

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 Transport of Dangerous Goods

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HARMONIZATION WITH GHS

Submitted by the Expert from the United Kingdom

1. In considering paper C4/2005/6 to be presented to the next session of the GHS Sub-Committee, members of the Transport Sub-Committee may find the United Kingdom transport sector guidance note below helpful in understanding how the GHS Building Block approach is intended to be applied. It may be appropriate to propose to the GHS Sub-Committee that, in addition to proposed amendments to Part 1 of the GHS book, this guidance might be included as an annex to the Building Block principles text.

GHS - THE BUILDING BLOCK APPROACH

THE UK UNDERSTANDING (Transport)

CLASSIFICATION

- The Competent Authority for a sector may determine whether or not it needs to address a particular endpoint for which criteria are offered in the GHS.

Example: the transport sector may decide that it does not need to address Reproductive Toxicity in its regulatory system

- If the Competent Authority for a sector does address an endpoint for which criteria are offered in the GHS, and the endpoint has only one category of hazard within it, that category must be applied without alteration of or deviation from the GHS criteria.

Examples: the endpoints 'Corrosive to Metals', and 'Respiratory Sensitisation' have only one category. If these endpoints are adopted they must be applied unchanged

- Where an endpoint is divided into more than one category, the competent authority for a sector may decide to use only those categories that are relevant to its purposes. However, it may not change the thresholds within any particular existing category addressed by GHS.

Example 1: for liquids, the endpoint of flammability is divided into four categories. The Competent Authority for the transport sector has chosen to use Categories, 1, 2 and 3 but not Category 4. Thus flammable liquids with a flash point > 60°C and ≤ 93°C are not addressed in the UN Model Regulations. However, the competent authority for transport has also amended the upper threshold of ≤60.5°C for its Packing Group III (the equivalent of GHS Category 3) to ≤60°C to align with the GHS threshold.

Example 2: for the end points of 'Acute toxicity: Oral, Skin and Inhalation' the GHS provides for 5 categories. Category 5 extends the criteria beyond the limits (e.g. 2000mg/kg bodyweight) presently used in EU classification system. In drawing up legal requirements to adopt the GHS in Europe, Member States could choose to adopt categories 1, 2, 3 and 4 only.

NOTE: In determining the categories they wish to adopt competent authorities should start with the most hazardous and, where more than one GHS category is adopted, categories should not be skipped.

- If the Competent Authority for a sector wishes to address an endpoint at thresholds outside the current GHS criteria i.e. above the maximum or below the minimum thresholds, it may do so and may set whatever categories it wishes to; provided that these do not overlap or alter the GHS criteria.

Example: for substances Hazardous to the Aquatic Environment a sector may wish to utilise a Category Acute 4 that extends beyond the current maxima for L(E)C₅₀ of 100 mg/l.

HAZARD COMMUNICATION

- GHS provides for hazard communication for the endpoints it addresses, but also recognises the continued use the existing transport labelling system and of other labelling and communication systems for information not included in GHS.

Example 1: the competent authority for the transport sector requires labels for the primary hazard of a substance and for any subsidiary hazards e.g. methanol, a flammable liquid, will be assigned a flammable liquid label for its primary hazard but also a toxic label for its toxicity subsidiary hazard.

Example 2: the competent authority for transport sector also sets labelling requirements for the transport of radioactive material, an endpoint not addressed in GHS.

- GHS labelling comprises three elements: a symbol; a signal word, and a hazard statement. The Competent Authority for a sector may choose to use one or more of these elements in communicating a hazard endpoint addressed by GHS.

Example: the transport sector utilises only the symbol element of hazard communication. However, in Europe the present requirements for supply make use of all three elements.

- Where the competent authority for a sector addresses an endpoint included in GHS, for the elements it utilises these must be as specified in GHS. However, the transport sector provides exemptions from labelling for substances posing a low risk in transport or requires marks rather than hazard class labelling (for example, dangerous goods packaged in limited quantities).

Example: for substances and mixtures causing serious damage/eye irritation in Hazard Category 2A the symbol must be an exclamation mark, the signal word must be 'Warning' and the Hazard Statement must be 'Causes serious eye irritation'. In transport, this endpoint is currently not addressed at all, but if transport did address this endpoint, and it wished to include Category 2A, it would be likely only to use the symbol which would have to be the exclamation mark.

- Where the Competent Authority for a sector addresses an endpoint included in GHS, and it makes use of one or more of the elements specified in GHS, it is not precluded from also using other labels or information it currently prescribes, where this does not overlap or affect the GHS elements.

Example 1: substances hazardous to the aquatic environment, or environmentally hazardous substances as they are referred to in the UN Model Regulations, are required to be marked with the 'dead fish/dead tree' symbol but must be labelled with the transport Class 9 white diamond with alternate black stripes in the upper half.

NOTE: in transport, this applies to substances that meet only the hazardous to the aquatic environment criteria. Substances that meet the criteria of any other endpoint addressed in transport but that may also meet the criteria of substances hazardous to the aquatic environment are labelled in accordance only with those other hazards.

SAFETY DATA SHEETS

- Where competent authorities specify that safety data sheets are required, e.g. for substances and mixtures supplied to workplaces, the format of the safety data sheets must be standard that prescribed in the GHS. However, where information under a heading is not applicable or not available this should be stated on the safety data sheet.

Example 1: for a substance that is only ever produced and used on-site there may be no need to complete heading 16 'Transport Information'.

Example 2: SDS's for substances used only outside Europe need not include the 'EC number'.