

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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Item 7 of the provisional agenda

Programme of work for the biennium 2013–2014

Programme of work for the biennium 2013-2014: aspiration hazard – classification of aerosol/mist products

Transmitted by the expert from Sweden

I. Introduction

1. Section 3.10.1.6.5 of GHS states specific considerations for classifying aerosol and mist products for aspiration hazard:

“3.10.1.6.5 Classification of aerosol/mist products

Aerosol and mist products are usually dispensed in containers such as self-pressurized containers, trigger and pump sprayers. The key to classifying these products is whether a pool of product is formed in the mouth, which then may be aspirated. If the mist or aerosol from a pressurized container is fine, a pool may not be formed. On the other hand, if a pressurized container dispenses product in a stream, a pool may be formed that may then be aspirated. Usually, the mist produced by trigger and pump sprayers is coarse and therefore, a pool may be formed that then may be aspirated. When the pump mechanism may be removed and contents are available to be swallowed then the classification of the products should be considered.”

2. As stated that “the key to classifying these products is whether a pool of product is formed in the mouth, which then may be aspirated” seems particularly odd and misplaced.

3. There may be certain circumstances for special labelling arrangements as with section 1.4.10.5.4.4 (small packagings) and 1.4.10.5.5 (special labelling arrangements) which are partly based on the *risk* with the specific product. We strongly question, however, that there is a need to let the classification of aerosol and mist products for Aspiration hazard be based on risk analysis, which is against the most fundamental principle of hazard classification, i.e. intrinsic properties.

II. Proposal

4. We propose that section 3.10.1.6.5 is reviewed in order to align the criteria with the general principles for hazard classification and hazard communication and ask the Sub-Committee to consider this as an item in the programme of work for the next biennium.