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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-first session**  
Geneva, 27 – 29 June 2011

**Draft report (cont'd)**

**III. Updating of the Globally Harmonized System of  
Classification and Labelling of Chemicals (GHS) (agenda  
item 2) (*cont'd*)**

**B. Health hazards**

**Skin corrosion/irritation and serious eye damage: Guidance on evaluation of data  
from studies with more than three animals**

*Document:* ST/SG/AC.10/C.4/2011/2 (Germany)

16. In view of the comments made by some experts on the proposal in paragraphs 3 and 4, the Sub-Committee requested the expert from Germany to bring them to the attention of the correspondence group and to come back with a revised text before the end of the session.

**C. Environmental hazards**

**Alignment of Annex 9 (section A9.7) and Annex 10 with the criteria in Chapter 4.1**

*Informal document:* INF.4 (ICMM)

17. The Sub-Committee took note of the request for nominations for the informal correspondence group led by ICMM and noted that ICMM intended to organize a written technical discussion round starting on 1 September 2011.

## **E. Miscellaneous proposals**

### **1. Correction to paragraph 1.3.2.4.6 of the GHS**

*Document:* ST/SG/AC.10/C.4/2011/1 (Germany)

18. The correction to paragraph 1.3.2.4.6 proposed by Germany was adopted with some additional amendments (see annex).

19. Some experts proposed further corrections to the last sentence of the paragraph but the Sub-Committee considered that more time was needed to consider their implications and requested the secretariat to prepare a formal document for the next session.

### **2. Assessment of alloys and other inorganic matrix-type substances**

*Informal document:* INF.5 (ICMM)

20. Some experts questioned the need to develop specific guidance for alloys arguing that the GHS does not include currently any guidance for any other type of mixtures. Others did not see where the boundaries between hazard and risk assessment approaches would be and requested that this be taken into account during the discussions.

21. The representative from ICMM explained that alloys do not behave as simple mixtures given that the release of metal ions differs from one alloy to another depending on its composition and therefore its classification cannot be derived from that of its constituents, as it is the case for other mixtures. He suggested that the work could start with the assessment of hazards for environmental endpoints, for which guidance have been developed based on already validated protocols, leaving health hazards for a later stage.

22. The Sub-Committee considered however that more information about the exact scope of the work was needed before a decision could be made.

## **IV. Hazard communication issues (agenda item 3)**

### **A. Fire extinguishers**

*Informal document:* INF.3 (Argentina)

23. Several experts were of the view that fire extinguishers were already covered under Chapter 2.5 of the GHS (Gases under pressure) and therefore they did not see the need for additional labelling provisions. They also noted that fire extinguishers were transported under a specific UN number (UN1044) and that they were currently exempted from inland transport regulations (at least in Europe) under certain conditions. It was also noted that the requirement for additional labelling was not justified from a safety point of view since no problems were reported with the current situation.

24. Others on the contrary thought that the proposal needed to be considered further and that it could be useful to have some information on the recipient itself indicating for example that it should not be stored under high temperatures.

25. The Sub-Committee invited the expert from Argentina to consider developing his proposal further taking into account the comments received.