

UN/SCEGHS/3/INF.10

**Sub-Committee of Experts on the Globally
Harmonized System of Classification
and Labelling of Chemicals**
(Third session, 10-12 July 2002,
agenda item 2)

Amendment to the GHS

Transmitted by CEFIC

This document refers to proposed amendments to document ST/SG/AC.10/C.4/2001/22.

Proposal 1

Background

OECD issued a Corrigendum to OECD Document ENV/JM/MONO(2001)6. The first correction in this Corrigendum has not been incorporated into ST/SG/AC.10/C.4/2001/22.

Proposal

CHAPTER 3.2

On page 23 in Figure 1, the text against Step 8 - Negative response needs amending in the centre column to either "Not Irritant" as in the Corrigendum, or "Non-Irritant response" the same as for Step 10 in the same figure.

Proposal 2

Background

CHAPTER 3.2

Note (e) to figure 1 on page 23 states that "*there are no internationally accepted validated in vitro methods of dermal corrosion*", whilst the last sentence of paragraph 14 on page 26 refers to "use of an appropriate validated *in vitro* test". These references appear to contradict each other, and in any case may be obsolete in view of OECD guideline 431.

Proposal

If OECD can confirm that Test Guideline 431 has been accepted, it is proposed that Note (e) to figure 1 on page 23 is amended to "*An example of an internationally accepted validated in vitro test method for dermal corrosion is OECD Guideline 431*"

Proposal 3

Background

CHAPTER 3.3

On page 36 in paragraph 7 on line 6, the text "... buffering capacity **is known**." is unclear and possibly confusing. This text corresponds to the text on page 40 in regard to Step 3 of figure 1 which is also unclear.

Proposal

We propose that

(i) The text on page 36 in paragraph 7 on line 6 is amended to replace the text " ... *buffering capacity is known*" with " ... *especially when associated with significant buffering capacity*", or alternatively the sentence in paragraph 7 containing this text "*Likewise, pH extremes like ≤ 2 and ≥ 11.5 , may produce serious eye damage, especially when buffering capacity is known*" could be replaced with the proposed text in (ii) below; and

(ii) The text on page 40 in regard to Step 3 of figure 1 is replaced with "*pH extremes like < 2 and > 11.5 may indicate strong local effects, and should be considered as leading to serious damage to eyes (Category 1). This may be modified by consideration of acid or alkali reserve.*"
