

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**

Comment to UN/SCEGHS/39/INF.22 – A (simple) fall back option for decision logic 2.1 (b) of new GHS Chapter 2.1

Transmitted by the expert from Sweden

1. In document UN/SCEGHS/39/INF.22, the expert from Germany proposes a few changes to the decision logic flowcharts for the new GHS Chapter 2.1 as presented in document ST/SG/AC.10/C.4/2020/18. The expert from Sweden understands the reasons for the proposed amendments, but believes that in particular the change to decision logic 2.1 (b) could give rise to some discussion as it entails some altered wording and a potential re-ordering of the criteria in section 2.1.2 of the new GHS Chapter 2.1. While not intending to prevent that discussion or preclude the outcome, the expert from Sweden is mindful of the limited time available and the special meeting circumstances. He therefore offers a fall back option to solve the issue pointed to in a simpler, albeit perhaps less elegant, way.

2. In paragraph 7 of UN/SCEGHS/39/INF.22, it is explained that the desired effect of shifting the order of boxes in decision logic 2.1 (b) is to prevent a classifier from having to dig out test reports when attenuating features of the configuration at hand already indicate an intention to mitigate a “high hazard event”. The expert from Sweden has much sympathy for this view and realises that tracing back test data may provide quite a challenge for classifiers and thus should be avoided wherever not needed. Furthermore, some explosives (in particular pyrotechnic articles) are classified on basis of analogy rather than testing, so there are no test results available. If a conclusion can be drawn regarding the classification of a particular explosive on basis of attenuating features of the configuration, this should indeed be possible.

3. If changing the order of the boxes for decision logic 2.1 (b), and possibly also the order of the corresponding criteria, as proposed in UN/SCEGHS/39/INF.22 becomes too much of a challenge, the expert from Sweden proposes as a fall back option to instead add a sentence (or perhaps two) to the already existing footnote to Box 4A. While text is offered in the below, he understands that it may not be optimal and is open to discuss refinement of it.

Proposal

4. Keep the order of boxes in decision logic 2.1 (b) as in ST/SG/AC.10/C.4/2020/18 and expand existing footnote “a” to Box 4A to read (new text in bold underlined font, text in square brackets could be added if deemed necessary):

“In the absence of results from test 6 (a) or 6 (b), results from test 6 (d) may be used to assess whether there was a high hazard event, see 2.1.2.1. **Attenuating features in the configuration indicate that they could be intended to mitigate a high hazard event, on basis of which classification as Sub-category 2A may be assumed. [Expert knowledge could be needed to make this assessment.]**”