## 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** 

1 July 2021

Fortieth session
Geneva, 5-7 July 2021
Item 4 (b) of the provisional agenda
Development of guidance on the application of GHS criteria:
Practical classification issues

## Status report 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 since the December 2020 Sub-Committee meetings.
- 2. The PCI held two conference calls to continue discussions on items from its program of work (informal document INF.31, 39<sup>th</sup> session). A brief description of the topics discussed are summarized below:
- 3. The March 22, 2021, conference call continued discussion of item (c). The criteria in Chapter 3.1 Acute Toxicity for inhalation toxicity are expressed based on a 4-hour exposure. The text in Chapter 3.1 provides a method to covert test data using a 1-hour exposure to a 4-hour equivalent so this data can be used for classification. The purpose of item (c) is to determine if guidance should be developed to address the conversion of inhalation toxicity values for test data with exposure times other than 1 hour. The group reached agreement on several key principles that will be used to draft the guidance, which the US agreed to draft on behalf of the PCI. The group plans to have a paper for submission to the Sub-committee's December 2021 meeting.
- 4. The April 14, 2021, conference call continued discussion of item (d). Currently, there are several health hazard chapters in the GHS that do not take into consideration the concept of additivity. The purpose of item (d) is to take into account the scope of applicability of additivity and its limitations and consider whether it should be possible to apply additivity in certain cases to health hazards, for which additivity is currently not explicitly mentioned, and if so, how to clarify this in the GHS. ECHA facilitated the discussion at this meeting and was specifically seeking input on questions raised in its Thought Starter on outstanding issues, not previously discussed by the group. Given that we have completed discussion of the Thought Starter, ECHA is now determining the best path forward to propose text for Chapter 1.3, as well as considering the need to separately develop additional guidance.

5. The group agreed to prioritize the finalization of items (c) and (d) to free up time to start work on item (f) proposed by Germany in Informal Document INF.23 (23<sup>rd</sup> session). The purpose of item (f) is to consider a scientifically sound procedure for the tiered approach for classification of mixtures in Chapter 3.2 to 3.4 allowing use of the available data in the most appropriate possible way. Given that decisions on item (f) might impact the existing updates being considered for Chapter 3.2 and 3.3 from the NATM WG in this biennium as well as the work on Chapter 3.4, the current focus of the NATM WG, the PCI is planning to shift focus to item (f) once items (c) and (d) are complete.