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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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**Issues relating to the Globally Harmonized System
of Classification and Labelling of Chemicals: Use
of the Manual of Tests and Criteria in the context
of the GHS**

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

Thirty-first session

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Item 2 of the provisional agenda

**Joint work with the Sub-Committee of Experts on the
Transport of Dangerous Goods (TDG Sub-Committee)**

Revision of the Manual of Tests and Criteria: Chapter 1

Transmitted by the Chairman of the Working Group on Explosives on behalf of the Working Group

This document and its addenda contain a proposed revised text of the Manual of Test and Criteria to take account of its use in the context of the GHS, for consideration by both sub-committees.

The document is divided as follows:

- TDG/49/INF.4 – GHS/31/INF.3: Chapter 1
- TDG/49/INF.4/Add.1 – GHS/31/INF.3/Add.1: Part I (Chapters 10 to 17)
- TDG/49/INF.4/Add.2 – GHS/31/INF.3/Add.2: Part I (Chapter 18)
- TDG/49/INF.4/Add.3 – GHS/31/INF.3/Add.3: Part II (Chapters 20 to 28)
- TDG/49/INF.4/Add.4 – GHS/31/INF.3/Add.4: Parts III, IV and V (Chapters 30 to 51)
- TDG/49/INF.4/Add.5 – GHS/31/INF.3/Add.5: Appendices

Note by the secretariat: Although this proposal was received in due time for issuance as an official document, and should be considered as an official proposal, it is reproduced in English only as an informal document since editorial work is still expected and therefore, due to the size of the documents, the secretariat considers that it is premature to have it translated into French at this stage.

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Comment [Ed1]: some suggested to retain the reference to transport (also in TS4), others suggested to replace 'too dangerous' by 'too sensitive'

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~~SECTION~~ CHAPTER 1

GENERAL INTRODUCTION

NOTE: *This general introduction relates only to Parts I to III of the Manual of Tests and Criteria and its Appendices 1 to 9. At its second session (10 December 2004), the Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals decided to add a new Part IV relating to tests methods concerning transport equipment. At its seventh session, the Committee of Experts on the Transport of Dangerous Goods and the Globally Harmonized System of Classification and Labelling of Chemicals decided to add a new Part V relating to classification procedures, test methods and criteria relating to sectors other than transport.*

1.1 Introduction

1.1.1 The purpose of this text is to present the United Nations schemes for the classification of certain types of dangerous goods and to give descriptions of the test methods and procedures considered to be the most useful for providing competent authorities with the necessary information to arrive at a proper classification ~~of substances and articles for transport.~~

1.1.2 The Manual of Tests and Criteria should be used in conjunction with the latest versions of:

- (a) the Recommendations on the Transport of Dangerous Goods (hereafter referred to as the Recommendations) and ~~of the Model Regulations on the Transport of Dangerous Goods~~ annexed ~~thereto these Recommendations~~ (hereafter referred to as the Model Regulations); and
- ~~(a)~~(b) the Globally Harmonized System of Classification and Labelling of Chemicals (hereafter referred to as the GHS).

1.1.~~2~~3 It should be noted that the Manual of Tests and Criteria (hereafter referred to as the Manual) is not a concise formulation of testing procedures that will unerringly lead to a proper classification of products. It therefore assumes competence on the part of the testing authority and leaves responsibility for classification with them. The competent authority has discretion to dispense with certain tests, to vary the details of tests, and to require additional tests when this is justified to obtain a reliable and realistic assessment of the hazard of a product. In some cases, a small scale screening procedure may be used to decide whether or not it is necessary to perform larger scale classification tests. Suitable examples of procedures are given in the introductions to some test series and in Appendix 6. Examples which may be listed within various test procedures are for illustrative purposes and are provided for guidance only.

1.1.4 The term substance in this Manual includes both substances and mixtures, unless otherwise stated.

1.1.~~5~~5 In situations where the proper classification of substances and articles of certain Hazard Classes ~~or Divisions for transport~~ is the responsibility of the Competent Authority, it is normal and accepted practice that due consideration will be given to testing or classification results of other Competent Authorities when provided.

1.1.6 Definitions of terms used in the Manual may be found in Chapter 1.2 of the Model Regulations and of the GHS.

1.2 Hazard classes in the Model Regulations and in the GHS

1.2.1 Hazard classes in the Model Regulations

1.2.1.1 Substances and articles subject to the Model Regulations are assigned to one of nine classes according to the hazard or the most predominant of the hazards they present for transport. The Model Regulations define 9 hazard classes. Some of these classes are subdivided into divisions addressing a more specific type of hazard within a given class. The numerical order of the classes and divisions is not that of the degree of danger.

1.2.1.2 In addition, for packing purposes, some dangerous goods are assigned to three packing groups in accordance with the degree of danger they present:

- _____ Packing group I: high danger
- _____ Packing group II: medium danger
- _____ Packing group III: low danger

The packing group to which a substance is assigned is indicated in the Dangerous Goods List in Chapter 3.2 of the Model Regulations. Articles are not assigned to packing groups.

1.2.1.3 Dangerous goods meeting the defining criteria of more than one hazard class or division which are not listed in the Dangerous Goods List are assigned to a transport class and division and subsidiary risk(s) on the basis of the precedence of hazards characteristics.

1.2.1.4 Precedence of hazard characteristics for transport purposes

1.2.1.4.1 The table in 2.0.3.3 of Chapter 2.0 of the Model Regulations may be used as a guide in determining the class of a substance having more than one risk, when it is not named in the Dangerous Goods List in Chapter 3.2 of the Model Regulations. For goods having multiple risks, which are not specifically listed by name in Chapter 3.2 of the Model Regulations, the most stringent packing group denoted to the respective hazard of the goods takes precedence over other packing groups, irrespective of the precedence of hazard table in 2.0.3.3 of Chapter 2.0 of the Model Regulations.

1.2.1.4.2 The precedence of hazard characteristics of the following are not dealt with in the Precedence of hazard table in Chapter 2.0 of the Model Regulations, since these primary characteristics always take precedence:

- _____ Substances and articles of Class 1;
- _____ Gases of Class 2;
- _____ Liquid desensitized explosives of Class 3;
- _____ Self-reactive substances and solid desensitized explosives of Division 4.1;
- _____ Pyrophoric substances of Division 4.2;
- _____ Substances of Division 5.2;
- _____ Substances of Division 6.1 with a packing group I inhalation toxicity;
- _____ Substances of Division 6.2; and
- _____ Radioactive material of Class 7.

1.2.1.4.3 Self-reactive substances, except for type G, giving a positive result in the self-heating test N.4, should not be classified as pyrophoric liquids or solids but as self-reactive substances (see paragraph 2.4.2.3.1.1 of the Model Regulations). Organic peroxides of type G having properties of another hazard class (e.g. UN 3149) should be classified according to the requirements of that hazard class.

Comment [Ed2]: Is there a need for a paragraph on 'not-self-classification' ?

1.2.2 Hazard classes in the GHS

The GHS addresses classification of substances by type of hazards (physical, health and environmental hazards). Some of the GHS hazard classes are subdivided into hazard categories indicating the severity of the hazard, with Category 1 indicating the most severe hazard.

Comment [Ed3]: There seems to be a lack of balance on text for TDG and GHS

1.2.3 Relationship between the Model Regulations and the GHS

1.2.3.1 Since the GHS address also sectors other than transport (e.g. storage and supply and use), the hazard classes have been organized differently and as a consequence not all the classes defined in the Model Regulations have an equivalent GHS hazard class. For instance, there is not a specific hazard class in the GHS for radioactive material (Class 7 in transport) and some of the dangerous goods classified for transport in Class 9 are, either not addressed by the GHS (e.g. articles such as lithium batteries) or are covered by other GHS hazard classes (e.g.: environmentally hazardous substances of Class 9, which may fall under the GHS hazard class "dangerous for the aquatic environment").

Comment [Ed4]: Need to include the principles of self-classification, intrinsic properties, etc. ?

1.2.3.2 In addition, while one transport class may cover different types of hazards, GHS hazard classes usually address one hazard each. For instance, substances of Class 4 in transport, belong to six individual GHS hazard classes. Also, while transport classes are identified by a number (Classes 1 to 9), GHS hazard classes are identified by type of hazard and are not numbered. Moreover, the concept of precedence of hazards as defined in the Model Regulations (see 1.1.4.1.4) does not exist in the GHS.

Comment [Ed5]: This can be understood as 'presumptuous' : transport is the norm and GHS is different

1.2.3.3 The correspondence between transport classes and the GHS hazards addressed in the Model Regulations is given in Table 1.1.

Comment [Ed6]: Suggestion made by someone : '1.2.3.3 [Rough draft] The classification of physical hazards may be appropriately modified by dilution or incorporation into articles [e.g. current TDG work led by UK], and is not solely based on intrinsic properties. Classifications issued by a competent authority also take into account the effects of incorporation into articles and packaging, for example, for explosives. In these cases the application of GHS labeling in packaged and unpackaged scenarios is specifically addressed in GHS 2.1.3 [e.g. our current work on GHS 2.1.3].

Table 1.1 :

Correspondence between GHS hazards addressed in the Model Regulations and transport classes

GHS hazard classes	Hazard classes in the Model Regulations
Explosives (Divisions 1.1 to 1.6)	Class 1 (Divisions 1.1 to 1.6)
Flammable gases (categories 1 and 2)	Class 2 (Division 2.1)
Aerosols (categories 1 and 2)	Class 2 (Division 2.1)
Aerosols (category 3)	Class 2 (Division 2.2)
Oxidizing gases (Category 1)	Class 2 (Division 2.2)
Gases under pressure (Compressed, liquefied, refrigerated liquefied, dissolved)	Class 2
Flammable liquids (categories 1, 2 and 3)	Class 3
Flammable solids (categories 1 and 2)	Class 4 (Division 4.1)
Self-reactive substances (Types A to G)	Class 4 (Division 4.1, Types A to G)
Pyrophoric liquids (Category 1)	Class 4 (Division 4.2)
Pyrophoric solids (Category 1)	Class 4 (Division 4.2)
Self-heating substances (categories 1 and 2)	Class 4 (Division 4.2)
Substances which, in contact with water, emit flammable gases (categories 1, 2 and 3)	Class 4 (Division 4.3)
Oxidizing liquids (categories 1, 2 and 3)	Class 5 (Division 5.1)
Oxidizing solids (categories 1, 2 and 3)	Class 5 (Division 5.1)
Organic peroxides (Types A to G)	Class 5 (Division 5.2, Types A to G)
Corrosive to metals (Category 1)	Class 8
Skin corrosion (Category 1)	Class 8
Acute toxicity (Liquids and solids) (categories 1, 2 and 3)	Class 6 (Division 6.1)
Acute toxicity (Gases) (categories 1, 2 and 3)	Class 2, Division 2.3
Dangerous to the aquatic environment (Acute 1 and Chronic 1 and 2)	Class 9 (environmentally hazardous substances)
Dangerous to the aquatic environment (Acute 2 and Chronic 3 and 4)	Not considered dangerous goods

1.2.3.4 [Rough draft, with less chance of success than above] The competent authority may choose to waive health hazard communication in the case of certain physical hazards [e.g. CLP 1.3.5 ; stated desire of AEISG ; desire of SAAMI, and likely IME].

1.2.3 Layout

1.2.3.1 The classification procedures, test methods and criteria are divided into three parts:

- Part I: those relating to ~~assignment of explosives to Class 1;~~
- Part II: those relating to ~~assignment of self-reactive substances to Division 4.1 and of to organic peroxides to Division 5.2;~~
- Part III: those relating to aerosols; desensitized explosives, flammable liquids, flammable solids, pyrophoric liquids and solids, substances which in contact with water emit flammable gases, oxidizing liquids and solids, unstable gases and gas mixtures, substances corrosive to metals and substances, and articles of transport Class 9 (ammonium nitrate fertilizers, lithium metal and lithium ion batteries);
- Part IV: test methods concerning transport equipment
- Part V: classification procedures, test methods and criteria relating to other sectors than transport.

~~Part III contains some classification procedures, test methods and criteria which are also given in the Model Regulations.~~

1.3.2 There are also ~~a number of~~ appendices which give information common to a number of different types of tests, on the National Contacts for Test Details, on an example method for emergency relief vent sizing of portable tanks for ~~the transport of~~ organic peroxides and self-reactive substances, ~~and~~ on screening procedures, on the HSL flash composition test for the classification of fireworks, response descriptors and the ballistic projection energy test for cartridges, small arms.

1.2.3.23 The methods of test identification are given in Table 1.42.

Table 1.42: TEST IDENTIFICATION CODES

Part of Manual	Test series	Test type	Test number	Example of test identification code
I	1 - 8	(a), (b), etc.	(i), (ii), etc. ^a	2 (a) (i)
II	A - H	-	1, 2, etc.	A.1
III	L - T	-	1, 2, etc.	L.1

^a If only one test is given for a test type, the Roman numerals are not used.

1.2.3.3,4 Each test is given a unique identification code and is edited as follows:

- x.1 Introduction
- x.2 Apparatus and materials
- x.3 Procedure (including observations to be made and data to be collected)
- x.4 Test criteria and method of assessing results
- x.5 Examples of results

NOTE: Examples of results are not normally given for tests on articles as these are too specific to the article tested and do not allow validation of the test procedure. Results on ~~substances-test samples~~ may vary from those given in the "Examples of results" if the physical form, composition, purity etc. of the ~~substance-test sample~~ is different. The results given should not be regarded as standard values.

Figures x.1, x.2, x.3 etc. (i.e. diagrams of apparatus etc.)

NOTE: Unless otherwise indicated, the dimensions given on the diagrams are in millimetres.

~~1.3 Precedence of hazard characteristics~~

~~1.3.1 The table in 2.0.3.3 of Chapter 2.0 of the Model Regulations may be used as a guide in determining the class of a substance, mixture or solution having more than one risk, when it is not named in the Dangerous Goods List in Chapter 3.2 of the Model Regulations. For goods having multiple risks, which are not specifically listed by name in Chapter 3.2 of the Model Regulations, the most stringent packing group denoted to the respective hazard of the goods takes precedence over other packing groups, irrespective of the precedence of hazard table in 2.0.3.3 of Chapter 2.0 of the Model Regulations.~~

~~1.3.2 The precedence of hazard characteristics of the following are not dealt with in the Precedence of Hazard Table in Chapter 2.0 of the Model Regulations, since these primary characteristics always take precedence:~~

- ~~Substances and articles of Class 1;~~
- ~~Gases of Class 2;~~
- ~~Liquid desensitized explosives of Class 3;~~
- ~~Self reactive substances and solid desensitized explosives of Division 4.1;~~
- ~~Pyrophoric substances of Division 4.2;~~
- ~~Substances of Division 5.2;~~
- ~~Substances of Division 6.1 with a packing group I inhalation toxicity;~~
- ~~Substances of Division 6.2; and~~
- ~~Material of Class 7.~~

~~1.3.3 Self reactive substances, except for type G, giving a positive result in the self heating test for Division 4.2, should not be classified in Division 4.2 but in Division 4.1 (see paragraph 2.4.2.3.1.1 of the Model Regulations); Organic peroxides of type G having properties of another class or division (e.g. UN 3149) should be classified according to the requirements of that class or division.~~

1.4 Safety

1.4.1 For the safety of laboratory personnel, the producer or other applicant for classification of a new product should provide all available safety data on the product e.g. the toxicity data [\(see Chapter 1.5 and Annex 4 of the GHS for guidance on the preparation of Safety Data Sheets\)](#).

1.4.2 Particularly when explosive properties are suspected, it is essential for the safety of workers that small scale preliminary tests are carried out before attempting to handle larger quantities. This involves tests for determining the sensitiveness of the substance to mechanical stimuli (impact and friction), and to heat and flame.

1.4.3 In tests involving initiation of potentially explosive substances or articles, a safe waiting period, prescribed by the test agency, should be observed after initiation.

1.4.4 Extra care should be taken when handling samples which have been tested since changes may have occurred rendering the substance more sensitive or unstable. Tested samples should be destroyed as soon as possible after the test.

1.5 General conditions for testing

1.5.1 The conditions given in the test prescriptions should be followed as closely as possible. If a parameter is not specified in the test prescription then the conditions given here should be applied. Where tolerances are not specified in the test prescription, it is implied that the accuracy is according to the number of decimal places given in any dimension e.g. 1.1 implies 1.05 to 1.15. In cases where conditions during a test deviate from those prescribed, the reason for the deviation should be stated in the report.

1.5.2 The composition of the test sample should be as close as possible to the concentration of the substance [in its intended use for transport](#). The contents of active substance(s) and diluent(s) should be specified in the test report

with at least an accuracy of ± 2 % by mass. Components which can have a major effect on a test result, such as moisture, should be specified as accurately as possible in the test report.

1.5.3 If, for example, for the purposes of supply or transport, the same substance or mixture is to be presented in a physical form different from that which was tested and which is considered likely to materially alter its performance in a classification test, the substance or mixture must also be tested in the new form.

1.5.4 All test materials in contact with the test substance should be such that, as far as possible, they do not affect the test results e.g. catalyse decomposition. In cases where such an effect cannot be excluded, special precautions should be taken to prevent the result being affected, e.g. passivation. The precautions taken should be specified in the test report.

1.5.45 The tests should be performed under the conditions (temperature, density etc.) which are representative of the expected circumstances ~~of transport~~. If these ~~circumstances~~ ~~transport conditions~~ are not covered by the test conditions specified, supplementary tests may need to be performed which are specifically designed for the anticipated ~~transport~~ conditions e.g. elevated temperature. Where appropriate, e.g. when the result is particle size dependent, the physical conditions should be specified in the test report.

1.6 Recommended tests

1.6.1 The Manual gives descriptions of tests and criteria used to provide the necessary information to arrive at a proper classification. In some cases, there is more than one test for a particular property. As a result of comparative work with some of these tests, it has been possible to identify one test as the recommended test in a set of equivalent tests. The recommended tests for classifying explosive substances and articles (Part I of the Manual) are listed in Table 1.2-3 and for classifying self-reactive substances and organic peroxides (Part II of the Manual) in Table 1.34. Unless otherwise specified, all test methods given in Part III of the Manual are recommended tests as only one test is given for each property. The other tests in a set are considered to be alternative tests and may continue to be used for classification purposes.

1.6.2 As a result of comparative work, some tests have been deleted. However, as some countries maintain databases referenced by the test number, the tests currently given in the Manual have not been renumbered unless existing tests have been assigned to different test types.

1.6.3 The aim is to have only one United Nations test, or combination of tests, for each property. However, until the recommended tests have been used more widely, it is not possible to do this in all cases at present.

Comment [Ed7]: is this still true ?

1.6.4 If new tests are proposed for inclusion in the Manual, the proposer should be able to provide justification that the new test is a significant improvement on the existing recommended test. In such cases, the new test may be included as an alternative test until it has been tried by laboratories of other countries.

Table 1.23: RECOMMENDED TESTS ~~FOR EXPLOSIVES AND EXPLOSIVE ARTICLES~~ in Part I

Test series	Test type	Test code	Test name
1	(a)	1 (a)	UN gap test
1	(b)	1 (b)	Koenen test
1	(c)	1 (c) (i)	Time / pressure test
2	(a)	2 (a)	UN gap test
2	(b)	2 (b)	Koenen test
2	(c)	2 (c) (i)	Time / pressure test
3	(a)	3 (a) (ii)	BAM Fallhammer
3	(b)	3 (b) (i)	BAM Friction apparatus
3	(c)	3 (c)	Thermal stability test at 75 °C

Test series	Test type	Test code	Test name
3	(d)	3 (d)	Small-scale burning test
4	(a)	4 (a)	Thermal stability test for unpackaged articles and packaged articles
4	(b)	4 (b) (i)	Steel tube drop test for liquids
4	(b)	4 (b) (ii)	Twelve metre drop test for unpackaged articles, packaged articles and packaged substances
5	(a)	5 (a)	Cap sensitivity test
5	(b)	5 (b) (ii)	USA DDT test
5	(c)	5 (c)	External fire test for Division 1.5
6	(a)	6 (a)	Single package test
6	(b)	6 (b)	Stack test
6	(c)	6 (c)	External fire (bonfire) test
6	(d)	6 (d)	Unconfined package test
7	(a)	7 (a)	EIS cap test
7	(b)	7 (b)	EIS gap test
7	(c)	7 (c) (ii)	Friability test
7	(d)	7 (d) (i)	EIS bullet impact test
7	(e)	7 (e)	EIS external fire test
7	(f)	7 (f)	EIS slow cook-off test
7	(g)	7 (g)	1.6 article external fire test
7	(h)	7 (h)	1.6 article slow cook-off test
7	(j)	7 (j)	1.6 article bullet impact test
7	(k)	7 (k)	1.6 article stack test
8	(a)	8 (a)	Thermal stability test for ANE
8	(b)	8 (b)	ANE gap test
8	(c)	8 (c)	Koenen test
8	(d)	8 (d)	Vented pipe tests ^a

Comment [Ed8]: one of the two tests should be mentioned

^a These tests are intended for evaluating the suitability for ~~transport~~ packaging in portable tanks.

Table 1.34: RECOMMENDED TESTS FOR SELF-REACTIVE SUBSTANCES AND ORGANIC PEROXIDES in Part II

Test series	Test code	Test name
A	A.6	UN detonation test
B	B.1	Detonation test in package
C	C.1	Time/pressure test
C	C.2	Deflagration test
D	D.1	Deflagration test in the package
E	E.1	Koenen test
E	E.2	Dutch pressure vessel test
F	F.4	Modified Trauzl test
G	G.1	Thermal explosion test in package
H	H.1	United States SADT test (for packages)
H	H.2	Adiabatic storage test (for packages, IBCs and tanks)
H	H.4	Heat accumulation storage test (for packages, IBCs and small tanks)

1.7 Reporting

1.7.1 Classifications for [inclusion in the list of dangerous goods for transport in](#) Chapter 3.2 of the Model Regulations are made on the basis of consideration of data submitted to the Committee by governments, intergovernmental organisations and other international organisations in the form recommended in Figure 1 of the Recommendations. Supplementary data is required for the classification of:

[Explosive s](#)Substances and articles ~~of Class 1~~ (see 10.5);
Self-reactive substances ~~of Division 4.1~~ (see 20.5); and
Organic peroxides ~~of Division 5.2~~ (see 20.5).

1.7.2 Where tests are performed on packaged substances or articles, the test report should contain the quantity of substance or number of articles per package and the type and construction of the packaging.
