Report from the correspondence group on hazard communication in the supply/use sector for substances and mixtures “Corrosive to metals”

Transmitted by the International Association for Soaps, Detergents and Maintenance Products (AISE) on behalf of the informal correspondence group

1. During its meeting on 11 December 2012, the correspondence group considered the feedback from the TDG Sub-Committee and reviewed the quantitative data detailed in paragraphs 5 to 12 in Working Document 2012/15.

2. Taking into account (i) potential downstream consequences of adopting any of the current possible options for a permanent solution (as identified in the annex to Working Document 2012/15) and (ii) the diverging views on a preferred option, it was suggested that a way forward could be to stay with the current text in GHS 1.4.10.5.5 and gather additional information covering, for example, substances/mixtures impacted and consumer understanding of the labelling for corrosive to metals.

3. The information on consumer understanding of the labelling may be derived from two potential scenarios based on whether a competent authority decides (or not) to adopt the current option in GHS 1.4.10.5.5.

4. The group considered the suggested way forward and agreed it was premature to decide on a permanent solution at this time pending further information on substances/mixtures impacted and consumer understanding becoming available.

5. The group noted that the European Union will adopt the competent authority option in GHS 1.4.10.5.5 via the proposed 4th Adaptation to Technical Progress (ATP) to the CLP Regulation (EC) No. 1272/2008.

6. The correspondence group agreed the following proposed way forward for consideration by the Sub-Committee:

(i) The correspondence group’s work on this topic should be stopped with immediate effect;

(ii) Based on current data/information, stay with the current competent authority option in GHS 1.4.10.5.5 and build experience on consumer understanding of the labelling;

(iii) Situation to be reviewed as appropriate when/if new information on consumer understanding/experiences with the labelling is available;
(iv) Countries are encouraged to provide feedback as to their experiences with consumer understanding based on whether or not they adopt the option in GHS 1.4.10.5.5.