

**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 2 (g) of the provisional agenda

Classification criteria and hazard communication:

Miscellaneous

**Editorial clarification in Table 3.2.1 Skin corrosion category
and subcategories in Chapter 3.2 Skin corrosion/Irritation**

**Transmitted by the International Paint and Printing Ink Council
(IPPIC)**

Introduction

1. Table 3.2.1 is not consistent with the text in paragraph 3.2.2.4.2 concerning subcategory 1B. Paragraph 3.2.2.4.2 and Table 3.2.1 read as follows:

“ For those authorities wanting more than one designation for corrosivity, up to three sub-categories are provided within the corrosive category (Category 1, see Table 3.2.1): sub-category 1A, where responses are noted following up to 3 minutes exposure and up to 1 hour observation; sub-category 1B, where responses are described following exposure between 3 minutes and 1 hour and observations up to 14 days; and sub-category 1C, where responses occur after exposures between 1 hour and 4 hours and observations up to 14 days”.

Table 3.2.1: Skin corrosion category and sub-categories ^a

| Category 1: Corrosive | Corrosive sub-categories | Corrosive in ≥ 1 of 3 animals | |
|--|---------------------------------------|------------------------------------|----------------|
| (applies to authorities not using sub- categories) | (only applies to some authorities) | Exposure | Observation |
| corrosive | 1A | ≤ 3 min | ≤ 1 h |
| | 1B | > 3 min ≤ 1 h | ≤ 14 days |
| | 1C | > 1 h ≤ 4 h | ≤ 14 days |

2. In the text it is stated: “...subcategory 1B, where responses are described following exposure **between 3 minutes** and 1 hour and observation up to 14 days...”, thus the 3 min exposure is covered since the term “between 3 minutes” includes 3 min, whereas in the table only test results with studies > 3 min exposure are covered. Therefore there is a gap with respect to studies with 3 min exposure and observations > 1 hour.

3. Test guideline OECD 404 requires for all exposure schemes observation of the animal "...for **14 days** unless corrosion develops at an earlier time point". Thus the general procedure in testing laboratories is to continue with the observation period up to 14 days until corrosion is observed, if at 1h no necrosis have been developed; histopathology is considered/performed to evaluate questionable lesions.

Proposal

4. In order to make the text in paragraph 3.2.2.4.2 and the table 3.2.1 consistent and fill the gap in the table it is proposed to make an addition in the table for those test results based on exposures ≤ 3 min, but with observation time points > 1 h up to 14 days, as follows (amendments are shown in bold):

Table 3.2.1: Skin corrosion category and sub-categories ^a

| Category 1: Corrosive | Corrosive sub-categories | Corrosive in ≥ 1 of 3 animals | |
|---|------------------------------------|--|--|
| (applies to authorities not using sub-categories) | (only applies to some authorities) | Exposure | Observation |
| corrosive | 1A | ≤ 3 min | ≤ 1 h |
| | 1B | ≤ 3 min > 3 min ≤ 1 h | > 1 h ≤ 14 days ≤ 14 days |
| | 1C | > 1 h ≤ 4 h | ≤ 14 days |