UN/SCEGHS/2/INF.7

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals
(Second session, 12-14 December 2001, agenda item 3)

GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Comments on IOMC paper – The GHS for Hazard Classification & Communication (draft 10th October 2001)

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

Further to the first and second INF papers, offering comments on the first two parts of the IOMC document, EIGA wishes to address some aspects of the chapters on Health & Environmental Hazards.

Chapter 3.1 – Acute Toxicity

For clarification purposes, gases concentration should read "ppmV" (parts per million by volume).

Table 3: Under Categories 1 & 2 for inhalation, the words "fatal if inhaled" is considered to be inappropriate, as it could lead to unnecessary alarm. Even the most toxic gases do not result in fatalities until significant quantities have been inhaled. EIGA therefore proposes the words "very toxic if inhaled" or "may be fatal if inhaled".

EIGA also questions whether it is significant to separate Categories 1 & 2 for gases as they have the same symbols, signal words & hazard statements. Contrary to solids or liquids, the concept of Packing Groups is unknown for gases.

Chapter 3.2 – Skin/eye corrosion

This chapter does not appear to cover the corrosivity aspect of gases. Although skin and eye corrosion is possible with corrosive gases such as ammonia or hydrogen fluoride, the principal hazard arising is from their inhalation, where the corrosive effects would be to the airways and lungs. The LC50 values for pure corrosive gases and cut-off values for preparations containing corrosive gases, as assigned in the European Substances and Preparations Directives currently reflect this hazard.

EIGA considers that quite some aspects of this complex problem need a thorough review in an appropriate working group and is offering to participate in the proceedings if deemed useful. As a starter, EIGA submits for consideration the following for corrosive gases and mixtures containing corrosive gases:

1. *For pure corrosive gases:* Retain the classification values for corrosiveness, as listed in the European Substances Directive, Annex 1.

2. *For preparations containing corrosive gases:* Retain the classification link between corrosive/irritant and toxic/harmful. Applying this classification approach for preparations, the following results:

   - Where the concentration of corrosive gas(es) in a preparation results in its classification as being "very toxic" or "toxic", then it is also classified as "corrosive".
   - Where the concentration of corrosive gas(es) in a preparation results in its classification as being "harmful", then it is also classified as "irritant".

This could be a practicable, safe and effective means of classifying such preparations, since no test methods are available. Intrinsically, there is no such thing as a "corrosive" gas; otherwise it would not be possible to package them in steel containers. Corrosivity results from the interaction with the humidity of air. The "p_H" of a gas or gaseous mixture cannot be sensibly measured.

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