

**COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS**

**(Twenty-first session, 4-13 December 2000
agenda item 4.a) (iii))**

United Nations/ILO Working Group on the Harmonisation of the
Classification Criteria for Physical Hazards (aerosols)

Information paper transmitted from the European Aerosol Federation (FEA)

For the twenty-first session of the Committee of Experts (Geneva, 4-13 December 2000), the European Aerosol Federation submitted a proposal for Harmonisation of Classification Criteria for Physical Hazards of aerosols (UN-ST/SG/AC.10/2000/23).

FEA has observed in its own discussions, meetings with CSMA and during the United Nations/ILO Working Group meetings how difficult it is to separate hazard classification from labelling issues. FEA also accepts that while this Working Group is concerned with the harmonised classification of physical hazard, inevitably some consideration of the resultant labelling is required.

FEA therefore offers this information paper in an attempt to clarify the discussion and to assist the interpreters as the conversation moves between 'hazard', (or 'danger') and 'risk', since these are almost synonymous in some languages.

In this all its proposals, FEA has distinguished between the intrinsic physical hazard of aerosols and the risk to man or the environment of that hazard in a practical situation. The FEA's approach to risk communication and the determination of risk criteria was briefly defined in the proposal.

UN-ST/SG/AC.10/2000/23. This information paper is meant intended to elaborate on risk communication with particular reference to regarding aerosols.

FEA considers the work in progress with the ILO Working Group for "The Harmonisation of Chemical Hazard Communication" of great relevance for aerosol classification and subsequent labelling. FEA agrees with the approach in The "Step Two Part A - General Principles" document on General Principles (Towards Harmonisation of Chemical Hazard Communication in the Globally Harmonised System, March 2000) is in full agreement with the position FEA has on hazard and risk communication, particularly paragraph 15 on "Hazard and risk". This reflects Paragraph 21 of the IOMC Scope document and is has been FEA's basis of for hazard classification and risk labelling:.

"The degree of a chemical's capacity to harm depends on the intrinsic properties i.e. its capacity to interfere with normal biological processes, and its capacity to burn, explode, corrode etc. The concept of risk or the likelihood of harm occurring, and subsequent communication of that information, is introduced when exposure is considered in conjunction with the data regarding potential hazards. The basic approach to risk assessment therefore is the simple formula:

$$\text{Hazard} \times \text{Exposure} = \text{Risk}$$

Thus, if you can minimise either hazard or exposure, you minimise the risk or likelihood of harm. Successful hazard communication alerts the user to the presence of a hazard and the need to minimise exposures and the resulting risks."

FEA furthermore agrees with the ILO HCHC WG that risk based labelling can not be used is not appropriate for workplaces, transport and emergency responders, where labelling should be based on intrinsic hazard, but is appropriate only in respect of consumer education and communication. For the consumer the label is likely to be the sole source of information. It needs therefore to be sufficiently detailed and relevant to the use of the product in order for the consumer to use the appropriate amount of caution. The information provided should be simple and easy understandable. This is referred to in paragraph 45 of the ILO Working Group "Step Two Part B - Labelling - Options" document issued in March 2000.

FEA hopes this information helps to clarify the discussion on hazard classification and risk labelling and that it proves of assistance to the interpreters.

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