

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 3 (b) of the provisional agenda

**Classification criteria and related hazard communication:
review of Chapter 2.1**

Report from the meeting on 3 July 2018 of the ICG on the review of Chapter 2.1 GHS

Submitted by the expert from Sweden

1. The ICG met after the joint session of the SCETDG/SCEGHS had ended. As the item had been presented at the joint session there was no need to reintroduce papers or the work as such. However, parts of the presentation were revisited and clarified, in particular regarding the relation between Divisions and Categories. It was stressed that a classification of an explosive where a Division can be assigned would consist of three layers - a Division, a Category and a Sub-category. Whenever an explosive is in a transport packaging or configuration the Division would be the relevant layer of classification, while Categories and Sub-categories would be the relevant classification layers for explosives not in the transport packaging or configuration. It was observed that using the same hazard statement for Sub-categories 2B and 2C would lead to very similar labelling on single packages, and that a projection hazard perhaps will not exist for Sub-category 2C depending on the final criteria.
2. The group thereafter focused their attention on finding a suitable hazard statement for Category 1. One member pointed out that safety information would be lost for the currently termed Unstable explosives within Category 1 if “Explosive” was chosen as the hazard statement, while many others seemed to feel that “Explosive” would be an adequate hazard statement as Category 1 would comprise the entire span from low hazard to very high hazard explosives. The option of using a flexible hazard statement was brought up, e.g. “Explosive [*state if mechanically sensitive or thermally unstable*]”, as well as an idea to instead let competent authorities prescribe the hazard information to be given. While the idea of splitting Category 1 up into two sub-categories with separate hazard statements was again raised by one member, many others were not in favour of this approach. There were also concerns from one member as regard the assignment of all explosives not packaged for transport to Category 1, in particular with regard to substances/mixtures with unintended explosive properties.
3. How to give information on the Division on the GHS label was the next topic that was discussed. While previous discussions had pointed to a Precautionary statement as the way forward (e.g. “Division 1.X as originally packaged/configured for transport.”), it was felt by some that this would not guarantee that the phrase appears on the GHS label, as the application of Precautionary statements may be non-prescriptive in implementations of the GHS at least when it comes to individual statements. As an alternative approach, the idea of using mandatory Supplemental information as a means to ensure that text informing on Divisions appears on the GHS label will be explored as a potential way forward. Whatever solution is found, it was pointed out that clarity is needed in how the text is to be applied.

4. The group also discussed briefly the potential unintended downstream effects of the amended classification system, and one member stressed that keeping the Divisions clearly visible and preferably on top in the hierarchy of the system would help in preventing problems in relation to permits, as they are usually referring to the Divisions. The importance of being clear on the relation of the Divisions *vis-à-vis* the Categories in any amended Chapter 2.1 was stressed, as well as the presentation of the labelling table(s) in the chapter. Finally there was consensus that it would not be possible to finalise all the remaining work within the current biennium, but that an attempt would be made to conclude on the criteria at the next UN-sessions in December 2018.
