



**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****Twenty-third session**

Geneva, 4–6 July 2012

Item 4 (a) of the provisional agenda

Implementation of the GHS: implementation issues**Proposals to address issues from the programme of work for
the practical classification issues correspondence group****Transmitted by the expert from the United States of America on behalf
of the informal correspondence group on practical classification issues¹****Purpose**

1. By way of this document, the informal correspondence working group on practical classification issues (PCI) is providing recommendations to clarify classification criteria in the GHS.

Background

2. During the twenty-second session, the PCI Group submitted information document INF.16 to the Sub-Committee, providing an update on the work undertaken by the group, as well as meeting in plenary to discuss several thought starters. Based on feedback on the information document and the thought starters, the PCI developed two consensus proposals to address agenda item (d) terminology issues from the PCI program of work (refer to information document INF.13 from the twenty-first session). Specifically, agenda item (d) includes:

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/38, para. 16 and ST/SG/AC.10/C.4/40, Annex II, item 3).

- “(i) Review the GHS text for inconsistencies in the use of the terms “toxicity category” and “hazard category”
- (ii) provide clarification in the GHS text that the terms “cut-off values” and “concentration limits” are intended to be used interchangeably”.

Proposal

3. The correspondence group invites the Sub-Committee to approve the editorial amendments to the GHS proposed below and to include them into its next revised edition.

PCI correspondence group item:

- (a) **Review the GHS text for inconsistencies in the use of the terminology “toxicity category” and “hazard category”**

Proposed recommendation: Replace “toxicity category” with “hazard category”, where appropriate.

The amendment does not apply to paragraphs 3.1.4.2 and footnote 1 to 3.1.2.5 (Chapter 3.1); A4.3.2.1.2 (Annex 4); and the table in A8.1 (Annex 8), since the term “toxicity” is referring to “acute oral toxicity”, “acute dermal toxicity”, or “acute inhalation toxicity.”

Proposed amendments to the GHS

- (a) In the paragraphs listed below, for “toxicity category” and “toxicity categories” read “hazard category” and “hazard categories”, respectively.
 - Chapter 3.1: 3.1.2.1; 3.1.2.4; 3.1.2.6.4; 3.1.3.5.5 (3 times);
 - Chapter 3.2: 3.2.3.2.5 (twice)
 - Chapter 3.3: 3.3.3.2.5 (twice)
 - Chapter 3.8: 3.8.3.3.5 (3 times)
 - Chapter 3.9: 3.9.3.3.5 (3 times)
 - Chapter 3.10: 3.10.3.2.5 (3 times)
 - Chapter 4.1: 4.1.3.4.5 (3 times); 4.1.5.1.1 (decision logic 4.1.1): sub-paragraph (a) in the text box preceding classification as Acute Category 1 (page 234 of the English version of the GHS)
- (b) To provide clarification to paragraphs 3.1.3.6.1 (a) and 3.1.4.1, replace “acute toxicity categories” with “acute toxicity hazard categories”.

- (b) **Provide clarification in the GHS text that the terms “cut-off values” and “concentration limits” are intended to be used interchangeably**

Proposed recommendation: In Chapter 1.3, paragraph 1.3.3.2.1 insert a reference to footnote “1” at the end of the first sentence as follows “.....in the GHS¹.” and add the following related footnote:

“¹ For the purposes of the GHS, the terms “cut-off value” and “concentration limit” are equivalent and are meant to be used interchangeably. Competent authorities may choose whether to use either term to define thresholds that trigger classification.”