

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

16 November 2015

Sub-Committee of Experts on the Transport of Dangerous Goods

Forty-eighth session

Geneva, 30 November – 9 December 2015

Item 10 (e) of the provisional agenda

Issues relating to the Globally Harmonized System of Classification and Labelling of Chemicals:

Corrosivity criteria

Proposal for revision of chapter 2.8 of the Model Regulations: Classification and assignment to packing groups for mixtures

**Transmitted by the European Chemical Industry Council (CEFIC) and
the International Association for Soaps, Detergents and Maintenance
Products (AISE)**

Purpose

1. At the forty-seventh session of the Sub-Committee of Experts on the Transport of Dangerous Goods (TDG), discussions continued with regards to proposed changes to Chapter 2.8 of the UN Model Regulations. It has become clear during these discussions that both the adoption of alternative methods from the Globally Harmonised System (GHS) as well as applying a more general approach to this topic (UN/SCETDG/47/INF.25) proved difficult to get consensus on.
2. Better overall alignment was reached on the general approach outlined in the proposal submitted by the expert from Spain (UN/SCETDG/47/INF.24). However, the proposed additional physicochemical criteria, the reference to GHS and the fact that the proposal would also be applicable for substances met some resistance. CEFIC/AISE would therefore propose an alternative to the general approach from the Spanish expert. The aim of this proposal is to reduce and simplify the actual changes to Chapter 2.8 and therewith to better focus further discussions.
3. Regarding the proposed additional physicochemical criteria for assigning a packing group, CEFIC/AISE is of the opinion that both the criteria itself as well as any accompanying threshold limits cannot be properly introduced and justified without supporting data, which is currently lacking. However, to reduce concerns about potential under-classification of mixtures containing small amounts of Packing Group I ingredients, the current proposal introduces additional concentration-based criteria for such mixtures.

Introduction

4. CEFIC/AISE is of the opinion that the core issue with the current approach in Chapter 2.8 is the lack of appropriate alternative methodology to testing provisions for the assignment of packing groups for mixtures. Any such alternatives should lead to risk-proportionate assignment of packing groups; both avoiding overestimations as much as underestimations.

5. The present proposal provides an alternative method for the assignment of packing groups for mixtures, not substances, and avoids any link to GHS and debatable additional physicochemical criteria. CEFIC /AISE is of the opinion that the application of an alternative method in transport has to be based on the transport classification and packing group assignment of the ingredients as provided in the Dangerous Goods List or as declared by the consignor. A “translation” of a GHS classification is not practicable because of the use of local implementations of GHS and not the UN-GHS as such. These local implementations of GHS are in many jurisdictions linked to lists of legally binding classifications. Simply “translating” a local GHS classification into a TDG classification may therefore lead to inconsistencies on a global basis.

Proposal

6. Add new paragraphs to chapter 2.8:

Classification and assignment of packing groups for mixtures

2.8.2.6

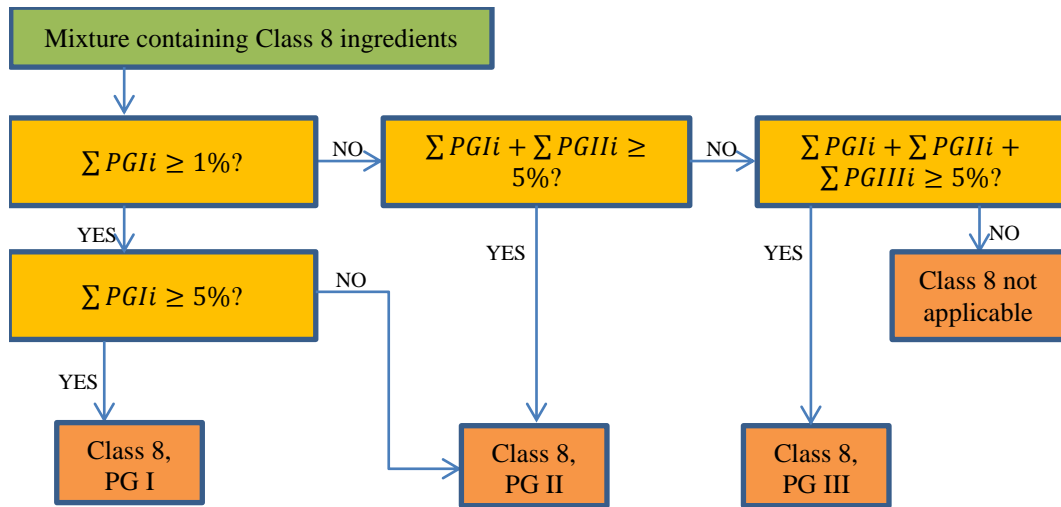
For liquid mixtures, or solid mixtures that may become liquid during carriage, where test data according to 2.8.2.4 is available, this information shall be used to assign the mixture to Class 8 and to the appropriate packing group. Where no such test data is available, mixtures shall be considered for assignment to Class 8 when containing Class 8 ingredients.

Where a mixture contains ingredients for which no information on their corrosive properties is available, the mixture shall be considered as Class 8 if it has an extreme pH-value (≤ 2 or $\geq 11,5$) and shall be assigned to Packing Group I, or Packing Group II if conclusive information is available for justification.

2.8.2.7

To determine whether a mixture containing Class 8 ingredients shall be considered to be allocated to Class 8 and to assign a Packing Group, scheme 2.8.2.7 shall be applied. When a specific concentration limit is assigned to an ingredients following its entry in the Dangerous Goods List, this limit shall be used instead of the generic limits in scheme 2.8.2.7. The generic cut-off value for the corrosive ingredients to be taken into account is 1%, or <1% if there is a presumption that the ingredients present at a concentration <1% can still be relevant for classifying the mixture to be corrosive to skin.

Scheme 2.8.2.7



Mixtures which, on basis of 2.8.2.6 and/or the scheme 2.8.2.7 are not judged to cause full thickness destruction of intact skin shall be considered for their potential to cause corrosion to certain metal surfaces in accordance with the criteria in 2.8.2.5 (c) (ii).