

**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals**

8 June 2010

Sub-Committee of Experts on the
Transport of Dangerous Goods

Sub-Committee of Experts on the Globally
Harmonized System of Classification
and Labelling of Chemicals

Thirty-seventh session

Geneva, 21–30 June 2010

Item 10 of the provisional agenda:

**Issues relating to the Globally Harmonized System of
Classification and Labelling of Chemicals (GHS)**

Nineteenth session

Geneva, 30 June–2 July 2010

Item 4 (c) of the provisional agenda:

**Implementation of the GHS: Cooperation with
other bodies or international organizations**

**Comments on document ST/SG/AC.10/C.3/2010/10 Proposal
for amendments to Chapter 2.8**

Transmitted by the expert from the United Kingdom

Introduction

1. The expert from the United Kingdom has concerns about the revised Netherlands proposal to amend Chapter 2.8 to acknowledge alternative methods in GHS for skin corrosion in a new 2.8.3. Also, a good number of the comments submitted on the draft proposals by various States and NGOs (reflected in INF.7) based on the discussions and outcome of the Working Group meeting in December 2009 appear not to have been taken into account.

Discussion

2. That the relationship between GHS skin corrosion sub-categories and packing groups illustrated in the table in 2.8.3.1 is not a good basis for classification was accepted at the Working Group meeting in December. It was recognized that different methods had been used by transport and other systems such as supply and use. The key aspect is that it makes no difference to classification, packaging, and labelling in supply systems based on GHS which sub-category a substance or mixture is, as the symbol, signal word, and hazard statement are all exactly the same (see table 3.2.5 in GHS). However for transport, packing groups have great significance as they determine the particular transport requirements.

3. As was illustrated in ST/SG/AC.10/C.3/2009/50 from the United Kingdom, under EU CLP (European Regulation on the Classification, Labelling and Packaging of Substances and Mixtures), many common corrosive chemicals are subject to harmonized classification and labelling requirements with given specific concentration limits. This means that for all those substances a classification against the criteria shall not be performed as the sub-category is predetermined and allocated as shown in a published list. The consequences are that if the correlation between packing groups and skin corrosion sub-categories illustrated in the table in 2.8.3.1 is used, then a more stringent packing group would be allocated than determined by the transport rules. This will have a serious negative impact on the whole transport operation. The expert from the United Kingdom is very

concerned that this is likely to occur extensively if this table is retained as shown in the Netherlands proposal.

4. In the second sentence of 2.8.3.1 reference should also be made to mixtures as this is the terminology used in GHS.
5. In the third sentence of 2.8.3.1 “shall be used” should read “may be used” as the packing group cannot always be assigned particularly in the case of extreme pH.
6. In the second sentence under “Extreme pH” in 2.8.3.2, “A substance is considered” should read “A substance may be considered” as this is not always the case, in the same way that the absence of extreme pH is not proof of absence of skin corrosive properties.
7. As discussed at the Working Group meeting in December, it is proposed that all this new text should be put in a Note rather than as a new 2.8.3.
8. Given the problems that arise in applying the GHS corrosivity criteria in the transport context, the expert from the UK believes it would be appropriate for a full review of the GHS corrosivity criteria to be undertaken, involving representatives from both transport and GHS Subcommittees, with a view to finding a harmonised approach which is suitable for both transport and supply contexts. Such a review could be undertaken after the present editorial review of chapters 3.1 and 3.2 of GHS is complete.

Proposals

9. There are two options regarding the table in 2.8.3.1, either:
 - (a) delete the table and its heading; or
 - (b) add the following text directly after the table:

“The above table should not be used to assign a packing group on the basis of the GHS classification of a substance or mixture in skin corrosion sub-categories 1A, 1B and 1C, as it may lead to the assignment of an incorrect (higher than it should be) packing group for transport purposes.”
10. In the second sentence of 2.8.3.1 amend “substance” to read “substance or mixture”.
11. In the third sentence of 2.8.3.1 amend “shall be used” to read “may be used”.
12. Amend the first sentence of 2.8.3.2 to read “In the application of the classification methods for skin corrosivity in Chapter 3.2 of the GHS for transport purposes the following in particular should be noted.”
13. In the second sentence under “Extreme pH” in 2.8.3.2, amend “A substance is considered” to read “A substance may be considered”.
14. Amend “2.8.3” to read “*Note 1*.”, delete “2.8.3.1”, “2.8.3.2” and place all the text in italics.
15. As a consequence:
 - (a) amend the end of the second sentence of 2.8.2.2 to read “ criteria in 2.8.2.4, 2.8.2.5, and if necessary *Note 1* at the end of this Chapter”; and
 - (b) the present “*Note*” to read “*Note 2*”.