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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

Eighth session, 6-9 December 2004
Item 2(d) of the provisional agenda

**UPDATING OF THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND
LABELLING OF CHEMICALS (GHS)**

Clarifying discrepancies between the GHS main text and its annexes

Transmitted by the expert from Japan

Introduction

In the course of the English-to-Japanese translation of the GHS main text and its annexes, some discrepancies between the main text and its annexes have been found. Japan believes that these discrepancies should be clarified.

Justification

In the GHS English text, there are some expressions that seem to be wrong or inconsistent when compared with related provisions/wording described/used in other parts of the text.

Proposal

In order to clarify these discrepancies, Japan proposes amendments to the GHS, which are contained in the Annex to this document.

Annex**Proposed amendment to the GHS**

NOTE : FIGURE(S) IN COLUMNS ENTITLED “LINE” SHOW NUMBER(S) OF LINE FROM TOP OF THE PARAGRAPH OTHERWISE SPECIFIED.

Proposal 1

Judging from the content of 3.10.2.12, chronic category 4 should be applied for substance if all of three following conditions are matched;

- Poorly soluble and no acute toxicity is observed up the water solubility,
- Lack of the potential to rapidly biodegrade
- Have the potential to bioaccumulate.

Therefore, following amendment is needed:

Line	Paragraph	Page	Original	Proposal
2	The 3 rd box on left	225	And/or	And

Annex 2

Line	Paragraph	Page	Original	Proposal
4 in 1 st column	Line 5 from top in para.1 in 2 nd column	288	And/or	And

Proposal 2

Terms of “class”, “category” and related words in main text and Annex 8 are not consistent with the definition of main text (Part 1).

Therefore, following amendment is needed.

Main Text □

Line	Paragraph	Page	Original	Proposal
2	Footnote	111	Class	category
3	The box on the left	121	Class	category
1	3.3.3.2.4	144	Class	category

Annex 8

Line	Paragraph	Page	Original	Proposal
9-10	A8.2.1	349	two different <u>classification categories</u> , one acute <u>category</u> , consisting of three <u>classes</u> and one chronic <u>category</u> , consisting of 4 <u>classes</u>	two different <u>classes</u> , one acute <u>class</u> , consisting of three <u>categories</u> and one chronic <u>class</u> , consisting of 4 <u>categories</u>
10-11	A8.2.1	349	The acute <u>classification category</u> makes provision for two acute hazard <u>classes</u> (<u>acute II</u> and III)	The acute <u>class</u> makes provision for two acute hazard <u>categories</u> (<u>Acute Category II</u> and III)
14	A8.2.1	349	consideration of all acute <u>classification classes</u> as well as the chronic <u>classification classes</u>	consideration of all acute <u>categories</u> as well as the chronic <u>categories</u>
16	A8.2.1	349	the hazard <u>classes</u>	the hazard <u>categories</u>
6	A8.2.3.1	349	Chronic II	Chronic <u>Category II</u>
7	A8.2.3.1	349	Hazard <u>classed</u>	hazard <u>classes</u>
1	A8.2.3.2	349	Hazard <u>bands</u>	hazard <u>categories</u>
10	A8.2.3.2	349	Hazard <u>band</u>	hazard <u>category</u>
5	A8.2.3.5	350	<u>Class IV</u>	<u>Category IV</u>
7	A8.2.3.6	350	Hazard <u>band</u>	hazard <u>category</u>
11	A8.2.4.3	351	Assigned to a chronic hazard <u>band</u> , only the acute hazard <u>bands</u> need be applied	assigned to a chronic hazard <u>category</u> , only the acute hazard <u>categories</u> need be applied
3	A8.2.4.4	351	<u>chronic class IV</u>	<u>Chronic Category IV</u>
4	A8.2.4.4	351	<u>chronic class IV</u>	<u>Chronic Category IV</u>
Last	A8.2.5	351	Hazard <u>band</u>	hazard <u>category</u>
6	A8.3.2.5.1	354	<u>classification band</u>	<u>Category</u>
3	A8.3.3.1.2	355	<u>Chronic</u> and/or <u>acute</u> band I	<u>Chronic</u> and/or <u>Acute Category I</u>
4	A8.3.3.1.2	355	this <u>band</u>	this <u>category</u>
5	A8.3.3.1.2	355	<u>Class II</u>	<u>Category II</u>
6	A8.3.3.1.2	355	<u>Class III</u>	<u>Category III</u>
13	A8.3.3.2.2	356	<u>chronic class IV</u>	<u>Chronic Category IV</u>
3	A8.3.5.4	358	Acute <u>Class I</u>	Acute <u>Category I</u>
3	A8.3.5.4	358	Chronic I	Chronic <u>Category I</u>
10	A8.3.5.7.2	359	Chronic I and/or Acute I <u>classes</u>	Chronic <u>Category I</u> and/or Acute <u>Category I</u>
17	A8.3.5.7.2	359	Chronic IV <u>class</u>	Chronic <u>Category IV</u>
1	Footnote	367	chronic <u>class IV</u>	Chronic <u>Category IV</u>
3	A8.7.1.4	387	Hazard <u>band</u>	hazard <u>class</u>
6	A8.7.5.1.1	391	<u>classification band</u>	<u>class</u>
2	A8.7.5.2.3	391	Chronic IV	Chronic <u>Category</u>
5	A8.7.5.2.4.1	392	Acute <u>Class I</u>	Acute <u>Category</u>
5	A8.7.5.2.4.1	392	Chronic <u>Class I</u>	Chronic <u>Category I</u>

Line	Paragraph	Page	Original	Proposal
8	A8.7.5.2.4.1	392	Acute <u>Class II</u>	Acute <u>Category II</u> .
8	A8.7.5.2.4.1	392	Chronic <u>Class II</u>	Chronic <u>Category II</u>
11	A8.7.5.2.4.1	392	Acute <u>Class III</u>	Acute <u>Category III</u> .
11	A8.7.5.2.4.1	392	Chronic <u>Class III</u>	Chronic <u>Category III</u>
2	A8.7.5.2.4.2	392	Chronic I	Chronic <u>Category I</u>
5	A8.7.5.2.4.2	392	Chronic II	Chronic <u>Category II</u>
4	A8.7.5.3.2.2	392	Acute <u>Class I</u>	Acute <u>Category I</u>
4	A8.7.5.3.2.2	392	Chronic I	Chronic <u>Category I</u>
7	A8.7.5.3.2.2	392	Acute <u>Class II</u>	Acute <u>Category II</u>
7	A8.7.5.3.2.2	392	Chronic II	Chronic <u>Category II</u>
10	A8.7.5.3.2.2	392	Acute Class III	Acute <u>Category III</u>
1	A8.7.5.3. 3	392	Chronic IV	Chronic <u>Category IV</u>
5	A8.7.5.3.3.1	393	Chronic IV	Chronic <u>Category IV</u>
8	A8.7.5.3.3.2	393	Acute <u>Class I</u>	Acute <u>Category I</u>
8	A8.7.5.3.3.2	393	Chronic <u>Class I</u>	Chronic <u>Category I</u>
11	A8.7.5.3.3.2	393	Acute <u>Class II</u>	Acute <u>Category II</u>
11	A8.7.5.3.3.2	393	Chronic <u>Class II</u>	Chronic <u>Category II</u>
15	A8.7.5.3.3.2	393	Acute <u>Class III</u>	Acute <u>Category III</u>
15	A8.7.5.3.3.2	393	Chronic <u>Class III</u>	Chronic <u>Category III</u>
2	A8.7.5.3.3.3	393	Chronic I	Chronic <u>Category I</u>
7	A8.7.5.3.3.3	393	Chronic II	Chronic <u>Category II</u>

Proposal 3

The name of hazard class should be consistent between PART 3 and ANNEX 2.

Therefore, following amendment is needed.

Annex 2 □

Line	Paragraph	Page	Original	Proposal
1	A2.22	278	Mutagenicity	Germ cell mutagenicity

Proposal 4

The criteria in Annex 2 should be consistent with those in the main text.

Therefore, following amendment is needed.

Annex 2

Line	Paragraph	Page	Original	Proposal
2 in 1 st column	Line 2 from top in 2 nd column	260	Substances	Substances and mixtures

Proposal 5

Some hazard statements provided in Annexes 1 and 2 are not expressed in the same way than in the GHS main text and this may cause confusion. Discrepancies in the wording of Hazard Statements between

Part 3, Annex 1 and Annex 2 are shown in page 6 of this document. Therefore, following amendments are needed.

Line	Paragraph	Page	Original	Proposal
1 in 1 st column	Hazard statement in 3 rd column	280	May damage fertility or the unborn child (state specific effect if known) (<u>state</u> route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	May damage fertility or the unborn child (state specific effect if known) <u>or</u> (route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)
2 in 1 st column	Hazard statement in 3 rd column	280	May damage fertility or the unborn child (state specific effect if known) (<u>state</u> route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	May damage fertility or the unborn child (state specific effect if known) <u>or</u> (route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)
1 in 1 st column	Hazard statement in 3 rd column	282	Causes damage to (state all organs affected, <u>or use a general statement where there is no definite evidence that other organs are not affected</u>) if (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard	Causes damage to <u>organs</u> (<u>or</u> state all organs affected, <u>if known</u>) if (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)
2 in 1 st column	Hazard statement in 3 rd column	282	Causes damage to organs (state all organs affected, if known) <u>through shingle exposure</u> (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	Causes damage to organs (<u>or</u> state all organs affected, if known) <u>if</u> (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)
1 in 1 st column	Hazard statement in 3 rd column	283	Causes (<u>state all organs affected, or use a general statement where there is no definite evidence that other organs are not affected</u>) <u>damage</u> through prolonged or repeated exposure (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	Causes <u>damage to organs</u> (<u>state all organs affected, if known</u>) through prolonged or repeated exposure (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)

Proposal 6

In "Outcome" in Module 6 in Annex 5, the following sentences are not understandable. Therefore following amendment is needed.

Line	Paragraph	Page	Original	Proposal
Module 6 in 1 st column in Table A5.1	Line 4-6 from top in 4 th column	312	-recall of symbol as proxy for attention to <u>symbol</u> -recall of hazard statement as proxy for attention to <u>hazard statement</u> .	-recall of symbol as proxy for attention to <u>statements</u> -recall of hazard statement as proxy for attention to <u>symbol</u> .

Table showing the discrepancies between the wording of Hazard Statements of PART 3 and Annexes 1 and 2 of the current GHS text

	TOXIC TO REPRODUCTION	TARGET ORGAN SYSTEMIC TOXICITY (SINGLE EXPOSURE)	TARGET ORGAN SYSTEMIC TOXICITY (REPEATED EXPOSURE)
	Category 1A	Category 1	Category 1
Part 3	May damage fertility or the unborn child (state specific effect if known) or (route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	Causes damage to organs (or state all organs affected, if known) if (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	Causes damage to organs (state all organs affected, if known) through prolonged or repeated exposure (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)
ANNEX 1	May damage fertility or the unborn child (state specific effect if known) (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	Causes damage to (state all organs affected, or use a general statement where there is no definite evidence that other organs are not affected) if (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard	Causes (state all organs affected, or use a general statement where there is no definite evidence that other organs are not affected) damage through prolonged or repeated exposure (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)
ANNEX2	May damage fertility or the unborn child (state specific effect if known) (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	Causes damage to organs (state all organs affected, if known) through shingle exposure (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	Causes damage to organs (state all organs affected, if known) through prolonged or repeated exposure (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)