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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
(Twenty-first session, 1-10 July 2002,
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Sub-Committee of Experts on the
Globally Harmonized System of
Classification and Labelling of Chemicals
(Third session, 10-12 July 2002, agenda item 2)

CLASSIFICATION AND LABELLING OF CHEMICALS

Classification criteria for aerosols

Comments on ST/SG/AC.10/C.3/2002/48 (Secretariat)

Transmitted by the Expert from Sweden

Introduction

Sweden fully supports the idea of globally harmonized classification criteria for aerosols and is grateful to the secretariat for having prepared the proposal of amendments to the Manual of tests and Criteria for this purpose. The expert from Sweden would nevertheless like to propose some amendments of essentially editorial nature to further improve upon the text, in particular supplement the wording in 31.3.4 regarding foam aerosols to give the criteria for flammable and non-flammable foam aerosol presently only found in figure 31.3.

Proposals

1. In 31.3.3 a number of standards are listed. If the intention is that any one of them could be used to determine the heat of combustion the text should read “ ... following one of the methods ...”
2. Replace the text in 31.3.4 with a text laid out in the same way as in 31.3.2 for spray aerosols keeping existing text under (a) and add new text about flammable/non-flammable under (b) as follows:

” 31.3.4 In the case of foam aerosols, the classification shall be made on the basis of the results of the foam flammability test (see sub-section 31.6 of this Manual), as follows
 - (a) The aerosol product is classified as extremely flammable if:
 - (i) The flame height is 20 cm or more and the flame duration is 2 s or more; or
 - (ii) The flame height is 4 cm or more and the flame duration is 7 s or more;
 - (b) The aerosol product is classified as non-flammable if the flame height is less than 4 cm or the flame duration is less than 2 s; otherwise the aerosol is classified as flammable.”
3. For “foam test” better use “foam flammability test” as in the headline of 31.6 throughout, i.e. in 31.3.4 (see text above), in two boxes in figure 31.3 (“In the foam flammability test, is”)

4. In the boxes in figure 31.1 giving the criteria, the word "and" is underlined to make it very clear that there are two conditions to be fulfilled simultaneously. The proposal is to have the same helpful signalling also for "and" in last box in figure 31.3 and expand it to cover "or" in the last box in figure 31.2 and the first box in figure 31.3 also.

Comment

It has been suggested that the Manual of tests and Criteria should be updated with this new section 31 as soon as possible and Sweden share this view. However, until the new flash point criteria for flammable liquids for Class 3 (the upper limit raised to 93 °C) have been fully introduced we are afraid this could cause some confusion. The question has also been asked whether this raised limit will have any influence on the classification as such for aerosols, but it will most certainly lead to more extensive testing.
