

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 (c) of the provisional agenda

**Work on the Globally Harmonized System of Classification and
Labelling of Chemicals:**

Use of non-animal testing methods

Comments on document ST/SG/AC.10/C.4/2024/10

Note by the secretariat

1. The secretariat would like to raise the attention of the Sub-Committee to the following editorial matters when considering the proposal for revision of chapter 3.4 in document ST/SG/AC.10/C.4/2024/10.

Reference to categories and subcategories in chapter 3.4

2. Current text in sections 3.4.2, 3.4.3 and 3.4.4 (decision logics) of the GHS refers to category 1 and sub-categories 1A and 1B.

3. The proposal in document ST/SG/AC.10/C.4/2024/10, introduces an inconsistency in paragraph 3.4.5.3.1.2.11 (former 3.4.5.3.2.7) by replacing the existing reference to “sub-categories” by “categories” in three instances within that paragraph. On the contrary, the proposed new text for 3.4.5.3.2.5.1 in the same document refers to sub-categories, in accordance with the terminology currently being used in that chapter in the GHS.

4. The secretariat believes that the references to “category” 1A/1B in 3.4.5.3.1.2.11 may have been introduced inadvertently when drafting the proposal. Noting that this inconsistency appears in other chapters of the GHS, the Sub-Committee is invited to confirm:

- (a) whether “category 1A” and “category 1B” should be replaced in all instances by “sub-category 1A” and “sub-category 1B” in 3.4.5.3.1.2.11 (to ensure the same terminology is consistently used throughout chapter 3.4); or
- (b) whether, following the outcome of the discussion on this topic in informal document INF.6, all references to sub-category(ies) in the GHS should be replaced by category(ies).

Guidance on the use of human data for substances and mixtures

5. The proposed amendments to section 3.4.5.3.1 include a new paragraph 3.4.5.3.1.2.1 that reads:

“3.4.5.3.1.2.1 This guidance is relevant to substances and mixtures.”

6. In addition, for all subsequent subparagraphs under that section, all references to “substance” are amended to read “substance or mixture”.

7. The secretariat believes that with the replacement of “substance(s)” by “substance(s) or mixture(s)” on each paragraph under 3.4.5.3.1.2, the general statement in the proposed new paragraph 3.4.5.3.1.2.1 at the beginning of the section becomes redundant.

8. On these grounds, the secretariat proposes to delete paragraph 3.4.5.3.1.2.1 (“This guidance is relevant to substances and mixtures”). Subsequent paragraphs and cross-references will be renumbered accordingly, as appropriate.
