

## 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

30 November 2010

### Twentieth session

Geneva, 7–9 December 2010

Item 4 (a) of the provisional agenda

**Implementation of the GHS – Implementation issues**

## Comments on ST/SG/AC.10/C.4/2010/7

### Transmitted by the expert from France

### Background

1. At the 19<sup>th</sup> session of the Sub-Committee, AISE highlighted in INF.31 that some substances and mixtures will be classified as corrosive to metals while not being classified as corrosive to eyes and/or skin. In this case, the use of the same pictogram than the one used for health effects could be misleading and not relevant for the end-user.
2. The International Association for Soaps, Detergents and Maintenance Products (AISE), the Soap and Detergent Association (SDA), the International Paint and Printing Ink Council (IPPIC) and the European Chemical Industry Council (CEFIC) have submitted to the 20<sup>th</sup> session document ST/SG/AC.10/C.4/2010/7 with a proposal to allow all the label elements linked to the hazard “corrosive to metals” to be omitted from the label of these substances or mixtures addressed to the end-user.

### Comments




3. The expert from France understands the issue in question. Nevertheless he does not agree with this proposal because, as a matter of principle, each significant hazard should lead to a labelling without prejudging of the kind of users of the substance or mixture.
4. However, there would be some merit to distinguish the two hazards:
  - corrosive to metals;
  - corrosive to skin/eyes.
5. It would probably not be so complicated to introduce a different pictogram for each case, on the basis of the existing pictogram, and without changing the final number of pictograms on the label. An idea of this is shown in the annex.

### Proposal

6. The expert from France does not propose a full text for adoption since he believes that it would be premature to take a decision on this matter and proposes to continue this discussion during the next biennium on the basis of a different set of pictograms.

**Annex**

**Proposed pictograms for corrosivity**

CORROSIVE TO METALS <b>and</b> SKIN/EYES	CORROSIVE TO METAL (only)	CORROSIVE TO SKIN/EYES (only)
		

The same distinction should be made with the transport pictogram:

CORROSIVE TO METALS <b>and</b> SKIN/EYES	CORROSIVE TO METAL (only)	CORROSIVE TO SKIN/EYES (only)
		