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**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****Twenty-second session**

Geneva, 7 – 9 December 2011

Item 2 (b) of the provisional agenda

Updating of the Globally Harmonized System of Classification  
and Labelling of Chemicals (GHS): Health hazards**Amendment to paragraphs 3.2.3.1.2 and 3.3.3.1****Transmitted by the expert from Germany on behalf of the informal  
correspondence group on the editorial revision of Chapters 3.2 and 3.3<sup>1</sup>****Proposal**

1. In 3.2.3.1.2 and 3.3.3.1, *replace*

“If consideration of alkali/acid reserve suggests the substance or mixture may not be corrosive despite the low or high pH value, then further testing needs to be carried out to confirm this, preferably by use of an appropriate validated *in vitro* test.”

*with*

“However, if consideration of acid/alkaline reserve suggests the substance or mixture may not be corrosive despite the low or high pH value, this needs to be confirmed by other data, preferably data from an appropriate validated *in vitro* test.”

**Justification**

2. The GHS does not make testing requirements for health hazards. The recommendations on testing strategy will be deleted in chapters 3.2 and 3.3. The proposed deletion is not dependent on putative future changes in GHS chapters 3.2 and 3.3 and can

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<sup>1</sup> In accordance with the report of the Sub-Committee of Experts on its twenty-first session (ST/SG/AC.10/C.4/42, paragraph 19).

be established independently. The proposal represents a change in the classification criteria and was submitted independently as it is not covered by the mandate of the correspondence group.

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