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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(18th session, Geneva,
3 - 12- June 2000,
agenda item 6b)

GLOBAL HARMONISATION OF SYSTEMS OF CLASSIFICATION AND LABELLING OF CHEMICALS

Environmentally Hazardous Substances Comments to ST/SG/AC.10/C.3/2000/4 from Argentina

Transmitted by the Expert from Germany

1. The Expert from Argentina is proposing an amendment to the Data Sheet (Figure 1 in the UN Recommendations). He suggests to add a new section 9.
2. The Expert from Germany is supporting the general principle, but for editorial reasons proposes to insert the section to show test data and information about environmental hazards as section 6. It would then be closely related to all data about the hazardous properties of a substance or product, for which a new UN number may be required in future. Consequently existing sections 6 to 8 would be changed to sections 7 to 9.
3. An editorially amended proposal can be found in the Annex to this Inf. Paper. The Expert from Germany proposes that version for adoption by the Sub Committee.
4. The Expert from Germany is further suggesting to add Large Packagings to new section 7.2 as 7.2.3 (existing section 6.2) and to new section 8 as 8.2 (existing section 7). As Large Packagings are not permitted generally but for some groups of substances only in the Model Regulation, Governments or Industry Organisations presenting a Data Sheet for a new UN number should be permitted to indicate whether they want to propose Large Packagings for transport and, if yes, which type(s) of it.
5. The proposal from the Expert from Argentina to amend 2.9.2.8.3.9 to obligatory require testing of aquatic environmental hazard may at this stage of the debate be misleading and be too stringent, because the Model Regulation do not generally require competent authority classification but to a wide extent permit and encourage self classification by industry.
6. But it should be made clear that test data for environmental hazard should be presented, if relevant, in the Data Sheet for assigning a new UN number to a substance or product once criteria for this hazard have been included in the Model Regulation and the Manual of Tests and Criteria.

Figure 1 DATA SHEET TO BE SUBMITTED TO THE UNITED NATIONS FOR NEW OR AMENDED CLASSIFICATION OF SUBSTANCES

Section 6. Environmental Effects

6.1 Acute aquatic toxicity (2.9.2.2.3)

6.1.1 96 hour LC₅₀ (for fish).....mg/L Species

6.1.2 48 hour EC₅₀ (for crustacea).....mg/L Species

6.1.3 72 or 96 hour ErC₅₀
(for algae or other aquatic plants).....mg/L Species

6.2 Potential for or actual bioaccumulation (2.9.2.2.4)

6.2.1 BCF..... Species

6.2.2 log K_{OW}

6.3 Is the substance readily degradable ? (2.9.2.2.5 and 2.9.2.4) yes/no

6.3.1 If yes, give details.....

.....
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6.4 Chronic aquatic toxicity (2.9.2.2.6)

6.4.1 NOEC or L(E)C_x (for fish)mg/l Species

6.4.2 NOEC or L(E)C_x (for Daphnia).....mg/l Species

6.4.3 NOEC or L(E)C_x (for algae).....mg/l Species

Existing Section 6 to become new Section 7.

Existing Section 7 to become new Section 8.

Existing Section 8 to become new Section 9.
