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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
(Fourth session, 9-11 December 2002
agenda item 2)

AMENDMENT PROPOSAL TO THE GLOBALLY HARMONISED SYSTEM OF
CLASSIFICATION AND LABELLING
OF CHEMICALS (GHS)

Transmitted by the Organisation for Economic Co-Operation and Development (OECD)

Revision of Notes to Table 3.4.1 of Chapter 3.4:
Respiratory or Skin Sensitisation

Introduction

In July 2002 the third Session of the Sub-Committee of Experts on the Globally Harmonised System of Classification and Labelling of Chemicals adopted the proposal to replace table 3.4.1 of Chapter 3.4 (respiratory and skin sensitisers) and the notes to the table as proposed in ST/SG/AC.10/C.4/2002/12 and INF.6. The additional sentence proposed in INF.7 was also inserted in the respective Notes to the table but was placed between square brackets subject to consideration and resolution by OECD [see ST/SG/AC.10/C.4/2002/CRP.1/Add1].

Proposal

Since July 2002 efforts have been made by the OECD *ad hoc* Expert Group on Sensitisation to solve the delicate issue of the "additional sentence" to the Notes of table 3.4.1. On 24th September the *ad hoc* Expert Group reached consensus on the additional sentence. On 25th September the proposal for the additional sentence was simultaneously submitted to the OECD Task Force of the Programme on Harmonisation of Classification and Labelling (TF-HCL) and the Heads of Delegation of the Joint Meeting of the Chemicals Committee and the Working Party on Chemicals, Pesticides and Biotechnology (Joint Meeting) for their consideration, approval and endorsement. Member countries were requested to respond before 30th October and no objections were raised by that date. Consequently, the proposal for the additional sentence to the Notes to table 3.4.1 of Chapter 3.4 of the GHS was formally adopted by OECD Member countries on 31st October 2002.

It is proposed that the sentence, adopted by OECD Member countries, be inserted in the appropriate Notes to table 3.4.1 of Chapter 3.4 of the GHS as indicated.

PROPOSAL FOR REVISION OF NOTES TO TABLE 3.4.1

Table 3.4.1: Cut-off values/concentration limits of ingredients of a mixture classified as either skin sensitizers or respiratory sensitizers, that would trigger classification of the mixture

| Ingredient Classified as: | Cut-off/concentration limits triggering classification of a mixture as: | | |
|---------------------------|---|------------------------|-----------------|
| | Skin Sensitizer | Respiratory Sensitizer | |
| | All physical states | Solid/Liquid | Gas |
| Skin Sensitizer | = 0.1% (Note 1) | - | - |
| | = 1.0% (Note 2) | - | - |
| Respiratory Sensitizer | - | = 0.1% (Note 3) | = 0.1% (Note 5) |
| | - | = 1.0 % (Note 4) | = 0.2% (Note 6) |

Note 1: If a skin sensitizer is present in the mixture as an ingredient at a concentration between 0.1% and 1.0%, both an SDS and a label would generally be expected. **In addition, some competent authorities may require supplemental labelling for mixtures containing a sensitising ingredient at concentrations above 0.1%.** The label warning for skin sensitizers between 0.1% and 1.0% may differ from the label warning for skin sensitizers $\geq 1.0\%$, depending on competent authority requirements. While the current cut-off values reflect existing systems, all recognise that special cases may require information to be conveyed below that level.

Note 2: If a skin sensitizer is present in the mixture as an ingredient at a concentration of $\geq 1.0\%$, both an SDS and a label would generally be expected.

Note 3: If a solid or liquid respiratory sensitizer is present in the mixture as an ingredient at a concentration between 0.1% and 1.0%, both an SDS and a label would generally be expected. **In addition, some competent authorities may require supplemental labelling for mixtures containing a sensitising ingredient at concentrations above 0.1%.**The label warning for solid or liquid respiratory sensitizers between 0.1% and 1.0% may differ from the label warning for solid or liquid respiratory sensitizers $\geq 1.0\%$, depending on competent authority requirements. While the current cut-off values reflect existing systems, all recognise that special cases may require information to be conveyed below that level.

Note 4: If a solid or liquid respiratory sensitizer is present in the mixture as an ingredient at a concentration of $\geq 1.0\%$, both an SDS and a label would generally be expected.

Note 5: If a gaseous respiratory sensitizer is present in the mixture as an ingredient at a concentration between 0.1% and 0.2%, both an SDS and a label would generally be expected. **In addition, some competent authorities may require supplemental labelling for mixtures containing a sensitising ingredient at concentrations above 0.1%.** The label warning for a gaseous respiratory sensitizers between 0.1% and 0.2% may differ from the label warning for a gaseous respiratory sensitizers $\geq 0.2\%$, depending on competent authority requirements. While the current cut-off values reflect existing systems, all recognise that special cases may require information to be conveyed below that level.

Note 6: If a solid or liquid respiratory sensitizer is present in the mixture as an ingredient at a concentration of $\geq 0.2\%$, both an SDS and a label would generally be expected.
