

**ECETOC Document**

**No 18**

**ECETOC Statement on Skin  
Sensitisation Testing and Labelling  
under 6<sup>th</sup> Amendment**

**November 1982**

Brussels, November 5, 1982

LT/mdm/2213

ECETOC STATEMENT ON SKIN SENSITISATION TESTING AND  
LABELLING UNDER 6TH AMENDMENT

In a document "Skin Sensitisation" of October 29, 1980, ECETOC reviewed techniques for the laboratory assessment of skin sensitisation potential. The requirement for the R-phrase "may cause sensitisation by skin contact" in the European Communities 6th Amendment to the 1967 Directive on the Classification, Labelling and Packaging of Dangerous Substances, was considered and it was recommended that :

"if in an approved test on 20 animals, 3 or more give a positive result on the first epidermal challenge, irrespective of the severity the R-phrase will be required."

The document emphasised that :

"testing and labelling indicate sensitisation potential but not risk. Thus chemicals classified as potential human sensitisers are, and will continue to be, used in industry and by its customers with due precautions."

We now understand that the European Commission is considering a proposal that the R-phrase should be used if animal testing reveals that a substance or preparation is capable of producing a sensitisation reaction in a large number of individuals. (When the ECETOC document was written this latter specification was not known, and, indeed, may have come into consideration only at a later date). The Commission also propose that a positive response in 3/20 or more test animals, in one of the methods specified in annex V of the 6th Amendment, should lead to use of the R-phrase.

It was clear from the ECETOC report that by far the most used test is the Magnusson-Kligman maximisation technique, which is also the most sensitive. In this test a positive response in 3/20 animals reveals only weak sensitisation potential and would not correspond to an ability to sensitise a large number of people. Thus in a paper "The usefulness of guinea pig tests for the detection of contact sensitisers" (Advances in Modern Toxicology, vol. 4, Dermatotoxicology and Pharmacology, eds. Marzulli, F.N. and Maibach, H.I. (1977), chap 23, 551) Magnusson and Kligman state that in their maximisation test a positive response in 10/20 animals indicates moderate sensitisation potential, whereas substances which produce a positive response in 3/20 animals pose no hazard in consumer products. They arrived at these conclusions after comparing experience in humans with the results from their test.

Thus in the context of the current discussions within the European Commission, ECETOC recommends that when the Magnusson-Kligman maximisation test is used, adoption of the R-phrase is triggered by a positive response in 6/20 rather than 3/20 animals.

*L. Turner*  
L. Turner