

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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Item 7 of the provisional agenda

Programme of work for the biennium 2013–2014

Proposal for the ongoing work of the informal correspondence group on practical classification issues

**Transmitted by the expert from the United States of America on behalf
of the informal correspondence group**

Purpose

1. The purpose of this paper is to present a proposal for the ongoing work of the informal correspondence group on practical classification issues.

Background

2. The agreed scope of work for this informal correspondence group is to clarify the application of the GHS classification criteria for substances and mixtures through, for example, the development of proposals to modify the GHS text, the development of examples illustrating application of GHS criteria, and addressing any related hazard communication issues.

Proposal for ongoing work

3. A meeting of the informal correspondence group was held surrounding the 24th Session of the UNSCEGHS on Wednesday 12 December. Based on discussions during that meeting, the following work items below are proposed by the correspondence group for the next biennium:

- (a) Review the definitions in each of the health hazard chapters for consistency in the way the definitions are provided. For example, some definitions are taken directly from OECD test guidelines while others are more general (i.e., they don't refer to specific tests).
- (b) Review Chapter 3.8, Specific Target Organ Toxicity-Single Exposure and determine if the concept of "relevant ingredient" is needed in this chapter. The additivity principle was introduced in Section 3.8.3.4.5, but a "relevant ingredient" for this procedure has not been established.

- (c) Make correction to the heading in Table 3.7.1 from “Ingredients classified as” to “Ingredient classified as”. The current text is confusing and may suggest that the additivity principle applies.
- (d) Provide clarification regarding the untested mixture criteria for Aspiration Hazards. Specifically, clarify that the approach is additive, and also update the criteria to include the concept of “Relevant Ingredients” since this is an additivity approach.
- (e) Propose updated text in Sections 4.1.3.5.5.3 and 4.1.3.5.5.4 to reflect that the M-Factor must be taken into consideration when applying the Summation Method. Tables 4.1.3 and 4.1.4 appropriately illustrate this concept; however, the text describing the Summation Method criteria in Sections 4.1.3.5.5.3 and 4.1.3.5.5.4 do not currently include application of the M-Factor.
- (f) During the process of developing examples illustrating the application of the Interpolation within one hazard category, a question/potential new interpretation was raised. The PCI group will consider if the development of a new example is needed to illustrate how additivity of the “toxicologically active ingredients” could be considered when applying the bridging principle Interpolation within one hazard category.
- (g) Review various terms such as Unknown or Variable compositions, Complex reaction products and Biological materials (UVCBs), complex substance, and complex mixture to determine if GHS definitions are needed. If so, then also consider any consequential or conforming changes if necessary.
- (h) Propose updating Annex 4 of the GHS to include transport pictograms in Section 14 of the SDS to align with the requirements for GHS pictograms in Section 2. In addition, consider how the terms “generic” and “delineate” are used in A4.3.1.1 and make amendments to the text as appropriate.
- (i) Propose definitions, as appropriate, to clarify the use of terms such as “no data available”, “not applicable”, and “not classified”, which are used in the decision logics and SDS guidance in Annex 4.
- (j) Review the specific considerations for classification of aerosols and mist products for the aspiration hazard. In particular Section 3.10.1.6.5 of GHS, in order to align the criteria with the general principles for hazard classification and hazard communication, and make proposals for amending the text as appropriate.

Conclusion

4. The correspondence group proposes these items for the next biennium and welcomes discussion by the Sub-Committee regarding this work.
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