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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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

Revision

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 next biennium items (a) through (e), which are carryover issues from the current biennium, and item (f) which is a new issue.

- (a) Consider developing an example(s) to illustrate how to interpret both single exposure and repeated exposure data when interpreting the statements in Chapter 3.8 Specific Target Organ Toxicity – Single Exposure (GHS paragraph 3.8.1.6) and Chapter 3.9 Specific Target Organ Toxicity – Repeated Exposure (GHS paragraph 3.9.1.6) that effects covered in other health hazard chapters are not included in Chapters 3.8 and 3.9.
- (b) 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.
- (c) 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.

- (d) 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.
- (e) 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 UN/SCEGHS/32/INF.35).
- (f) Review available scientific evidence on the use of 3% cut-off value/concentration limit 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.

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.