GLOBAL HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Chapter 1.3  Precedence for the allocation of symbols

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

Further to the informal document INF.8 tabled during the second session of 12th December 2001, EIGA wishes to formally submit a proposal for Chapter 1.3; paragraph 46 concerning the precedence for the allocation of symbols.

Proposal

Insert between 2nd and 3rd bullet point of paragraph 46 of Chapter 1.3; the following bullet point:

- "if both skull and crossbones and corrosive symbols apply, neither the dead fish and tree nor the exclamation mark need appear to indicate aquatic toxicity."

Justification

Gases can have either a systemic toxic effect, a corrosive (destruction of living tissue) effect or both. It is clear that since « corrosive » gases are water soluble (which lends them their corrosive properties) they are automatically aquatic toxics also. It seems to be unnecessary to add the dead fish and tree or exclamation mark for gases that are already labelled with skulls and bones and corrosivity symbols.