

## 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

5 December 2022

### Forty-third session

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Item 7 of the provisional agenda

Programme of work for the biennium 2023–2024

## Status report and 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 provide and update on the work undertaken by the practical classification issues (PCI) informal correspondence group since the July 2022 Sub-committee meeting and to present a proposal for the ongoing work of the working group for the 2023-2024 biennium.

### Status report

2. The PCI working group met virtually on September 8, 2022 to review thought starters on issues #2 and #7 that were referred to the PCI from the non-animal test informal working group. Upon reaching agreement, the chair was charged with developing a working document (see ST/SG/AC.10/C.4/2022/21).

3. The PCI also met on November 17, 2022, during which a presentation on the history of the GHS bridging principles was provided followed by further discussion on work item (f) (see INF.31, 39<sup>th</sup> session). The working group also discussed proposals for ongoing work for the 2023-2024 biennium.

### Proposal for ongoing work

4. The informal correspondence group proposes for the 2023-2024 biennium items (1) through (4), which are carryover issues from the current biennium, and items (5) and (6) which are new issues.

Item 1 Consider the need to include in GHS Annex 11 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.

Item 2 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.

- Item 3 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).
- Item 4 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.
- Item 5 Asphyxiation is a well-known hazard in the workplace and is not currently included in the GHS. Consider developing a global approach to addressing simple asphyxiants in Annex 11 of the GHS.
- Item 6 Taking into consideration that Annex 8 has not been updated since 2003, the PCI will review Annex 8 and discuss the best approach moving forward. The group should consider if examples are still relevant, or if Annex 8 can be deleted. If the group decides examples are still relevant then it will either update Annex 8 or prepare examples for inclusion on the GHS Sub-committee's "Guidance on the application of GHS criteria" website, following the previous approach used by the PCI for mixtures examples.

## Conclusion

- 5. The PCI informal 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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