



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

Sixty-fourth session

Geneva, 24 June-3 July 2024

Item 10 (b) of the provisional agenda

Issues relating to the Globally Harmonized System of Classification and Labelling of Chemicals:

Simultaneous classification in physical hazards and
possible combination of hazards

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

Forty-sixth session

Geneva, 3-5 July 2024

Item 2 (b) of the provisional agenda

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

Simultaneous classification in physical hazards and
precedence of hazards

Aerosols – Alignment of special provision 63 with special provision 362

Transmitted by the European Aerosol Federation (FEA)*

I. Introduction

1. At its sixty-first session, the Sub-Committee of Experts on the Transport of Dangerous Goods (TDG Sub-Committee) recommended that special provision 63 be aligned with the text of special provision 362.
2. FEA submitted informal document INF.4 for the sixty-third session of the TDG Sub-Committee and the forty-fifth session of the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (GHS Sub-Committee).
3. The updated proposal below has been prepared in cooperation with the Household and Commercial Products Association (HCPA) of the United States of America.

II. Discussion

4. At the last TDG and GHS sessions, experts supported the proposal to amend special provision 63. Concerning the proposed sub-item (h) in informal document INF.4, it was noted that similar provisions already existed in 2.2.2 and 2.2.4 of the *Model Regulations* and, therefore, preferred not to repeat them. Consequently, the proposed provisions from sub-item (h) have not been retained in the updated proposal.
5. The proposal for clarifications on the combinations of aerosols and chemicals under pressure with other hazard classes in the GHS transmitted by the expert from Germany on

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



behalf of the informal working group on combinations of physical hazards (document ST/SG/AC.10/C.3/2024/4–ST/SG/AC.10/C.4/2024/1) deletes the Note 1 – *Flammable components do not cover pyrophoric, self-heating or water-reactive substances and mixtures because such components are never used as aerosol contents* – under Table 2.3.1 in Chapter 2.3 of the GHS for aerosols, because considered irrelevant. Consequently, FEA proposes to delete the sentence “This designation does not cover pyrophoric, self-heating or water-reactive substances”. In the definition of flammable components in the last paragraph of special provision 63 as well as in the Manual of Test and Criteria, Section 31, paragraph 31.1.3.

III. Proposal for the Model Regulations

6. FEA proposes to amend special provision 63 in the *Model Regulations* as follows (new text is shown **bold, underlined**, deleted text is marked as ~~strikethrough~~):

“The division of Class 2 and the subsidiary hazards depend on the nature of the contents of the aerosol dispenser. The following provisions shall apply:

(a) Division 2.1 applies if the contents include 85 % by mass or more flammable components and the chemical heat of combustion is 30 kJ/g or more;

(b) Division 2.2 applies if the contents contain 1 % by mass or less flammable components and the heat of combustion is less than 20 kJ/g;

(c) Otherwise the product shall be classified as tested by the tests described in the *Manual of Tests and Criteria*, part III, section 31. Extremely flammable and flammable aerosols shall be classified in Division 2.1; non-flammable in Division 2.2;

(d) Gases of Division 2.3 shall not be used as a propellant in an aerosol dispenser;

(e) Where the contents other than the propellant of aerosol dispensers to be ejected are classified as Division 6.1 packing groups II or III or Class 8 packing groups II or III, the aerosol shall have a subsidiary hazard of Division 6.1 or Class 8;

(f) Aerosols ~~with contents~~ **additionally** meeting the **assignment** criteria for **Division 6.1**, packing group I for toxicity or **Class 8, packing group I** corrosivity shall be prohibited from transport;

(g) **Aerosols additionally meeting the classification criteria of Class 1, explosives; Class 3, liquid desensitized explosives; Division 4.1, self-reactive substances and solid desensitized explosives; Division 4.2, substances liable to spontaneous combustion; Division 4.3, substances which, in contact with water, emit flammable gases; Division 5.2, organic peroxides; Division 6.2, infectious substances; or Class 7, radioactive material, shall be prohibited from transport;**

(h) Subsidiary hazard labels may be required for air transport.

Flammable components are flammable liquids, flammable solids or flammable gases and gas mixtures as defined in notes 1 to 3 of sub-section 31.1.3 of part III of the *Manual of Tests and Criteria*. ~~This designation does not cover pyrophoric, self-heating or water-reactive substances.~~ The chemical heat of combustion shall be determined by one of the following methods ASTM D 240, ISO/FDIS 13943: 1999 (E/F) 86.1 to 86.3 or NFPA 30B.”

IV. Proposal for the Manual of Test and Criteria

7. FEA proposes to amend the definition of flammable components under section 31, paragraph 31.1.3 in the *Manual of Tests and Criteria* as follows (new text is shown **bold, underlined**, deleted text is marked as ~~strikethrough~~):

“Flammable components are flammable liquids, flammable solids or flammable gases and gas mixtures. ~~This designation does not cover pyrophoric, self-heating or water-reactive substances.~~”
