

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

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

Comments on ST/SG/AC.10/C.4/2004/9 (OECD)

Transmitted by the European Chemical Industry Council (CEFIC)

Background

OECD has submitted a proposal for the revision of Chapter 3.8 of the GHS to include newly developed criteria.

Comments

CEFIC considers that the OECD proposal is inconsistent with the structure of Part 3 of the GHS document.

In all the chapters in Part 3 of the GHS document, there is a clearly defined structure wherein each section in each chapter is defined as follows;

- 3.X.1 Definitions [and general considerations]
- 3.X.2 Classification criteria for substances
- 3.X.3 Classification criteria for mixtures
- 3.X.4 Hazard communication
- 3.X.5 Decision logic

where “X” represents the number of each chapter.

In paper ST/SG/AC.10/C.4/2004/9, OECD has proposed a new paragraph 3.8.1.7 as follows;

“3.8.1.7 The classification criteria in this chapter are organized as criteria for substances Categories 1 and 2 (3.8.2), criteria for substances Category 3 (3.8.3) and criteria for mixtures (3.8.4). See Figure 3.8.1.”

This and the subsequent parts of the proposal are inconsistent with the structure of every other chapter of Part 3, and CEFIC requests that OECD be asked to revise their proposal to maintain the integrity of the existing clearly defined structure for Part 3.
