

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

Tenth session, July 2005
Item 2 (b) of the provisional agenda

UPDATING OF THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Proposal for editorial clarifications in GHS chapter 3.4

Transmitted by the expert from Germany

In Notes 1, 3, and 5 to table 3.4.1 (GHS, Rev.1) there are redundant and partly contradictory statements with respect to labeling, also in comparison with the statements in Notes 2, 4, and 6 to the same table. In addition there is also no consistency with the respective Notes for other endpoints with options (see notes to tables 3.6.1, 3.7.1, 3.8.2 and 3.9.3).

In the decision logics 3.4.1 and 2 the cut-off/concentration limits triggering classification are not consistent with the criteria in table 3.4.1.

Proposal

Amendments to Notes 1, 3 and 5 to table 3.4.1

Amend the first sentence of Notes 1, 3 and 5 to table 3.4.1 as follows:

For Note 1: “If a skin sensitizer is present in the mixture as an ingredient at a concentration between 0.1% and 1.0%, ~~both an SDS and a label~~ would generally be expected.”

For Note 3: “If a solid or liquid respiratory sensitizer is present in the mixture as an ingredient at a concentration between 0.1% and 1.0%, ~~both an SDS and a label~~ would generally be expected.”

For Note 5: “If a gaseous respiratory sensitizer is present in the mixture as an ingredient at a concentration between 0.1% and 0.2%, ~~both an SDS and a label~~ would generally be expected.”.

Amendments to decision logic 3.4.1 and 3.4.2

In decision logic 3.4.1, amend the text in the last but one box on the left as follows:

Does the mixture contain one or more ingredients classified as a respiratory sensitizer at ^{4,5}:

- ≥ 0.1% w/w (solid/liquid),
- ≥ 1% w/w (solid/liquid),

or

- ≥ 0.1% v/v (gas), (see 3.4.3.3)
- ≥ 0.2% v/v (gas)? (see 3.4.3.3)

And add a new footnote “5” to read: “See 3.4.4.2”.

In decision logic 3.4.2, amend the text in the last but one box on the left as follows:

Does the mixture contain one or more ingredients classified as a skin sensitizer at ^{4,5}:

- ≥ 0.1% w/w (solid/liquid), or
- ≥ 1% v/v (gas)? (see 3.4.3.3)

And add a new footnote “5” to read: “See 3.4.4.2”.
