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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 Globally
Harmonized System of Classification
and Labelling of Chemicals

Eighteenth session,
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Item 4 (a) of the provisional agenda

IMPLEMENTATION ISSUES

Consistency of terminology

Transmitted by the expert from Australia

1. The following implementation issues have been identified by the International Paint and Printing Ink Council (IPPIC) for consideration by the Implementation Working Group at the 18th session of the Sub-Committee:

Chapter 3.1: Acute toxicity

2. Paragraph 3.1.1: The definition has its focus on animal studies (“...administration of a single dose...given within 24 h...”) thus omitting human evidence; cf. respective text in Chapter 3.8 where exposure is mentioned in a general way. The definitions in all hazard classes could be looked at for consistency.

3. Paragraph 3.1.3.6.2.2: It is proposed to be precise in the statement the type of unknown toxicity by using “acute oral*/dermal*/inhalation*” before toxicity. The current version is too broad and might be misunderstood or used in a non-harmonized manner. Cf. the respective statement for the aquatic hazard in paragraph 4.1.3.6.1, “...unknown hazards to the **aquatic environment**. ;~~s—also the mentioned information tool SDS.~~”

4. The requirement for the additional statement is given in the context to classification, which is generally communicated in the SDS Section 2. In paragraph 3.1.5.2, decision logic 3.1.2, footnote 3, the label is mentioned.

Chapter 4.1: Hazardous to the Aquatic Environment:

5. Paragraph 4.1.3.6: Additional statement in case of data gaps: The requirement for the additional statement is given in paragraph 4.1.3.6. in the context of classification, which is communicated in the SDS Section 2. In the decision logic, footnote 3 on page 234 the label is mentioned.

6. Is the heading in 4.1.3.6 “.....**without any useable information**” appropriate, when in the paragraph it is said “...no useable information is available for one or more relevant ingredients...” ? cf. also footnote 3 on page 234. (GHS Rev.3, English version)

Aquatic toxicity, Annex 9

7. There is an inconsistency in using the terms hazard classes, sub-classes for aquatic toxicity. “Distinction can be made between the acute hazard and the chronic hazard and therefore hazard classes are defined for both properties representing a gradation in the level of hazard identified. Acute and long-term hazard represent two distinct sub-classes of the aquatic hazard, they are not comparable in their relative severity. Both hazard sub-classes should be applied independently for the classification of the substance. (GHS A9.2.3.1). “The principal hazard classes defined by the criteria relate largely to the potential for chronic hazard...” (GHS A9.2.3.2)
