

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

7 June 2012

**Sub-Committee of Experts on the
Transport of Dangerous Goods**

Forty-first session

Geneva, 25 June – 4 July 2012

Item 2 (f) of the provisional agenda

Explosives and related matters: miscellaneous

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

Twenty-third session

Geneva, 4 – 6 July 2012

Item 2 (a) (i) of the provisional agenda

**Updating of the Globally Harmonized System of
Classification and Labelling of Chemicals (GHS):
physical hazards, explosives and related matters**

Difficulties in carrying out classification tests

Transmitted by the chairman of the explosives working group

Introduction

1. At the thirty-ninth session of the Sub-Committee of Experts on the Transport of Dangerous Goods informal document INF.25 from Canada was discussed. This paper addressed a survey initiated by the two working groups of the International Group of Experts on the Explosion Risks of Unstable Substances (IGUS) on the subject of difficulties in carrying out classification tests, amongst others concerning the availability of materials specified in the Manual of Tests and Criteria and possible over-specification of materials. The subject was also discussed in the Explosives Working Group of the TDG Sub-Committee and there was agreement that the problem of specifications in the test procedures was real and should be corrected.
2. The working group also identified that there could be other problems such as errors in procedure, incorrect use of the examples in the procedures, and a difficulty in identifying the key parameters of the tests.
3. The Sub-Committee agreed that it should conduct a review of the tests mentioned in Parts I and II of the Manual with a view to:
 - (a) Better defining the specifications of the tests;
 - (b) Better defining the tolerances associated with those specifications; and
 - (c) Removing any unnecessary or over-specifications.
4. This position was endorsed by the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (see ST/SG/AC.10/C.4/42; paragraph 9).
5. The subject was further discussed at the meetings of the IGUS working groups in May in Berlin. Experts from the Netherlands and the International Council of Chemical Associations (ICCA) presented a general approach identifying several levels of updates.
 - (a) Mistakes in the Manual of Tests and Criteria; resulting in corrections and editorial changes.

- (b) Improvements, deletion of superfluous text not affecting the test method, test result and criteria (e.g. delete details in specifications, update test procedure, drawings, etc.)
- (c) Change text of test to reflect actual/common practice in conducting the test. Examples are: the wood stack in the 6 (c) test, the ignition method in the Time/Pressure test and the description of test H4.
- (d) Change the text of a test method to improve the method.
- (e) Introduce alternative tests for tests that are hardly ever or never conducted, e.g. tests H2 and H3.
- (f) Deletion of tests (like done in the past with tests E.4 and F.5, e.g. A.2 TNO 50/70 detonation test.
- (g) Change the so called “recommended tests”.

6. It is realised that trying to address all above mentioned levels is overly ambitious and can not be realised within a reasonable time frame. As a thought starter it is proposed to limit the scope of the activities to items (a), (b) and (possibly) (c). Even with the limited scope, the work will take several years. Proposals for revision of selected sections of Part I and II of the Manual can be anticipated in the next biennium. However, the work will most likely not be finished in the next biennium.

7. Several parties involved in the discussions have indicated the intention of participating in and contributing to a correspondence group to address the issues mentioned. Such a correspondence group could involve experts from the TDG and GHS sub-committees and working groups, participants to the IGUS working groups and other interested parties. As indicated before, the chairman of the working group is willing to coordinate these activities and to report back to the both sub-committees.

Proposal

8. The sub-committees on TDG and GHS are invited to discuss the general principle outlined, include this activity in their next programme of work and take action as deemed appropriate.
