

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 4 (a) of the provisional agenda

Implementation of the GHS –Implementation issues

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 present a proposal for the ongoing work of the informal correspondence group on practical classification issues.

Background

2. The agreed scope of work for this informal correspondence group is to clarify the application of the GHS classification criteria for substances and mixtures through, for example, the development of proposals to modify the GHS text, the development of examples illustrating application of GHS criteria, and addressing any related hazard communication issues.

Proposal for ongoing work

3. The following work items below are proposed by the correspondence group for this current biennium. These work items were drawn from a variety of sources, including discussions in working group meetings, thorough e-mail correspondence, and from the paper submitted by the implementation issues correspondence group in the seventeenth session (ST/SG/AC.10/C.4/2008/22).

- (a) Develop an approach for the incorporation of the IMO SDS data elements for MARPOL Annex I cargoes and marine fuel oils into the GHS SDS requirements.
- (b) Provide clarity for the conditions necessary for the use of bridging principles using in-vitro data through the provision of agreed examples.
- (c) Provide clarity on the implication of the assumption in Note 4 of Table 4.1.1 that “when no useful data on degradability are available...the substance should be regarded as not rapidly degradable”.

- (d) Terminology issues:
 - (i) Review GHS text for inconsistencies in the use of the terms “toxicity category” and “hazard category”.
 - (ii) Provide clarification in the GHS text that the terms “cut-off values” and “concentration limits” are intended to be used interchangeably.
- (e) Provide an example of the application of the classification criteria for the aquatic toxicity of mixtures when both toxicity data and classification information are available for ingredients.
- (f) Review the definitions in each of the health hazard chapters for consistency in the way the definitions are provided. For example, some definitions are taken directly from OECD test guidelines while others are more general (i.e., they don’t refer to specific tests).
- (g) Propose editorial revisions and/or definitions, as appropriate, to clarify the use of terms such as “no data available”, “not applicable”, and “not classified”, which are used in the decision logics and SDS guidance in Annex 4.

Conclusion

4. The correspondence group proposes these items for the current biennium and welcomes discussion by the Sub-Committee regarding this work.
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