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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**

Twenty-seventh session
Geneva, 2 – 4 July 2014
Item 3 (b) of the provisional agenda
Classification criteria and related hazard communication: practical classification issues

Proposals to address issues from the programme of work for the practical classification issues correspondence group

Transmitted by the expert from the United States of America on behalf of the informal correspondence group on practical classification issues[1]

Purpose

1.   By way of this document, the informal correspondence working group on practical classification issues (PCI) is providing recommendations to clarify classification criteria in the GHS.

Background

2.   During the twenty-sixth session, the PCI informal group submitted an informal document to the Sub-Committee (INF.18), providing an update on the work undertaken by the group. The PCI informal group met surrounding the Sub-Committee meeting to further discuss the proposals presented in informal document INF.18. Based on feedback on the information document, the PCI informal group has developed the proposed editorial changes to the GHS as provided in this document.

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[1] In accordance with the programme of work of the Sub-Committee for 2013–2014 approved by the Committee at its sixth session (see ST/SG/AC.10/40, para. 14, and ST/SG/AC.10/C.4/48, Annex IV, item 2(a)).

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Proposal

3.   The correspondence group invites the Sub-Committee to consider for adoption the recommendation editorial amendments to the GHS as set forth in the Annex to this document.

Annex

Proposed editorial amendments to the GHS text

1. PCI correspondence group item:

Review Chapter 3.8, "Specific target organ toxicity-single exposure" and determine if the concept of "relevant ingredient" is needed in this chapter. The additivity principle was introduced in section 3.8.3.4.5, but a "relevant ingredient" for this procedure has not been established.

Proposed recommendation:

Insert a new paragraph 3.8.3.4.6 as follows:

"3.8.3.4.6   In cases where the additivity approach is used for Category 3 ingredients, the "relevant ingredients" of a mixture are those which are present in concentrations ≥1% (w/w for solids, liquids, dusts, mists, and vapours and v/v for gases), unless there is a reason to suspect that an ingredient present at a concentration <1% is still relevant when classifying the mixture for respiratory tract irritation or narcotic effects."

2. PCI correspondence group item:

Make correction to the heading in the left column in Table 3.7.1 from "Ingredients classified as" to "Ingredient classified as". The current text is confusing and may suggest that the additivity principle applies.

Proposed recommendation:

In the heading of Table 3.7.1, first column, replace "ingredients classified as" with "ingredient classified as".

3. PCI correspondence group item:

Provide clarification regarding the untested mixture criteria for aspiration hazards. Specifically, clarify that the approach is additive, and also update the criteria to include the concept of "Relevant Ingredients" since this is an additivity approach.

Proposed recommendation:

Amend paragraphs 3.10.3.3.1 through 3.10.3.3.2.3 to read as follows:

"3.10.3.3.1   The "relevant ingredients" of a mixture are those which are present in concentrations ≥ 1%.

3.10.3.3.2   *Category 1*

3.10.3.3.2.1   A mixture is classified as Category 1 when the sum of the concentrations of Category 1 ingredients is ≥ 10%, and the mixture has a kinematic viscosity of ≤ 20.5 mm^2/s, measured at 40°C.

3.10.3.3.2.2   In the case of a mixture which separates into two or more distinct layers, the entire mixture is classified as Category 1 if in any distinct layer the sum of the concentrations of Category 1 ingredients is ≥ 10%, and it has a kinematic viscosity of ≤ 20.5 mm^2/s, measured at 40°C.

3.10.3.3.3   *Category 2*

3.10.3.3.3.1   A mixture is classified as Category 2 when the sum of the concentrations of Category 2 ingredients is ≥ 10% and the mixture has a kinematic viscosity ≤ 14 mm^2/s, measured at 40 °C.

3.10.3.3.3.2   In classifying mixtures in this category, the use of expert judgment that considers surface tension, water solubility, boiling point, volatility is critical and especially when Category 2 substances are mixed with water.

3.10.3.3.3.3   In the case of classifying a mixture which separates into two or more distinct layers, the entire mixture is classified as Category 2 if in any distinct layer the sum of the concentrations of Category 2 ingredients is ≥ 10%, and it has a kinematic viscosity of ≤ 14 mm^2/s, measured at 40°C.".

4.   PCI correspondence group item:

Propose updated text in sections 4.1.3.5.5.3 and 4.1.3.5.5.4 to reflect that the "M-factor" must be taken into consideration when applying the summation method. Tables 4.1.3 and 4.1.4 appropriately illustrate this concept; however, the text describing the summation method criteria in Sections 4.1.3.5.5.3 and 4.1.3.5.5.4 do not currently include application of the "M-factor".

Proposed recommendation:

Amend sections 4.1.3.5.5.3 and 4.1.3.5.5.4 as follows:

Insert the text "multiplied by their corresponding M factors" to the following paragraphs:

4.1.3.5.5.3.1: Second sentence after "ingredients"
4.1.3.5.5.3.2: Second sentence after "Acute 1"
4.1.3.5.5.3.3: Second sentence after "Acute 1"
4.1.3.5.5.4.1: Second sentence after "ingredients"
4.1.3.5.5.4.2: Second sentence after "Chronic 1"
4.1.3.5.5.4.3: Second sentence after "Chronic 1"