Secretariat

**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 Transport of Dangerous Goods	**Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals**
Fifty-seventh session	**Thirty-ninth session**
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Item 11 (b) of the provisional agenda	Item 3 (c) of the provisional agenda
Issues relating to the Globally Harmonized System of Classification and Labelling of Chemicals (GHS): clarification of 2.9.3.4.3.4 of the Model Regulations and 4.1.3.3.4 of the GHS	**Classification criteria and related hazard communication: Clarification of 2.9.3.4.3.4 of the Model Regulations and 4.1.3.3.4 of the GHS**

Clarification of 2.9.3.4.3.4 of Model Regulations and 4.1.3.3.4 of GHS

Transmitted by the expert from China*

Addendum

Introduction

1.   The expert from China submitted document ST/SG/AC.10/C.3/2020/33 to invite the Sub-Committee to reconsider the text for the classification of the long-term (chronic) aquatic environmental hazard of mixtures, i.e. Paragraph 2.9.3.4, in the "Model Regulations".

2.   In ST/SG/AC.10/C.3/2020/33, China proposed two amendment options. During the informal summer discussions, many valuable comments were received from experts of other countries and organizations, and a third option to amend paragraph 2.9.3.4.3.4 in the "Model Regulations" has been added.

3.   However, experts from China prefer Options 1 and 2, as such changes are more consistent with the relevant text in GHS. Considering that future amendments to GHS may potentially affect the UN Model Regulations, it will be much more convenient if the consistency between UN Model Regulations and GHS can be maintained.

Proposal

4.   In consideration of the different comments, the expert from China proposes a third option to amend paragraph 2.9.3.4.3.4 in the Model Regulations as follows (deleted text is ~~struck through~~; new text is underlined).

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5.   This additional option concerns only the Model Regulations and is submitted for consideration by the TDG Sub-Committee. The proposal concerning the GHS in document ST/SG/AC.10/C.4/2020/10 remains unchanged.

Option 3

"2.9.3.4.3.4   Classification for categories Chronic 1 and 2

(a)   ~~When there are adequate chronic toxicity data (EC$_x$ or NOEC) available for the mixture as a whole showing EC$_x$ or NOEC of the tested mixture ≤ 1mg/l:~~

    (i)   ~~classify the mixture as Chronic 1 or 2 in accordance with Table 2.9.1 (b) (ii) (rapidly degradable) if the available information allows the conclusion that all relevant ingredients of the mixture are rapidly degradable;~~

    (ii)   ~~classify the mixture as Chronic 1 or 2 in all other cases in accordance with Table 2.9.1 (b) (i) (non-rapidly degradable);~~

(b)   ~~When there are adequate chronic toxicity data (EC$_x$ or NOEC) available for the mixture as a whole showing EC$_x$(s) or NOEC(s) of the tested mixture > 1mg/l or above the water solubility:~~

    ~~No need to classify for long-term hazard under these Regulations.~~

(a)   If the available information allows the conclusion that all relevant ingredients of the tested mixture are rapidly degradable:

    (i)   when there are adequate chronic toxicity data (EC$_x$ or NOEC) available for the mixture as a whole showing EC$_x$ or NOEC of the tested mixture ≤ 0.1 mg/l:

        classify the mixture as Chronic 1 or 2 in accordance with Table 2.9.1 (b) (ii) (rapidly degradable);

    (ii)   when there are adequate chronic toxicity data (EC$_x$ or NOEC) available for the mixture as a whole showing EC$_x$ or NOEC of the tested mixture > 0.1 mg/l or above the water solubility: No need to classify the mixture for long-term hazard under these Regulations;

(b)   If the available information does not allow the conclusion that all relevant ingredients of the tested mixture are rapidly degradable:

    (i)   when there are adequate chronic toxicity data (EC$_x$ or NOEC) available for the mixture as a whole showing EC$_x$ or NOEC of the tested mixture ≤ 1 mg/l:

        classify the mixture as Chronic 1 or 2 in accordance with Table 2.9.1 (b) (i) (non-rapidly degradable);

    (ii)   when there are adequate chronic toxicity data (EC$_x$ or NOEC) available for the mixture as a whole showing EC$_x$ or NOEC of the tested mixture > 1 mg/l or above the water solubility: No need to classify the mixture for long-term hazard under these Regulations."

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