

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

30 November 2016

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Item 2 (g) of the provisional agenda

Classification criteria and related hazard communication:

Miscellaneous

Comments on the proposal for a new chapter for chemicals under pressure (UN/SCEGHS/32/INF.26)

Transmitted by the European Aerosol Federation (FEA)

1. CEFIC/EIGA have proposed two routes to deal with Chemicals under pressure under GHS: a new chapter or a combined one with aerosols.
2. *Aerosols* are different products to *chemicals under pressure*. *Aerosols* are by definition non-refillable, have limited capacity and have a relatively low permitted maximum internal pressure. Further the can construction requirements, flammability classification scheme and criteria as well as labelling provisions are different to *chemicals under pressure*.
3. For that reason combining aerosols with chemicals under pressure in the same chapter will create confusion rather than clarification for both the authorities and the industry.
4. FEA suggests developing and adopting a separate new chapter on chemicals under pressure.
5. If such a new chapter is adopted, it will also be necessary to clarify that the new provisions on chemicals under pressure do not apply to aerosols and statement to that effect should be added to Note 2 of Chapter 2.3.