

UN/SCEGHS/4/INF.19

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals
(Fourth session, 9-11 December 2002, agenda item 2)

Editorial and Technical Corrections to the GHS and Document ST/SG/AC.10/C.4/2002/16 and Addenda

Transmitted by the experts from the United States of America

1. The following chart details editorial and technical corrections to the GHS document and supplements Document ST/SG/AC.10/C.4/2002/16 and Addenda.

Document	Paragraph	Sentence/Bullet	Change
2002/16	Foreword, Page 3, Paragraph 7	Sentences 3-4	"...national programs for the sound management of chemicals, which in turn will lead to safer conditions for the global population, while allowing...." (clarity and consistency)
2002/16/Add.1	1.1.3.1.5	Heading	Italicize " <i>Building block approach</i> "
	1.1.3.1.5.3	Last sentence	"Notwithstanding...countries' requirements for...."(missing word)
	1.1.4.1	Sentence 3	"...national policies, while...." (missing word)"
	1.2	GESAMP	End after "Protection," or spell out all acronyms
		Hazard category	Delete period before "e.g.,"
		Hazard class	Add comma after "solid"
		Organic peroxide	Add "s" to "formulation"
		NOTE:	EN ISO needs to be defined here or explained in 1.4.10.5.5.3
	1.3.1.1.2	(a), (c)	Standardize capitalization; (c) (ii) "non-consensus"
	1.3.1.2	Sentence 2	Add comma after first "elements" and delete comma after second "elements"
	1.3.2.4.6	Sentence 3	"...skin irritation/corrosion and eye irritation/serious eye damage"
	1.3.3.2		Delete "The;" do not capitalize "Concentration"
	1.4.1.2		Capitalize "ghs"
	1.4.1.5		Capitalize "Sub-Committee"
	1.4.10.2	Last two sentences	At this point in the document, this is confusing. Suggest either "Special arrangements to take into account the

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			information needs of different target audiences are further described....” (preferred); or “There are...which apply to the labeling of mixtures containing certain percentage concentrations of hazardous ingredients. These are described further....and in Chapters 3.6 (Carcinogenicity), 3.7. (Reproductive Toxicity) 3.8 (Target Organ/Systemic Toxicity, Single Exposure) and 3.9. (Target Organ/Systemic Toxicity, Repeat Exposure)>”
	1.4.10.5.1		Add “s” to “Good”
	1.4.10.5.5.2		“...risk-based....”;delete parenthesis before “Target”
	1.4.10.5.5.3		Explain abbreviation EN ISO here, or define in Chapter 1.2
	1.5.3.1.1		Add “s” to “limit”
	Page 38	Footnote 2	Needs reconsideration in light of resolution of sensitization issue for the purposes of the initial GHS
	1.5.3.3.3		Add “s” to ISO and ANSI organization names
	Table 1.5.2		Box 3, right, bold “Mixture”
2002/16/Add.3	3.1.3.3	(b)	Space and indent before second “-“
	3.1.3.5		Delete “.1” in heading
	3.1.3.5.7		“non-aerosolised”
	3.1.3.6.1		Subscripts did not come out in formula
	3.1.3.6.2.3		Subscripts did not come out in formula
	3.2.2.1	Sentence 2	Change “classes” to “categories”
	3.2.3.3.5		“those data”
	3.2.3.3.6		Capitalization in concluding parenthetical; reference should be to 1.3.3.2
	Table 3.2.4		Row and column headings should be in English
	Decision logic 3.2.1		Lower left box on page 26 references non-existent 3.2.1.1; should be 3.2.1
	Decision logic 3.2.1		Top left box on page 27 references non-existent 3.2.1.2; should be 3.2.1
	Decision logic 3.2.2		“the additivity principle”; delete Roman numerals before bullets on page 29 as unnecessary and possibly confusing
	3.3.2.2	2nd paragraph	Change “classes” to “categories”
	Figure 3.3.1		Right above Step 8, the arrow that points from “Not corrosive” should instead appear in Step 8, pointing from “1 rabbit eye test”
	3.3.2.8		First reference under Table should be to 1.1.2.5 (c)
	3.3.3.2.4	Sentences 1-2	Change “subcategory” to “category” in first sentence. Change “category” to

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			“subcategory” in second sentence. Irritation is the category that is subdivided.
	3.3.3.3.5		“...those data (see also paragraph 1.3.3.2 “Use of cut-off values/concentration limits”)
	3.3.3.3.6		“...(see also paragraph 1.3.3.2 “Use of cut-off values/concentration limits”)
	Decision logic 3.3.2		Capitalization in note 7; note 8 “ <i>If the mixture also contains other corrosive or irritant ingredients...</i> ”; delete Roman numerals before bullets on page 45 as unnecessary and possibly confusing
	Table 3.4.1		Missing the \geq signs
	Decision logic 3.4.2		Should use “skin” in the 3 rd line, right box, and left box above “not classified.” Signal word in right boxes should be “Warning” not “Danger.”
	3.5	Page 63	Needs heading: “ <i>Decision logic 3.5.2 for mixtures</i> ”
	Decision logic 3.5.2		<p>The current draft directs the user back to a question about the quality of data on the mixture as a whole after answering the question of whether bridging rules can be applied. This is circular and unworkable, since the user of the decision logic had to conclude that there were no data on the mixture as a whole in order to reach the question of whether bridging rules can be applied.</p> <p>(A) Arrows should flow (1) from “can bridging principles to applied?” through “yes” to “classify in appropriate category”; and (2) from “are the test results on the mixture...?” through “no” to “can bridging principles be applied?”</p> <p>(B) Add a footnote to the box “Can bridging principles be applied?” :</p> <p>“²If data on another mixture are used in the application of bridging principles, the data on the original mixture must be conclusive in accordance with paragraph 3.5.3.1.”</p>
	3.6.2.4		Delete “.1” at end
	Decision		The current draft directs the user back

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	logic 3.6.2 for mixtures		<p>to a question about the quality of data on the mixture as a whole after answering the question of whether bridging rules can be applied. This is circular and unworkable, since the user of the decision logic had to conclude that there were no data on the mixture as a whole in order to reach the question of whether bridging rules can be applied.</p> <p>(A) Arrows should flow (2) from “can bridging principles to applied?” through “yes” to “classify in appropriate category”; and (2) from “are the test results on the mixture...?” through “no” to “can bridging principles be applied?”</p> <p>(B) Add a footnote to the box “Can bridging principles be applied?” : “²If data on another mixture are used in the application of bridging principles, the data on the original mixture must be conclusive in accordance with paragraph 3.6.3.1.”</p>
	Page 72		<p>Throughout, 3.6.5.2 should be 3.6.5.3.</p> <p>Note 3 is missing a word; should be “...additional information .”</p>
	Table 3.7.1		Note 4 should also be italicized
	Table 3.7.2		Hazard statements should be corrected by deleting the “or” between the two parentheticals and revising the second parenthetical to read “(state the route of...)” (This is correct in the Annexes.)
	Decision logic 3.7.2 for mixtures		<p>The current draft directs the user back to a question about the quality of data on the mixture as a whole after answering the question of whether bridging rules can be applied. This is circular and unworkable, since the user of the decision logic had to conclude that there were no data on the mixture as a whole in order to reach the question of whether bridging rules can be applied.</p> <p>(A) Arrows should flow</p>

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			<p>(3) from “can bridging principles to applied?” through “yes” to “classify in appropriate category”; and (2) from “are the test results on the mixture...?” through “no” to “can bridging principles be applied?”</p> <p>(B) Add a footnote to the box “Can bridging principles be applied?” :</p> <p>“²If data on another mixture are used in the application of bridging principles, the data on the original mixture must be conclusive in accordance with paragraph 3.7.3.1.”</p>
	Figure 3.8.1		Reference in non-bold text under Category 2 should be “(see 3.8.2.9)”
	3.8.2.9.4	Sentence 2	Add greater than symbol: “...above a guidance value, e.g. at or above 2000 mg/kg...”
	3.9.1.6	Sentence 1	Italicize “Target”
	3.9.2.9.9		Add greater than symbol in 2 nd sentence, “...above a guidance value, e.g. at or above 100 mg/kgbw/day...”
	3.10.1.7.2		Annex 9 is not the OECD Testing and Assessment Document; it is the protocol that needs to be validated through OECD. Delete “as reproduced in Annex 9 in this document.”
2002/16 Add.7	A4.2.2		This should be a bold heading as in previous version.
2002/16 Add.10	A.7.1		Change “endpoint” to “class” in first sentence. Delete last sentence as there are no data that would call for classification as a respiratory tract irritant.
	A.7.4.1		Move text above A.7.4.1.1 to section on TOST (current A.7.4.6) rather than confuse it with acute toxicity.
	A.7.4.3	Table, first row	Delete last sentence specific reference to EU protocol. The point about dose is covered in introductory text.
	A.7.4.4.		Delete, as this is not a separate hazard class in the current GHS document and may confuse.
	A.7.4.6		<p>(A) Retitle, “Target organ/systemic toxicity following single or repeat exposure.”</p> <p>(B) Retitle A.7.4.6.1 as “Toxicity”</p>

Document	Paragraph	Sentence/Bullet	Change
			<p><i>following single exposure</i>” and insert current text from A.7.4.1.1, adding “/single exposure” after “TOST.” This should be numbered (C) Insert new title A.7.4.6.2. “Toxicity following repeated exposure” (and renumber current A.7.4.6.1-3 as A.7.4.6.2.1-3).</p>
	Current A.7.4.6.1		Add “or human evidence” after “studies.”

2. In addition, the document should be reviewed to standardize use of either “Competent Authority” or “competent authority”; italicize *in vitro* and *in vivo* consistently throughout; standardize hyphenation and capitalization (e.g. of Sub-Committee) throughout; and review consistency in use of italics, underlining and boldface, some of which are noted above.