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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

Sub-Committee of Experts on the Transport of Dangerous Goods

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Miscellaneous

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

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Item 2 (a) of the provisional agenda

Work on the Globally Harmonized System of Classification and Labelling of Chemicals

Corrections and amendments to the Model Regulations, the Globally Harmonized System and the Manual of Tests and Criteria

Transmitted by the Australasian Explosives Industry Safety Group Inc. $(AEISG)^*$

I. Background

- 1. Following extensive use of the Model Regulations for the Transport of Dangerous Goods (Rev.23), the Globally Harmonized System of Classification and Labelling of Chemicals (GHS, Rev.10) and the Manual of Tests and Criteria (Rev.8) by AEISG and its member companies, several relatively minor issues have been identified for potential correction.
- 2. AEISG considers these primarily ensue from typographical errors, updated requirements or misunderstandings. AEISG is therefore listing the issues for consideration by the TDG and GHS sub-committees, as relevant, to confirm, or otherwise, the need for amendment or correction as appropriate.

II. Issues and proposed corrections

Model Regulations, chapter 2.1

3. In paragraph 2.1.3.2.2, the reference to '... grouped into **seven** series as listed ...' should read '... grouped into **eight** series as listed ...'.



^{*} A/78/6 (Sect. 20), table 20.5.

Correction

4. In chapter 2.1, paragraph 2.1.3.2.2 replace seven series by eight series

Globally Harmonized System, chapter 2.8, definition of self-reactive substances or mixtures

5. Paragraph 2.8.1.1 provides the definition for self-reactive substances or mixtures. However, the second sentence of this definition is unfinished. It should perhaps end with '... as explosives, organic peroxides or oxidizing **liquids or solids**.' This would maintain consistency with paragraph 2.8.2.1 (b).

Correction

6. In chapter 2.8, paragraph 2.8.1.1, at the end of the paragraph, *for* or as oxidizing *read* or as oxidizing liquids or solids.

Manual of Tests and Criteria

Section 11

7. Paragraph 11.1.1 currently reads:

'The question "**Is it an explosive substance**?" (Box 5 of Figure 10.2) is answered on the basis of the results of three types of tests to assess possible explosive effects. The question in Box 5 is answered "yes" if a "+" is obtained in any of the three types of test.'

8. For consistency with figure 10.2, the paragraph should read:

'The question "**Does it have explosive properties**?" (Box 5 of Figure 10.2) is answered on the basis of the results of three types of tests to assess possible explosive effects. The question in Box 5 is answered "yes" if a "+" is obtained in any of the three types of test.'

Correction

9. In section 11, paragraph 11.1.1 *for* Is it an explosive substance? *read* Does it have explosive properties?.

Section 12

10. Paragraph 12.1.1 currently reads:

'The question "Is the substance too insensitive for inclusion in the class of explosives?" (box 7 of Figure 10.2) is answered on the basis of three types of tests to assess possible explosive effects. The question in **box 6** is answered "no" if a "+" is obtained in any of the three types of test.'

11. For consistency with figure 10.2, the paragraph should read:

'The question "Is it too insensitive for acceptance into this class?" (box 7 of Figure 10.2) is answered on the basis of three types of tests to assess possible explosive effects. The question in **box 7** is answered "no" if a "+" is obtained in any of the three types of test.'

Correction

12. In section 12, paragraph 12.1.1 *for* Is the substance too insensitive for inclusion in the class of explosives? *read* Is it too insensitive for acceptance into this class?

Section 16

13. In 16.6.1.4.6 the reference '(see Box 32 of Figure 10.3)' should be '(see boxes **32** to **37** of Figure 10.3)'.

Correction

14. Section 16, paragraph 16.6.1.4.6, *replace* (see Box 32 of figure 10.3) *by* (see boxes 32 to 37 of figure 10.3).

Section 32

15. In paragraph 32.3.2.1, the reference '(see paragraph 2.3.1.4 of the Model Regulations and **note 2 to paragraph 2.1.1** of the GHS)' needs to be corrected as note 2 to paragraph 2.1.1 of the GHS appears irrelevant. Perhaps it should be '(see paragraphs 2.3.1.4 of the Model Regulations and **2.17.1.2** (b) of the GHS)'.

Correction

16. In section 32, paragraph 32.3.2.1, *for* (see paragraph 2.3.1.4 of the Model Regulations and note 2 to paragraph 2.1.1 of the GHS) *read* (see paragraphs 2.3.1.4 of the Model Regulations and 2.17.1.2 (b) of the GHS)

Section 33

17. In section 33, paragraph 33.3.1, the reference '(see **sub-section 2.4.2.4 of the Model Regulations and note 2 to paragraph 2.1.2.2** of the GHS)' needs to be corrected as the current note 2 to paragraph 2.1.2.2 of the GHS appears irrelevant. Perhaps it should be '(see subsection 2.4.2.4 of the Model Regulations and **2.17.1.2(a)** of the GHS).'

Correction

18. In section 33, paragraph 33.3.1, *for* and note 2 to paragraph 2.1.2.2 of the GHS) *read* (and paragraph 2.17.1.2 (a) of the GHS)

III. Proposed editorial amendment to the Manual of Tests and Criteria

Reference to UN Gap tests

- 19. There are three UN Gap tests included in the Manual of Tests and Criteria:
 - Test 1 (a) (Section 11)
 - Test 2 (a) (Section 12)
 - Test A.5 (Section 21)
- 20. These three tests are different in procedure, design and criteria. AEISG is of the view that these tests should be distinguishable perhaps by simple name additions e.g., UN Gap test 1, UN Gap test 2, UN Gap test A.5 so that potential confusion could be minimized.

Proposal

- 21. Amend the current references to the UN GAP test as follows:
 - In section 11:
 - Table 11.1, column "Name of test": replace "UN gap test" by "UN gap test 1"
 - 11.4.1, heading: replace "UN gap test" by "UN gap test 1"
 - Figure 11.4.1.1, heading: replace "UN gap test" by "UN gap test 1"
 - In section 12:
 - Table 12.1, column "Name of test": replace "UN gap test" by "UN gap test 2"
 - 12.4.1, heading: replace "UN gap test" by "UN gap test 2"
 - Figure 12.4.1.1, heading: replace "UN gap test" by "UN gap test 2"

- In section 21:
 - Table 21.1, column "Name of test": replace "UN gap test" by "UN gap test A.5"
 - 21.4.2, heading: replace "UN gap test" by "UN gap test A.5"
 - Figure 21.4.2.1: replace "UN gap test" by "UN gap test A.5"

Consequential amendments:

- Section 1, table 1.3:
 - Row for test series 1, test type (a), under "test name": replace "UN gap test" by "UN gap test 1"
 - Row for test series 2, test type (a), under "test name": replace "UN gap test" by "UN gap test 2"
- Section 10, figure 10.7 (a):
 - Line 5.1: replace "UN gap test" by "UN gap test 1"
 - Line 7.1: replace "UN gap test" by "UN gap test 2"
- Amend accordingly the references to UN gap tests in the table of contents of parts I (sections 11 and 12) and II (section 21).