



Secretariat

Distr.
GENERAL

ST/SG/AC.10/C.4/2006/11
25 April 2006

Original: ENGLISH

**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

Eleventh session, 12 (p.m.)-14 July 2006
Item 3(e) of the provisional agenda

HAZARD COMMUNICATION ISSUES

Miscellaneous proposals

Pictograms for explosives of divisions 1.5 and 1.6

Transmitted by the European Chemical Industry Council (CEFIC)

Introduction

1. The GHS is inconsistent in its approach for designating GHS symbols and pictograms for explosives of Divisions 1.5 and 1.6. This does not affect the symbols or pictograms for the Transport of Dangerous Goods.

Background

2. Paragraph 1.4.10.4.2.3 states “Pictograms prescribed by the GHS but not the *UN Recommendations on the Transport of Dangerous Goods, Model Regulations*, should have a black symbol on a white background with a red frame sufficiently wide to be clearly visible.”

3. In Table 2.1.2 of chapter 2.1, the symbol requirement for explosives of Divisions 1.5 and 1.6 is stated to be “1.5/1.6 on orange background”.

4. In Annex 1 in the table for explosives, the pictogram requirements for explosives of Divisions 1.5 and 1.6, are given as “No pictogram 1.5/1.6 on orange background.”

GE.06-

5. In Annex 2 the symbol requirement for explosives of Divisions 1.5 and 1.6 is shown as the numerals 1.5 or 1.6 respectively on an orange coloured background.

6. In Annex 3, for explosives of Divisions 1.5, the entry for the symbol is stated as “No symbol”, and there is no table at all for Division 1.6.

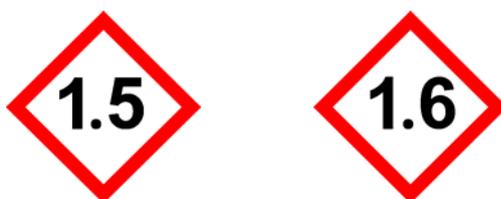
Discussion

7. GHS pictograms are only used in circumstances where the use of Transport of Dangerous Goods pictograms do not apply, for example in the workplace or on inner packagings packed in outer packagings. For explosives of Divisions 1.5 and 1.6, the requirement for either the numbers “1.5” or “1.6” on an orange background appears to be inconsistent with the provisions of paragraph 1.4.10.4.2.3. There is also an inconsistency between the requirements across Annexes 1, 2 and 3.

8. It is being proposed that the GHS “Exploding bomb” pictogram, as used in Annex 1 for the other Divisions of explosives should also be assigned for Divisions 1.5 and 1.6 as a GHS pictogram for use where the Transport of Dangerous Goods pictograms do not apply.

9. This would be consistent with the widespread use of the GHS “flame” pictogram which is used for flammable gases, flammable aerosols, flammable liquids, flammable solids, self-reactive substances, pyrophoric liquids, pyrophoric solids, self-heating substances, water reactive substances and organic peroxides.

10. As an alternative GHS pictogram, if some consistency with the Transport of Dangerous Goods pictograms for differentiation purposes is considered advisable, the numbers “1.5” or “1.6” in a red frame, as per the examples below, could be used.



However this would still leave Division 1.4 as inconsistent, as it is already assigned the GHS “exploding bomb” pictogram.

Proposal

11. In Table 2.1.2 of chapter 2.1, replace the symbol requirement for explosives of Divisions 1.5 and 1.6 with “exploding bomb *or* 1.5/1.6 on orange background”.

12. In Annex 1 in the table for explosives, replace the GHS pictogram requirements for explosives of Divisions 1.5 and 1.6 with the GHS “exploding bomb” pictogram.

13. In Annex 2 replace the symbol requirement for explosives of Divisions 1.5 and 1.6 with the “exploding bomb” symbol.
 14. In Annex 3, for explosives of Divisions 1.5, replace the entry for the symbol with the “exploding bomb” symbol.
 15. Create a new table in Annex 3 for Division 1.6.
-