

**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**

**9 December 2011**

**Twenty-second session**

Geneva, 7 (p.m) – 9 December 2011

Item 4 (a) of the provisional agenda

**Implementation of the GHS:**

**Implementation issues**

**Summary report on the work of the Practical Classification  
Issues informal correspondence group**

**Transmitted by the expert from the United States of America on behalf  
of the informal group**

1. The Practical Classification Issues informal correspondence group met on 8 December 2011 and discussed the following proposals:

- (a) provide possible options for the incorporation of the specific items required by IMO SDS for MARPOL Annex I cargoes and marine fuel oils, in accordance with IMO Resolution MSC.286.86, into the GHS SDS;
- (b) example illustrating the conditions for the application of bridging principles using serious eye damage/eye irritation in vitro data;
- (c) provide clarification that the terms “cut-off values/concentration limits” are intended to be used interchangeably;
- (d) propose editorial revisions to clarify the use of the terms “no data available”, “not applicable”, and “not classified”; and
- (e) provide clarity on the implication of the assumption in Note 4 of Table 4.1.1 that “when no useful data on degradability are available...the substance should be regarded as not rapidly degradable”.

2. With regards to (a), the group agreed to progress option #2, to add an appendix to GHS Annex 4 “guidance on the preparation of SDS” placing the information from Resolution MSC.286.86 that goes beyond the GHS, in the appropriate GHS SDS sections. The group also agreed to add a reference to MSC.286.86 in chapter 1.5 as new paragraph 1.5.1.3.

3. Regarding proposal (b), the group agreed to the proposed example illustrating the conditions for the application of bridging principles using serious eye damage/eye irritation in vitro data. Experts provided suggested editorial amendments to be included in the next revision of the proposal.

4. With regards to (c), the group adopted the proposal without modification.

5. Proposal (d) received support of the group. However, some experts suggested that areas of the text required clarification and agreed to provide clarifying amendments to the text for the next revision. In addition, one expert suggested that the scope of the proposal be expanded to include the definitions “no data available”, “not applicable”, and “not

classified” to be included in Chapter 1.2 of the GHS. Another expert suggested that the proposal take into consideration not only substances but also mixtures.

6. The group decided no further action is required to address proposal (e). Experts concluded that the criteria presented in Note 4 of Table 4.1.1 are adequate and appropriate as currently stated.

7. The expert from the United States of America will present the revised proposals as an informal paper for the 23rd Session.

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