

**Sub-Committee of Experts on the Globally  
Harmonized System of Classification  
and Labelling of Chemicals**  
(Fifth session, 7-9 July 2003,  
agenda item 4)

**THE GLOBALLY  
HARMONIZED SYSTEM OF CLASSIFICATION  
AND LABELLING OF CHEMICALS (ST/SG/AC.10/30)**

**Comments on the GHS**

**Submitted by the secretariat**

**AEROSOLS**

1. The term “aerosol” is used in the GHS with two different meanings. This needs to be clarified and harmonized.
2. In the context of physical hazards in Part 2, “aerosol” is understood as in transport of dangerous goods regulations, i.e. as aerosol dispensers and their ejected contents. It is defined in Chapter 2.3 on “flammable aerosols” as follows:

*“Aerosols, this means aerosol dispensers, are any non-refillable receptacles made of metal, glass or plastics and containing a gas compressed, liquefied or dissolved under pressure, with or without a liquid, paste or powder, and fitted with a release device allowing the contents to be ejected as solid or liquid particles in suspension in a gas, as a foam, paste or powder or in a liquid state or in a gaseous state”.*

3. The term “aerosol” is also found in Part 3 of the GHS text, but with a different meaning. In this context, aerosols are understood as substances (or mixtures) *per se* in their aerosolized status, and mentioned for their potential harm to health (toxicity, corrosion, irritation) through various pathways (mainly respiratory). In this case, it is only the sprayed form that is at stake, and not a paste or a foam. Aerosols are quoted in paras 3.1.3.5.7 of Chapter 3.1, 3.2.3.2.7 of Chapter 3.2, 3.3.3.2.7 of Chapter 3.3, 3.4.3.2.5 of Chapter 3.4, 3.8.3.3.7 of Chapter 3.8, 3.9.3.3.7 of Chapter 3.9. For instance, the text given in 3.1.3.5.7 is:

*“An aerosol form of a mixture may be classified in the same hazard category as the tested, non-aerosolized form of the mixture for oral and dermal toxicity provided the added propellant does not affect the toxicity of the mixture on spraying. Classification of aerosolized mixtures for inhalation toxicity should be considered separately.”*

4. In part 1 of the GHS, Chapter 1.2 Definitions and Abbreviations, there is a definition of aerosol. In principle all definitions given in Chapter 1.2 should be relevant to the entire text. However, the definition given there is fully in accordance with the TDG understanding, i.e:

*“Aerosols means any non-refillable receptacles made of metal, glass or plastics and containing a gas compressed, liquefied or dissolved under pressure, with or without a liquid, paste or powder, and fitted with a release device allowing the contents to be ejected as solid or liquid particles in suspension in a gas, as a foam, paste or powder or in a liquid state or in a gaseous state. Aerosol includes aerosol dispensers;”*

5. **Suggested solution**

Since the word aerosol is used with different meanings in various chapters of the GHS, the secretariat proposes to delete the definition in Chapter 1.2.

**SUBSTANCES**

6. The word “substances” appears in the titles of chapters 2.8 (self-reactive substances), 2.11 (Self-heating substances) and 2.12 (Substances which, in contact with water, emit flammable gases) while the classification criteria of the related hazard classes cover both substances and mixtures.

*Note: The problem is specific to the English text of the GHS, and does not concern the French text.*

7. The Sub-Committee may wish to consider whether the title should be amended to cover mixtures.

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