

**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

20 June 2014

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Geneva, 2 – 4 July 2014

Item 3 (g) of the provisional agenda

Classification criteria and hazard communication:

Miscellaneous

**Proposal for additional guidance in Chapter 3.2 Skin
Corrosion/Irritation**

**Transmitted by the International Paint and Printing Ink Council
(IPPIC)**

Introduction

1. IPPIC had previously submitted a proposal to clarify the issue concerning (older) skin corrosivity studies with only up to 3 minutes exposure and observation periods greater than 1 hour up to 14 days (see INF.19 (GHS 25th session), and ST/SG/AC.10/C.4/2013/8 - ST/SG/AC.10/C.3/2013/68). Substances which had been tested according to such schemes cannot easily be allocated to a sub-category according to Table 3.2.1.

Table 3.2.1: Skin corrosion category and sub-categories

	Criteria
Category 1	Destruction of skin tissue, namely, visible necrosis through the epidermis and into the dermis, in at least one tested animal after exposure \leq 4 h
Sub-category 1A	Corrosive responses in at least one animal following exposure \leq 3 min during an observation period \leq 1 h
Sub-category 1B	Corrosive responses in at least one animal following exposure $>$ 3 min and \leq 1 h and observations \leq 14 days
Sub-category 1C	Corrosive responses in at least one animal after exposures $>$ 1 h and \leq 4 h and observations \leq 14 days

2. At the 26th session of the Sub-Committee there was general agreement not to change the criteria in Table 3.2.1, but rather to deal with this issue through appropriate guidance. IPPIC was invited by the Sub-Committee to develop such guidance for consideration at a future session (ST/SG/AC.10/C.4/52, para. 13, 14). This document presents a first proposal for the new guidance, on which the comments of the Sub-Committee are invited.

Proposal

3. Add a new sub-section in 3.2.5 as follows:

“3.2.5.4 Guidance on use of test data

3.2.5.4.1 Classification criteria for allocation to skin corrosion sub-categories 1A, 1B and 1C are based on the duration of exposure and the duration of the subsequent observation periods (for details see 3.2.2.1.1.4 and table 3.2.1).

3.2.5.4.2 Classification in sub-category 1A is based on corrosive responses (see definition in 3.2.1.1) following ≤ 3 min exposure during an observation period ≤ 1 h, whereas classification in sub-category 1B is based on > 3 min and ≤ 1 h exposure during observations ≤ 14 days. However the criteria do not specify how to classify corrosive responses based on existing data from tests with ≤ 3 min exposure and an observation period > 1 h and ≤ 14 days.

3.2.5.4.3 Test results with corrosive responses following ≤ 3 min exposure, but only after observation > 1 h up to 14 days, should generally lead to sub-category 1B, since for sub-category 1A the upper observation period is definitely limited to a maximum of 1 h according to the established criteria. In cases with unclear results at 1 h, or where the observation had only been performed after 1h and thus skin corrosion at the 1 h observation limit for sub-category 1A cannot clearly be excluded, an allocation to sub-category 1A should be considered using expert judgement.”
