the final user~~ as packaged for consumer use. The hazard information omitted from the label for the classification “corrosive to metals” should be included in the SDS.”