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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, 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

Proposal for amendment of Chapter 3.8: Category 3 specific target organ toxicants, single exposure

Transmitted by the expert from Australia

Introduction

1. Australia supports the principles detailed in ST/SG/AC.10/C.4/2008/3 and believe that the decision logics in chapter 3.8, together with the text in subsection 3.8.2.2 and Table 3.8.3, of the GHS could be improved by providing further clarification that within a Category 3 classification, respiratory irritation and narcotic effects are independent health hazards and a separate assessment needs to be conducted for each.
2. This point has already been raised in previous informal papers submitted to the 13th session of the UNSCEGHS by the expert from the United States of America (UN/SCEGHS/14/INF.24), and the 14th session of the UNSCEGHS by DG Enterprise, DG Environment and DG Joint Research Centre of the European Commission (UN/SCEGHS/14/INF.24).
3. The aim of this informal paper is to provide greater clarity in classification requirements for Category 3 specific target organ toxicants, single exposure, through editorial clarifications to chapter 3.8.

Background

4. Respiratory tract irritation and narcosis are entirely different effects. However, in chapter 3.8, it is not clear from the classification criteria for substances in Category 3, as provided in sub-section 3.8.2.2, that classification can be for respiratory tract irritation or narcotic effects, or both. Furthermore, using the text for hazard statements as provided in Table 3.8.3 (Label elements for specific target organ toxicity after single exposure) it could be assumed that a substance or mixture can only be classified for either, not both. Similarly, the decision logic for specific target organ toxicity single exposure should reflect that classification for both respiratory tract irritation and narcotic effects, or both, is possible. Consequently, it is proposed that the Sub-Committee consider amending sub-section 3.8.2.2, Table 3.8.3 and the decision logics as proposed hereafter.

Proposal

5. Insert the following text after heading 3.8.2.2 (Substances of Category 3) and immediately before paragraph 3.8.2.2.1 that reads:

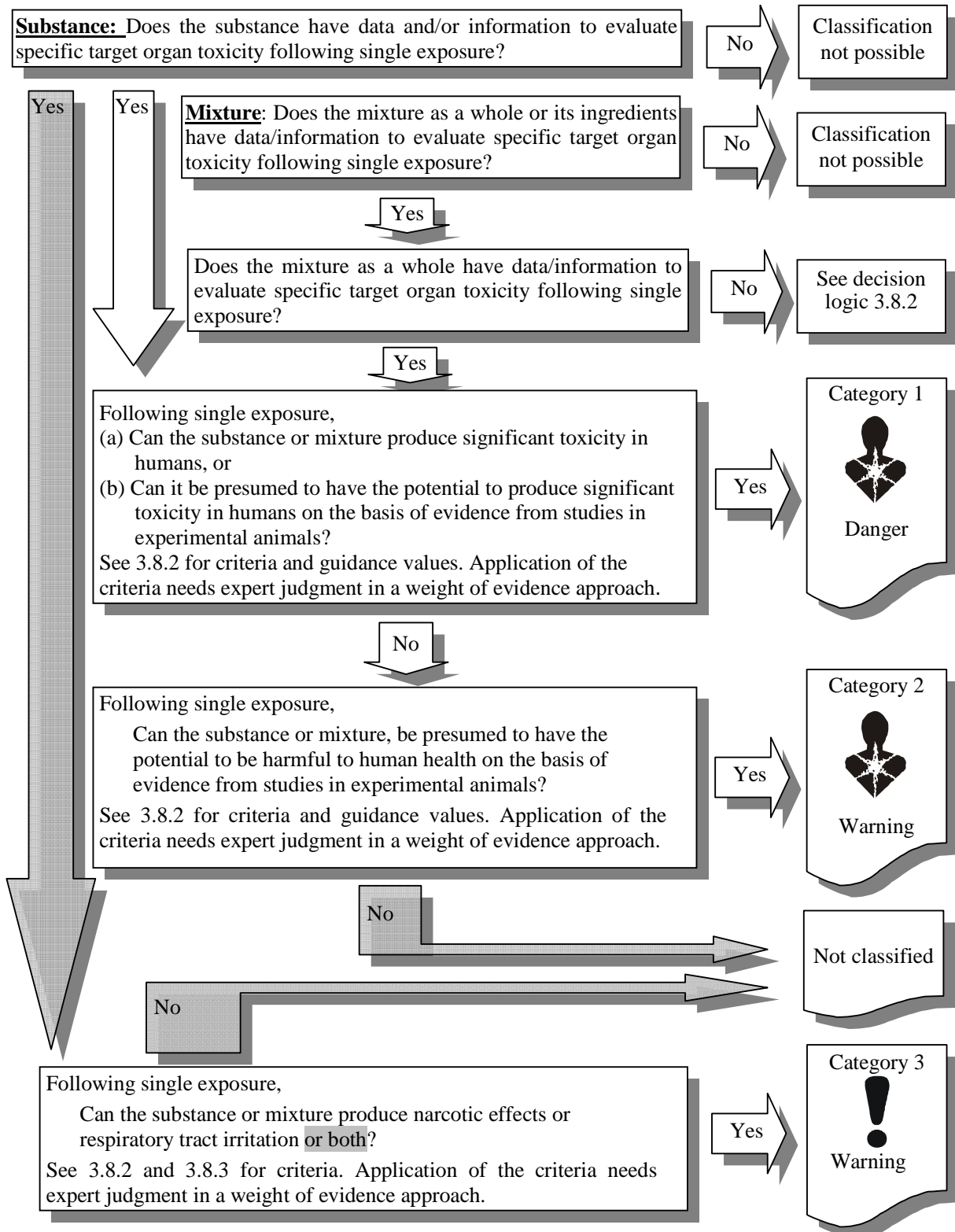
Respiratory irritation and narcotic effects are independent health hazards and a separate assessment needs to be conducted for each. Substances can be classified in Category 3 for either respiratory tract irritation or narcotic effects, or both, according to the criteria provided below.

6. Insert the following text (changes shaded in grey) in Table 3.8.3:

	Category 1	Category 2	Category 3
Symbol	Health hazard	Health hazard	Exclamation mark
Signal word	Danger	Warning	Warning
Hazard statement	Causes damage to organs (or state all organs affected, if known) (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	May cause damage to organs (or state organs affected, if known) (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	May cause respiratory irritation; or May cause drowsiness or dizziness; or May cause respiratory irritation; and May cause drowsiness or dizziness

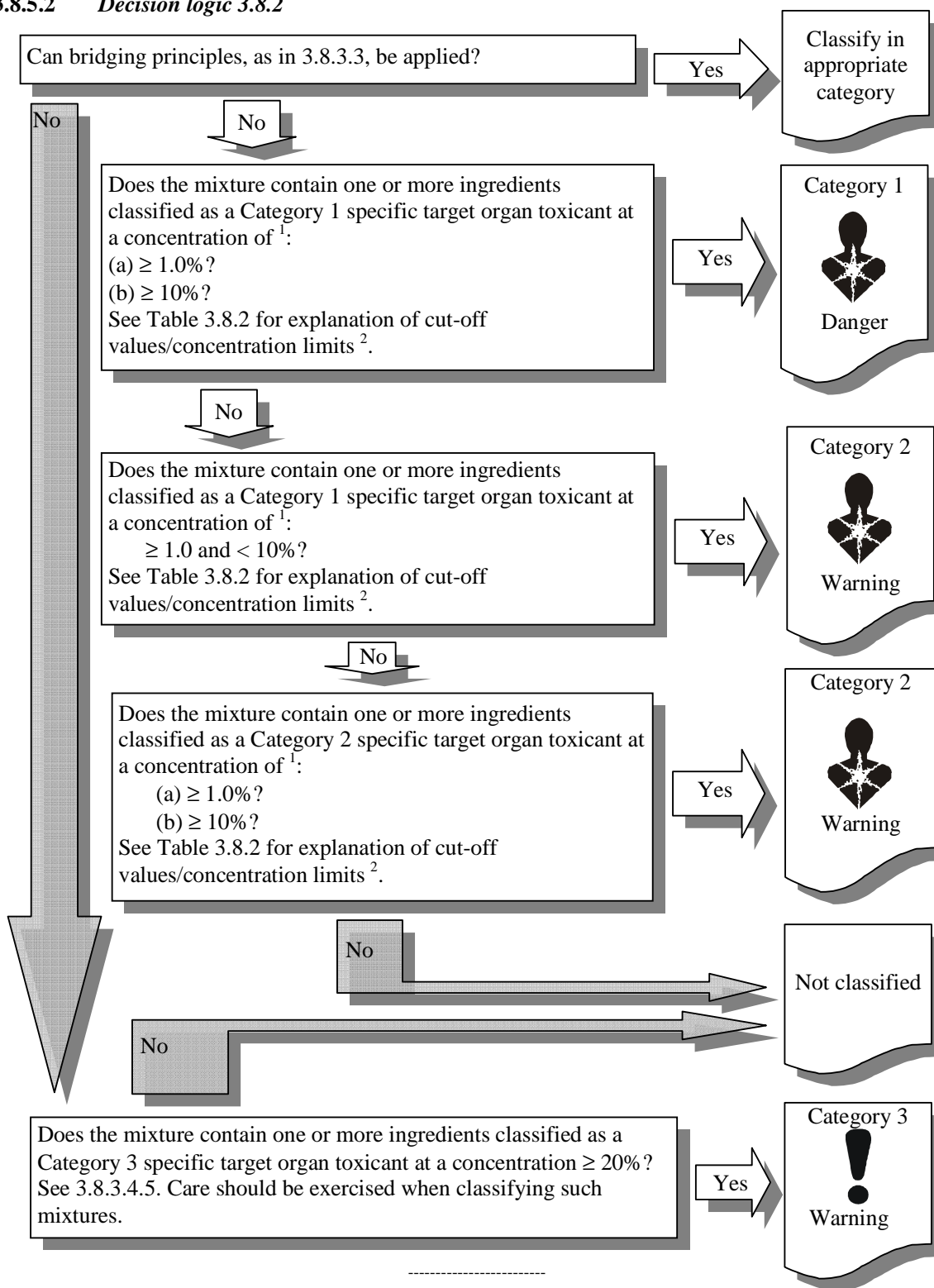
7. The decision logic as amended by the expert from Germany's proposal (ST/SG/AC.10/C.4/2008/3) is provided below with the proposed changes from Germany visible as grey arrows. It is proposed that the following text also be inserted (changes shaded in grey):

3.8.5.1 *Decision logic 3.8.1*



(Cont'd on next page)

3.8.5.2 Decision logic 3.8.2



¹ See 3.8.2 of this Chapter and “The use of cut-off values/concentration limits” in Chapter 1.3, para 1.3.3.2.

² See 3.8.3.4 and Table 3.8.2 for explanation and guidance.