

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

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Item 4 (a) of the provisional agenda

Development of guidance on the application of the Globally Harmonized System:
Practical classification issues

Follow-up to the inclusion of simple asphyxiants in annex 11

Transmitted by the experts from the European Union and the United
States of America

I. Introduction

1. Informal document INF.37 (forty-eighth session) highlighted the need for updates in section A4.3.2.3 of annex 4 to ensure consistency with the inclusion of simple asphyxiants in annex 11. The document proposed two options for updating the section and raised questions about terminology and additional information in annex 11.
2. As no replies or discussions took place during or after the forty-eighth session, this document aims to reopen the discussion and seek further input from the Sub-Committee.
3. First, there would be a need to update section A4.3.2.3 following the inclusion of simple asphyxiant to annex 11. Leaving annex 4 untouched would create an implicit differentiation between combustible dust and simple asphyxiants in safety data sheets.
4. To this end, experts from the European Union and the United States of America identified two options:
 - (a) Addition of similar provisions for “simple asphyxiant” in a similar way to “combustible dust” in section A4.3.2.3;
 - (b) A generic reference to hazards covered in annex 11 replaces the specific provisions for combustible dust in section A4.3.2.3. Clarifications (including those deleted from A4.3.2.3) are provided in annex 11 for each hazard on what kind of information should be provided in safety data sheets and in which section(s) they could be placed.
5. As annex 11 may cover more hazards in the future, we believe **option b** is a future-proof solution and could be the clearest one as well.
6. Second, section A4.3.2.3 uses the term ‘suffocation’ as one example of other hazards which do not result in classification. We wondered whether the terms “suffocation” (used in annex 4) and “simple asphyxiants”, (used in annex 11), may be confusing to some.
7. In the context of chemicals that may have an SDS (safety datasheet), the additional hazards related to ‘suffocation’ would mostly not be relevant (mechanical choking). However, for chemicals such as plastic or wood pellets, when accompanied by an SDS, asphyxiation and mechanical choking¹ may be relevant. Therefore, while generally ‘asphyxiation’ would be appropriate in A4.3.2.3, there could be exceptions where suffocation, a term that includes mechanical choking, is more appropriate.

¹ For example, in children and animals.

8. As shown in table I below, it is worth noting that in the Arabic, Chinese and Spanish translation of GHS revision 10 there may not be different wording for the English ‘suffocation’ and ‘asphyxiation’.

Table I: Translation of the English word ‘suffocation’ and ‘asphyxiations’ in GHS Rev.10.

Language	Suffocation	Asphyxiation
English	Suffocation	Asphyxiation
Arabic	الاختناق (Al-ikhtinaaq)	الاختناق (Al-ikhtinaaq)
Chinese	窒息 (Zhixī)	窒息 (Zhixī)
French	Suffocation	Asphyxie
Russian	Удушье (Udush'ye)	Асфиксия (Asfiksiya)
Spanish	Asfixia	Asfixia

9. Finally, annex 11 suggests phrases for hazard information (see e.g., section A11.2.7.3). However, there may be a need to consider additional information for annex 11.

II. Conclusion

10. The Sub-Committee is invited to support additional analysis by the experts from the European Union and the United States of America; as well as to express its interest in discussing questions such as:

- (a) Would you have any preference for any options in paragraphs 4 to 9?
 - (b) Do you have information on the overlap between ‘suffocation’ and ‘asphyxiation’?
 - (c) Do you have any views or ideas on the possible added value in additional information in annex 11?
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