

## 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

10 December 2019

### Thirty-eighth session

Geneva, 11-13 December 2019

Item 2 (d) of the provisional agenda

Classification criteria and related hazard communication

## Update on the work of the Practical Classification Issues Informal Correspondence Group

### Transmitted by the expert from the United States of America on behalf of the practical classification issues informal correspondence group

1. This informal document provides an update on the work undertaken by the Practical Classification Issues (PCI) informal correspondence group.
2. During the PCI working group meeting at the UNSCEHS 37<sup>th</sup> Session, the experts from the International Association for Soaps, Detergents and Maintenance Products (A.I.S.E.) and Croplife International presented a thought starter on issue (f) from the agreed program of work (UN/SCEGHS/36/INF.38/Rev.1) regarding the GHS cut off value/concentration limit for mixtures classification as serious eye damage.
3. The working group provided feedback on the thought starter indicating that additional studies would be beneficial in better determining whether there is a need to re-evaluate the 3% cut-off value in the additivity approach across all industries or if there is a concern just within the pesticide and cleaning industries, as evidenced in the studies outlined in the thought starter.
4. Following the feedback received, the experts from AISE and Croplife International revised the thought starter expanding the number of mixtures by 15 in the referenced AISE data studies. These new mixtures did not have stand-alone conclusion data, but were included based on a weight-of-evidence evaluation using a combination of *in-vitro* and *in-vivo* studies on the same product. The paper was also updated to include reference to a CMP-Europe study with 1 mixture (i.e., an antifouling paint).
5. The PCI held a teleconference on November 20, 2019 to discuss the revised thought starter. Following the discussion, the expert from AISE communicated that AISE and CropLife have already initiated outreach to other trade associations for additional data and will provide an update on the work prior to the 39<sup>th</sup> Session.
6. The PCI working group will meet Wednesday 11 December 2019 from 11:00 to 11:45 in Room IV to further progress items on its agreed program of work. The meeting agenda is provided in the annex of this document.

## Annex

### Meeting Agenda

We will discuss the following items from our agreed program of work (see UN/SCEGHS/36/INF.38/Rev.1):

1. Issue (a)

Consider developing an example(s) to illustrate how to interpret both single exposure and repeated exposure data when interpreting the statements in Chapter 3.8 Specific Target Organ Toxicity Single Exposure (GHS paragraph 3.8.1.6) and Chapter 3.9 Specific Target Organ Toxicity –Repeated Exposure (GHS 3.9.1.6) that effects covered in other health hazard chapters are not included in Chapters 3.8 and 3.9.

2. Issue (d)

GHS paragraph 3.1.2.6.1 provides guidance on how to convert experimental inhalation toxicity values for tests using a 1 hour exposure to a 4 hour equivalent for gases, vapours, dusts and mists. However, there is no guidance for tests using other exposure times (e.g., studies with 3 or 6 hour exposure times). Consider providing guidance to paragraph 3.1.2.6.1 to address the conversion of inhalation toxicity values for tests using exposure times other than 1 hour.

3. Issue (e)

Taking into account the scope of applicability of additivity and its limitations, consider whether it should be possible to apply additivity in certain cases to other health hazards, for which additivity is currently not explicitly mentioned, and if so, how to clarify this in the GHS (see rationale in UN/SCEGHS/32/INF.35).

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