



**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**

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Item 2 (e) of the provisional agenda

**Updating of the Globally Harmonized System of Classification
and Labelling of Chemicals (GHS) – Miscellaneous proposals****Correction to the GHS****Transmitted by the expert from Germany on behalf of the informal
correspondence group on the editorial revision of Chapters 3.2 and 3.3¹****Proposal**

In 1.3.2.4.6, in the fourth sentence delete “testing schemes starting with”, as follows:

“1.3.2.4.6 *Animal welfare*

The welfare of experimental animals is a concern. This ethical concern includes not only the alleviation of stress and suffering but also, in some countries, the use and consumption of test animals. Where possible and appropriate, tests and experiments that do not require the use of live animals are preferred to those using sentient live experimental animals. To that end, for certain hazards (skin irritation/corrosion and eye irritation/serious eye damage) ~~testing schemes starting with~~ non-animal observations/measurements are included as part of the classification system. For other hazards, such as acute toxicity, alternative animal tests, using fewer animals or causing less suffering are internationally accepted and should be preferred to the conventional LD₅₀ test.”

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.4/40, annex II and ST/SG/AC.10/38, para.16).

Justification

The GHS does not make testing requirements for health hazards. The recommendations on testing strategy will be deleted in GHS chapters 3.2 and 3.3. As a consequence, GHS 1.3.2.4.6 needs amendment as it also refers to testing strategy. The proposed deletion is not dependent on putative future changes in GHS chapters 3.2 and 3.3 and can be established independently.
