

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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Hazard communication issues

Progress report on work of the informal correspondence group on hazard communication for corrosive to metals

**Transmitted by the International Association for Soaps, Detergents and
Maintenance Products (AISE) on behalf of the informal
correspondence group**

Background documents

INF.31 (19th session); ST/SG/AC.10/C.4/2010/7; INF.21 (20th session); INF.32 (20th session); INF.22 (20th session)

Introduction

1. At the 20th session in December 2010, the Sub-Committee of Experts on the GHS agreed the following competent authority option in GHS 1.4.10.5.5 to address potential issues which may arise if the physical hazard ‘Corrosive to Metals’ is adopted for supply/use situations:

“Where a substance or mixture is classified as corrosive to metals but not corrosive to skin and/or eyes, the competent authority may choose to allow the hazard pictogram linked to corrosive to metals to be omitted from the label of such substances or mixtures which are in the finished state, packaged for consumer use.”

2. However, the Sub-Committee considered this amendment to be a temporary solution thus agreed that an informal correspondence group should be established to develop a permanent solution in the biennium 2011 – 2012.

3. The following terms of reference were agreed for the informal correspondence group:

(a) Develop possible permanent solutions to address the identified issues associated with the adoption of the hazard class ‘corrosive to metals’ in the supply/use sector; and

(b) Explore the workability of having different pictograms to distinguish between “corrosive to metals” and “skin/eye corrosion” as proposed in INF.22 (20th session).

4. This informal document summarises the activities of the correspondence group to date.

Activities report

5. Twenty four experts have expressed an interest in participating in the work of the correspondence group.

6. The first meeting of the correspondence group took place by conference call on 25th March 2011. The objective of this conference call was to:

(a) “brainstorm” possible options for a permanent solution to address the identified issues associated with the adoption of “corrosive to metals” in the supply/use sector;

(b) initiate a pro/con analysis of the identified options; and

(c) agree on the possible option(s) to be progressed.

7. The five possible options considered by the conference call participants, along with the associated initial pro/con analysis, are set out in Annex I.

8. Several conference call participants favoured option 3 (different pictograms for the different types of corrosion) and proposed that it should be explored as a possible way forward on the basis that:

(a) It would address the hazard communication issues identified in INF.31 and 2010/7;

(b) The relevant pictogram would appear on the label – pictogram considered important for communication in that it serves as a quick visible reminder that need to take care when handling the product;

(c) There is no need to distinguish between consumer and professional/workplace;

(d) No competent authority option is needed as pictograms for a particular type of corrosion hazard are defined.

9. The conference call participants also noted that a competent authority still has the option not to adopt a building block (in this case, “corrosive to metals”) for a particular sector.

Next steps

10. The correspondence group would welcome comments from the Sub-Committee on the five potential options set out in Annex I and the proposal to explore option 3 (different pictograms for the different types of corrosion) as a possible way forward.

11. The correspondence group would also welcome suggestions from the Sub-Committee for other possible options for a permanent solution to address the identified issues associated with the adoption of ‘corrosive to metals’ in the supply/use sector.

12. It is recognised that discussion on this topic at the TDG Sub-Committee may be required.

Annex I

Possible options for a permanent solution to address the identified issues associated with the adoption of the hazard class ‘corrosive to metals’ in the supply/use sector.

Option 1

Make the current competent authority option in GHS 1.4.10.5.5 (as adopted by the Sub-Committee in Dec 2010) the permanent solution

Rationale:

Label elements not a building block; however certain exceptions made for transport (e.g. GHS 1.1.3.1.2 “...such elements as signal words and hazard statements are not expected to be adopted in the transport sector.”; GHS 1.4.1.5 “...UNSCETDG may choose not to include as signal words and hazard statements as part of the information included on the label...”) thus why not for consumers?

PRO –

- (i) Allows the various sectors to select label elements appropriate to the sector e.g. the workplace sector can retain the pictogram.
- (ii) The hazard corrosive to metals is still communicated on the label for consumer products via the hazard and precautionary statements.
- (iii) Nothing changes for the transport sector.

CON –

- (i) Could lead to different labelling in different countries if competent authorities have freedom of choice to allow the labelling exemption.
- (ii) Need to define ‘consumer sector’ - many products sold as consumer products are also used professionally and in the workplace. For instance, the same product may be sold to, and used by, both consumers and professional users in which case differentiated labelling would cause disharmonisation and confusion.
- (iii) No pictogram on the label – pictogram considered important for communication in that it serves as a quick visible reminder that need to take care when handling the product.

Option 2

Insert a clear statement that the hazard class Corrosive to Metals is not relevant for consumers i.e. statement in Annex 1 to the GHS along the lines of the statement “Not required under the UN Model Regulations” which appears in certain hazard classes/categories.

“Not required under the UN Model Regulations” is included for the following hazard classes/categories – Flammable Gases Cat. 2, Flammable Liquids Cat. 4, Self-Reactive Substances and Mixtures Type G, Organic Peroxides Type G, Acute Toxicity

Oral/Skin/Inhalation Cat. 4 / Cat. 5, Skin Corrosion/Irritation Cat. 2/Cat. 3, Serious Eye Damage/Eye Irritation, Respiratory Sensitisation, Skin Sensitisation, Germ Cell Mutagenicity, Carcinogenicity, Toxic to Reproduction, STOT (Single Exposure), STOT (Repeated Exposure), Aspiration Hazard, Aquatic Hazard (Acute) Cat. 2/Cat. 3, Aquatic Hazard (Long-Term) Cat. 3/Cat. 4, Hazardous to the Ozone Layer.

Annex 1 entry for Corrosive to Metals could be something along the lines of:

CORROSIVE TO METALS				
Category 1	-	-	-	Note
 <p>Warning May be corrosive to metals</p>				<p>Under the UN Recommendations on the Transport of Dangerous Goods, Model Regulations, pictogram colours:</p> <p>Symbol (corrosion): black; background: upper half: white; lower half: black with white border; Figure “8” in the bottom corner: white.</p>
				
Not required for substances and mixtures which are in the finished state, packaged for consumer use.				

Rationale:

GHS 1.1.3.1.5.3 “While physical hazards are important in the workplace and transport sectors, consumers may not need to know some of the specific physical hazards in the type of use they have for a product.”

PRO –

- (i) Clear statement that corrosive to metals is not relevant for consumer products – helps competent authorities identify relevant building blocks when developing their legislation implementing GHS.
- (ii) All labelling elements retained for the workplace.
- (iii) Nothing changes for transport.

CON –

- (i) Talks about consumer use – sometimes difficult to differentiate between consumer and professional. Many products sold as consumer products are also used professionally and in the workplace – could potentially end up with a consumer product with no hazard communication about corrosive to metals being used professionally.
- (ii) No hazard communication regarding corrosive to metals on consumer products.

Option 3

Different pictograms (as proposed by France in INF.22 – merit to distinguish the two hazards) e.g.:

CORROSIVE TO METALS and SKIN/EYES	CORROSIVE TO METAL (only)	CORROSIVE TO SKIN/EYES (only)
		

PRO –

- (i) Easy to distinguish between those substances/mixtures corrosive to skin (and hence by implication corrosive to metals) and those only corrosive to metals but not corrosive to skin.
- (ii) Emergency responders would know instantly what type of hazard i.e. physical or health – may adopt different approach if know that only dealing with corrosive to metals rather than corrosive to skin.
- (iii) No need to differentiate between consumer and workplace.
- (iv) Pictogram appears on the label – pictogram considered important for communication in that it serves as a quick visible reminder that need to take care when handling the product.

CON –

- (i) More pictograms – could be managed if precedence rules established thereby reducing the number of pictograms required on a label.
- (ii) Difficult to introduce new pictograms.
- (iii) Changes may impact on the transport sector – will need to dialogue with transport colleagues (alternatively, could just adopt the different corrosion pictograms for supply i.e. consumer and workplace).
- (iv) Potential costs associated with having to change pictograms on a wide range of substances and mixtures that carry the existing corrosive pictogram – however, costs could be mitigated if use of the ‘split’ pictograms were to be optional for suppliers.

Option 4

Add a new pictogram to distinguish “corrosive to eye” to those presented in Option 3 above

Issue:

Various permutations of corrosivity

- (i) corrosive to metals but not corrosive to skin/eyes,
- (ii) corrosive to skin/eyes and corrosive to metals, and
- (iii) corrosive to eyes but not corrosive to skin or metals e.g. some surfactants.

Current corrosive pictogram gives no indication of eye damage yet is assigned to Eye Cat 1 i.e. substances/mixtures not corrosive to skin or corrosive to metals. Suggest a different pictogram is needed for substances and mixtures only classified as Eye Cat 1 e.g. something along the lines of:



PRO –

Easy to distinguish between those substances/mixtures corrosive to eyes but not corrosive to skin or metals.

CON –

- (i) More pictograms – could be managed if precedence rules established thereby reducing the number of pictograms required on a label.
- (ii) Difficult to introduce new pictogram.

Consequential changes:

Should different pictograms be adopted for the various types of corrosivity, some additional text will be required for GHS 1.4.10.5.3.1 “Precedence for the allocation of symbols”.

Possible precedence rules if different pictograms are assigned to the various types of corrosivity:



Option 5

Delete the hazard pictogram label element completely in Chapter 2.16 (with consequential amendments throughout the GHS).

The signal word and hazard statement would remain and be applied throughout the “supply/use” sector including consumers.

Table 2.16.2 would be modified accordingly:

Table 2.16.2: Label elements for substances and mixtures corrosive to metals

	Category 1
Symbol	<i>No symbol</i>
Signal word	Warning
Hazard statement	May be corrosive to metals

PRO –

- (i) Hazard ‘corrosive to metals’ is communicated throughout the ‘supply & use’ sector including consumers.
- (ii) No need to single out and define a ‘consumer sector’ – many products sold as consumer products are also used professionally and in the workplace. For instance, the same product may be sold to, and used by, both consumers and professional users in which case differentiated labelling would cause disharmonisation and confusion.
- (iii) Nothing changes for the transport sector i.e. the warning label for transport is retained and remains unchanged (GHS Annex 1 table would still show the transport pictogram).

CON –

- (i) No pictogram on the label – pictogram considered important for communication in that it serves as a quick visible reminder that need to take care when handling the product.