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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

Ninth session, 11-13 July 2005 Item 2 (b)(vi) of the provisional agenda

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

Miscellaneous

Proposal for the usage of a precautionary statement for acute intoxication by inhalation of specific corrosive substances

Transmitted by the expert from Germany

Introduction

A hazard of acute intoxication by inhalation exists for corrosive substances in case of relevant exposure by inhalation.

Currently, in the European Union (EU), corrosive substances need not to be tested with respect to their acute inhalation toxicity because a strong local response in the respiratory tract is expected. For reasons of animal welfare such studies are not recommended. However, sometimes acute inhalation studies are available for corrosive substances which is reflected by parallel classification of skin corrosivity and acute inhalation toxicity in the EU. From the latter it can be concluded that corrosive substances may be acutely toxic after inhalation to a varying degree, which is only occasionally proved by testing.

Justification

A hazard of acute intoxication by inhalation is likely to be existing for specific corrosive substances but neither tested nor communicated. A modification of the respective GHS precautionary statement is proposed for those corrosive substances, where a relevant inhalative exposure can be derived from a substantial vapour pressure.

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A reasonable cut-off value which is considered as substantial vapour pressure in the context of the present proposal can be $>10^{-2}$ Pa at 20 °C.

Proposal

It is proposed to communicate this hazard via inhalation through a precautionary statement in GHS (see below, compare to the matrix for skin corrosion/irritation hazard in page 74 of the English version of document ST/SG/AC.10/32/Add.3 (new text is underlined):

Skin corrosion/irritation, for hazard category 1A to 1C:

Prevention

Wear protective gloves/clothing and eye/face protection as specified by the manufacturer/supplier or the competent authority.

Wash thoroughly after handling.

Do not breathe dust/fume/gas/mist/vapours/spray.

- if inhalable particles may occur during use or if the vapour pressure is above 10⁻² Pa.

In the course of the previous discussions on precautionary statements, it was reaffirmed that the text of Annex 3 of the GHS was to give guidance and not to standardize precautionary statement wording in a first step, and that Annex 3 would be frozen during a certain period to test its implementation and give feedback. Standardization might occur at a later stage when experience has been gained on this new Annex 3 after biennium 2005/2006.

Thus, this proposal may be considered in future discussions on the further development of precautionary statements.