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**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

Fifteenth session  
Geneva, 9-11 July 2008  
Item 2 (b) of the provisional agenda

**UPDATING OF THE SECOND REVISED EDITION OF THE GLOBALLY HARMONIZED  
SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)**

Health hazards

Amendments to Chapter 3.10 (section 3.10.1)

Transmitted by the International Petroleum Industry Environmental Conservation Association  
(IPIECA)<sup>\*/</sup>

**Introduction**

1. Chapter 3.10 of Part 3 of the GHS (Rev. 2, 2007) mentions solids in the context of aspiration hazards.
2. Aspiration is defined in paragraph 3.10.1.2 as “... the entry of a liquid or a solid chemical product directly through the oral or nasal cavity, or indirectly from vomiting into the trachea and lower respiratory system.”

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<sup>\*/</sup> *In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.4/24, Annex 2 and ST/SG/AC.10/34, para. 14).*

3. The classification criteria for aspiration hazards are based on the kinematic viscosity of a substance and hence related to a physicochemical property that is defined for liquids.
4. A solid substance that had a small enough particle size could reach the alveoli and cause damage comparable to the severe acute effects described in paragraph 3.10.1., i.e. "... chemical pneumonia or varying degrees of pulmonary injuries ...". However, the GHS does not provide guidance on the physicochemical properties of solids that may be related to aspiration hazards and does therefore not allow classification for this hazard.
5. Therefore, for the avoidance of doubt it should be stated in Chapter 3.10 that the classification of substances for aspiration hazards in accordance with Chapter 3.10 applies exclusively to liquid substances or mixtures.

### **Proposal**

6. IPIECA proposes to add a new paragraph 3.10.1.6 and proposes the following text:

“3.10.1.6 Although the definition of aspiration in 3.10.1.2 includes the entry of solids into the respiratory system, GHS classification criteria for aspiration hazards are intended to be applied to liquid substances and mixtures only.”

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