

## 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

2 December 2020

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Item 8 of the provisional agenda

Programme of work for the biennium 2021–2022

## 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.

### Proposal for ongoing work

2. The informal correspondence group proposes for the 2021-2022 biennium items (a) through (e), which are carryover issues from the current biennium, and items (f) and (g) which are new issues.

- (a) Consider the need for hazard communication associated with the hazards of flammable vapours created in the headspace (the unfilled space left above the contents in a sealed container) for solid and liquid substances or mixtures.
- (b) Consider the need for clarification of the existing criteria on bridging principles via editorial changes to the text and/ or the development of additional guidance/ example(s) illustrating the application of the bridging principles. This would include *inter alia* the definition of an ingredient in the context of bridging principles (i.e., can an “ingredient” be composed of several substances or can it be a mixture?), and explore if it is technically feasible to apply the concept of substance structure activity relationships within the context of bridging principles.
- (c) 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.
- (d) 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 informal document INF.35 submitted at the thirty-second session).

- (e) Review available scientific evidence on the use of 3% in the additivity approach for mixture classification as serious eye damage Category 1. The group can consider if a new cut-off value/concentration limit is appropriate and/or if additional guidance would be helpful when applying the additivity formula.
- (f) Develop and propose a scientifically sound procedure for the tiered approach for classification of mixtures in chapters 3.2 to 3.4 allowing use of the available data in the most appropriate possible way (see informal document INF.23 for proposed workstreams). A preliminary evaluation will be conducted:
  - (i) including an analysis of the present strategies for all health hazards and aiming at identifying when and how bridging principles are best to be considered in the classification process;
  - (ii) defining which requirements need to apply to data from similar mixtures to be useful for bridging purposes;
  - (iii) exploring by comparison with the relevant sections of Chapter 1.3, to which extent improvements of the classification process for mixtures in chapters 3.2 to 3.4 are compatible with the rules in Chapter 1.3. If deemed necessary, options for improvement will be identified and proposed.
- (g) Develop proposals, as appropriate, to address technical errors and/or editorial improvements referred by the Non-Animal Test Methods Informal Working Group.

## Conclusion

3. The PCI correspondence group proposes these items for the next biennium and invites the Sub-Committee to consider the recommended program of work.

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