

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

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

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Item 10 (c) of the provisional agenda

**Issues related to the Globally Harmonized System
of Classification and Labelling of Chemicals:
Classification criteria for flammable gases**

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

Twenty-ninth session

Geneva, 29 June – 1 July 2015

Item 2 (b) of the provisional agenda

**Classification criteria and related hazard
communication: Classification criteria for flammable
gases**

**Comments on the report of the Joint TDG-GHS informal
working group dealing with categorization of flammable
gases [UN/SCEGHS/29/INF.3 - UN/SCETDG/47/INF.5]**

Transmitted by the expert from the United States of America

Introduction

1. This informal paper provides comments on the report submitted by the Joint TDG-GHS Informal Working Group addressing categorization of flammable gases (UN/SCEGHS/29/INF.3 - UN/SCETDG/47/INF.5).
2. The expert from the United States of America would like to thank the delegates from Belgium and Japan for their continued work and leadership of this issue. In particular, the expert from the United States of America would like to thank Belgium and Japan for their consideration for those delegations that could not travel to the meetings by providing summations of the in-person intersessional meetings for these delegates.

Background

3. The flammable gases chapter has undergone several revisions since it was originally adopted by the GHS Sub-Committee. In particular, the categories for chemically unstable gases were added to the chapter during the 2009-2010 biennium, and the hazard category pyrophoric gases was added during the 2013-2014 biennium. The classification criteria, hazard communication, and decision logics and guidance developed for chemically unstable gases and pyrophoric gases required international cooperation, cooperation between the TDG and the GHS sub-committees, and occurred over the course of several sub-committee meetings.
4. The classification criteria, hazard communication, and decision logics and guidance for chemically unstable gases is intended to address additional categories if a substance or mixture is classified into one of the flammable gases hazard categories. These additional categories have been assigned letters A and B to delineate classification between the more or less severe hazard. To that end, a chemically unstable gas could be assigned as a

flammable gas Category 1 and Category A; Category 1 and Category B; Category 2 and Category A; or Category 2 and Category B, depending on the hazard(s).

5. The classification criteria, hazard communication, and decision logics and guidance for pyrophoric gases is intended to address a separate hazard category within the flammable gases hazard class. According to the classification criteria established for pyrophoric gases, these gases are assigned Category 1 and Category Pyrophoric Gas or Category 2 and Category Pyrophoric Gas.

6. At this time, gas experts are not aware of any known pyrophoric gases that would be classified as a Category 2 and Category Pyrophoric Gas. However, the decision logics in the chapter allow for all combinations of hazard categories should a pyrophoric gas be identified and classified as a Category 2 and Category Pyrophoric Gas in the future.

Comments

7. With the many recent changes made to the flammable gases chapter of the GHS, the expert from the United States of America is concerned that any changes made to the chapter may cause confusion or misinterpretation of the existing classification criteria, hazard communication, and decision logics and guidance agreed upon for chemically unstable gases and pyrophoric gases.

8. Therefore, the expert from the United States of America requests that the Joint TDG-GHS Informal Working Group not only address categorization of flammable gases of Category 1 gases but review how a new Category 1b would interact with the other criteria (e.g., Pyrophoric gases and Chemically Unstable gases) of the chapter to ensure that the classification criteria, hazard communication, and decision logics and guidance of the flammable gases addressed by this chapter are not compromised and are presented in a clear, concise manner.

9. The expert from the United States of America also requests that the informal correspondence group continue to provide a way for those who cannot attend the meetings in person to participate actively in the meeting discussions. There are many ways to accomplish this by use of available technology and the expert from the United States of America encourages the Chair of the informal working group to take advantage of such technology.
