UN/SCETDG/40/INF.29
UN/SCEGHS/22/INF.17

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

25 November 2011

Sub-Committee of Experts on the Transport of Dangerous Goods

Fortieth session

Geneva, 28 November – 7 December 2011

Item 9 (a) of the provisional agenda

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

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

Twenty-second session

Geneva, 7 – 9 December 2011

Item 4 (c) of the provisional agenda

Implementation of the GHS: Cooperation with other bodies or international organizations

Harmonization of classification criteria for transport with the classification criteria of the GHS for substances and mixtures corrosive to skin

Transmitted by ICPP (International Confederation of Plastics Packaging Manufacturers)

Background

1. The harmonization of the classification criteria for transport and for supply and use needs to be pushed forward to avoid confusion during transport, based on contradicting classifications and label information for substances and mixtures.

Introduction

2. The application of the GHS corrosivity criteria has the potential to lead to assignment to Packing Group I from Packing Group II or even Packing Group III for transport for class 8. This paper will highlight the downstream consequences for the packaging which will be used.

3. Intermediate Bulk Containers (IBCs) are generally not approved for the transport of PG I products, particularly, plastics composite IBCs (Type 31HA1). It has to be noted that the identified chemicals are often commodities transported in large quantities. The equipment for filling and emptying of those commodities is often designed for the use of composite IBCs.

4. The incident data documented and published by the US authorities show incident rates of 7 failures per million shipments for dangerous goods in type UN 31HA1 based on approximately 20 million shipments. Although any accident is preferably avoided, ICPP believes this accident rate is so small as to be a good indication that type 31HA1 IBCs can safely be used to transport these dangerous goods.

***Note**: The US transport data includes transport DAMAGE, not only failure of the packagings. We have reviewed these data as well and find that many reported incidents of failures of 31HA1 are the result of handling damage (fork lift punctures, unsecured cargo, etc) that are no fault of the integrity of the packagings.*

5. In addition to the above mentioned consequences the identified chemicals will be also excluded from the possibility to be transported in limited and accepted quantities.

Proposal

6. We support the position of ICCA, as stated in document UN/SCETDG/40/INF.9 to not harmonize TDG-list class 8 entries with CLP list classifications without an individual check of the consequences to transport conditions regarding safety benefit. There are significant downstream consequences without corresponding safety benefits.