

## 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

Seventeenth session  
Geneva, 29 June – 1 July 2009  
Item 4 of the provisional agenda

### IMPLEMENTATION ISSUES

Transmitted by the expert from the United States of America on behalf of the informal correspondence group on practical classification issues

#### **Purpose**

1. The purpose of this document is to present a proposal for the continued work of the formerly named mixtures correspondence group, now named the informal correspondence group for practical classification issues. The goal of this newly re-named group is to determine if the GHS criteria are uniformly understood and to develop recommendations for clarifying the criteria where inconsistency is observed.
2. As described in UN/SCEGHS/16/INF.39, the work that will be undertaken by this correspondence group will be to clarify the application of the GHS classification criteria for substances and mixtures. This will be accomplished through, for example, development of proposals to modify text in the GHS document; development of worked examples illustrating application of the criteria; and addressing any related hazard communication issues.

#### **Background**

3. The work to consider the classification criteria for mixtures was initiated in 2005 to evaluate the application of the GHS criteria to substances (UN/SCEGHS/10/INF.5) and was eventually extended to mixtures. This work is described in four previous documents submitted to the Sub-Committee (UN/SCEGHS/13/INF.6; UN/SCEGHS/15/INF.27; ST/SG/AC.10/C.4/2008/23; and UN/SCEGHS/16/INF.39).

#### **Proposal for ongoing work**

4. A meeting of the informal correspondence group was held in December 2008 surrounding the biannual meeting of the Sub-Committee. Based primarily on the discussions in that meeting and on e-mail correspondence, the following work items are proposed by the informal

correspondence group for this current biennium. Many of the work items below are drawn from the document submitted by the Implementation Working Group in December 2008 (ST/SG/AC.10/C.4/2008/22). Paragraph references refer to this document:

- (a) Provide clarity for the conditions necessary for the use of bridging principles through the provision of agreed examples. (Issue 2.2 of Implementation Working Group document);
- (b) Review the description of the categories of hazard (e.g., Categories 1 and 2) and sub-categories (e.g. Categories 1A or 1B) to address inconsistencies between the tables, figures, and decision logics within the chapters. This applies to Chapters 3.5 (Germ cell mutagenicity), 3.6 (Carcinogenicity) and 3.7 (Reproductive toxicity) (Issue 3.14 of the Implementation Working Group document);
- (c) Provide clarification of paragraph 1.3.2.3 as related to a hierarchy for carcinogens, mutagens, and reproductive toxins. (Issue 3.15 of Implementation Working Group document);
- (d) Provide clarification regarding the communication of classification information for substances or mixtures that fall into two separate categories within the same hazard class. This is a possible outcome for acute toxicity and for reproductive toxicity. Further description for each is below. (Issue 3.16 of Implementation Working Group document);
  - (i) a chemical is classified as both an oral acute toxicity Category 1 and a dermal acute toxicity Category 4. Is the chemical classified for the most severe hazard (Category 1 acute toxicity) or for both routes of exposure (oral acute toxicity Category 1 and a dermal acute toxicity Category 4)?
  - (ii) if one ingredient in a mixture is classified as Category 1A for effects on fertility and another ingredient is classified as Category 2 for developmental effects, should the mixture classification be considered a Category 1, Category 1A or Category 1A/Category 2 for reproductive toxicity?
- (e) Provide an example of the application of the classification criteria for the aquatic toxicity of mixtures.
- (f) Discuss GHS coverage of simple asphyxiation.

While it is likely that many regulatory systems cover this hazard, which can lead to death, Annex 4, paragraph A4.3.2.3 of the GHS includes “suffocation” as not resulting in classification. Should this hazard be included in the GHS via editorial changes to the text, or does this need to be referred to the OECD for a separate classification scheme? For instance, can this be included in Chapter 3.1 in a fashion similar to the way this chapter addresses “corrosive to the respiratory tract” (see paragraph 3.1.2.6.5, GHS, Rev.2)? Alternatively, is it reasonable to include this hazard in Chapter 3.8, given the language regarding “non lethal target organ

toxicity.” Was the language in 3.8.1.1 (GHS, Rev.2) intended to limit application of the criteria to chemicals that cannot result in death upon a single exposure or was the language intended merely to exclude those chemicals already classified under Chapter 3.1? The term “simple asphyxiant” is a hazard for gases such as carbon dioxide, nitrogen, methane, and others.

### **Conclusion**

5. The informal correspondence group proposes these items for the current biennium and welcomes discussion by the Sub-Committee regarding this work.

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