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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 Transport of Dangerous Goods (Twenty-third session, 30 June -4 July 2003 agenda item 6 (b))

LISTING, CLASSIFICATION AND PACKING

Comments on ST/SG/AC.10/C.3/2003/22 (United States of America)

Requirements for toxic by inhalation substances

<u>Transmitted by the International Technical Committee for the Prevention</u> and Extinction of Fire (CTIF)

CTIF welcomes the initiative taken by the Expert from the United States of America to improve the communication of the specific hazards posed by toxic by inhalation (TIH) substances.

As the expert of the United States of America expressed pictograms¹ are very important means of communication to emergency response personnel.

We can confirm that for toxic by inhalation (TIH) substances, given their ability to readily disperse through the atmosphere, it is particularly important that the responder is able to recognize the type of substance involved at a considerable distance from the sight of the incident. We therefore see an urgent need for additional hazard communication to allow responders to discern when they are confronted with an inhalation toxicity hazard as compared to an oral or dermal toxicity hazard.

We support the consideration of the expert from the United States of America that a label and placard distinct from the existing Division 6.1 label is necessary to effectively communicate the risk of TIH substances to emergency response personnel.

Because the proposed labels are clearly distinct from the label used for other toxic substances we are sure that trained responders will readily appreciate this very important information at first sight.

Although the Division 2.3 and Division 6.1 TIH substances pose the same type of inhalation hazard risk the physical state of the substance is another important piece of information which could easily be conveyed.

We ask the SCETDG to consider the following suggestions for labelling.

Division 6.1



Division 2.3



¹ GHS terminology