



Secretariat

Distr.
GENERAL

ST/SG/AC.10/C.4/2004/12
29 July 2004

ORIGINAL: ENGLISH

**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

Eighth session, 6-9 December 2004,
Item 2(a) of the provisional agenda

**UPDATING OF THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND
LABELLING OF CHEMICALS (GHS)**

Physical Hazards

Proposal for amendments to Chapter 2.1 (Explosives)

Transmitted by the expert from Norway

1. Introduction

At the 7th session in July 2004, the outcome of the Correspondence Group (CG) on Precautionary Statements was presented in document ST/SG/AC.10/C.4/2004/8.

During the discussions on the paper, Norway made some specific comments to the proposed introductory texts for the Explosives in the Table in A3.5. Norway was of the opinion that some improvements should be made in regard to the precautionary statement, and that some of the Signal Words, Hazard Statements and Symbols stated were not sufficient for consumer safety. The proposal for the precautionary statements has been taken up directly with the Chairman of the CG, but the problems with the Signal Words, Hazard Statements and Symbols had to be dealt with separately, since these were derived from the texts in Chapter 2.1 and in Annexes 1 and 2 of the GHS.

Norway would like to propose some changes, as a first step, both to the text in Table 2.1.2 in sub-Chapter 2.1.3 as well as to the table of label elements for Explosives in Annexes 1 and 2 to the GHS, and as a second step, Norway would like to initiate a general discussion on how to deal with the consumer labels for Explosives under the GHS (see 1.1.3.1.4 of the GHS).

2. Proposals

Any proposed new words in existing text is shown underlined.

- 2.1 In Table 2.1.2 of section 2.1.3, in the line for Signal word: in the column for Division 1.5, replace "Warning" with "Danger".
- 2.2 In Table 2.1.2 of sub-chapter 2.1.3, in the line for Hazard statement; in the column for Division 1.5, replace "May explode in fire" with "May mass explode in fire".
- 2.3 In Annex 1 "Allocation of Label Elements", in the table for Explosives, change the pictograms (texts) given for Divisions 1.4 and 1.5 into the same pictograms as the one used for the first three divisions.
- 2.4 In Annex 1 "Allocation of Label Elements", in the table for Explosives; under Division 1.5, replace "Warning" with "Danger" and "May explode in fire" with "May mass explode in fire".
- 2.5 In Annex 1 "Allocation of Label Elements", in the table for Explosives; Change the reference given in the shaded explanatory text given under the GHS part of the text to read "(see also par. 1.4.10.5.1)".
- 2.6 In Annex 2, Table A2.1: in the row of Division 1.4, replace the text in the box containing "1.4" with the exploding bomb symbol. In the row of Division 1.5, replace the text in the box containing "1.5" with the exploding bomb symbol and replace the signal word "Warning" with "Danger"; and insert in the hazard statement "mass" between "May" and "explode".

3. Justification

For 2.1, 2.2 and 2.4: Many of the products classified under Division 1.5 may also be classified under Division 1.1. The only difference is that the products classified under Division 1.5 should have been run through Test Series 5 of The Manual for Tests and Criteria to show that they are less sensitive than the products Classified under Division 1.1. The end result in a fire may nevertheless be a mass explosion, although the likelihood may be somewhat less for products in Division 1.5. Some of these products will also be used as packaged products, and be handled and stored at the workplace, outside of the transport legislations. They should thus have a signal word and hazard a statement that covers the ability to mass explode in a fire.

For 2.3: Explosives classified under Division 1.4 and 1.5 will be stored and handled as packaged products by workers/consumers. Regarding explosives under Division 1.5, these could, as stated above mass detonate in a fire, and the pictogram should reflect this possibility.

Regarding the explosives classified under 1.4, the classification given for transport will in most cases be dependant on the transport packaging. When used at the workplace or by the consumer, the possibility of an explosion will not be apparent by the present pictogram requirements. A particular problem in this respect is that there is no test series existing within the GHS today that can be used for the classification of such products outside the transport packaging. Even running the Test series 6 tests on unpackaged articles will not give information that will be coherent with the ability of certain small explosive article to e.g. actually blow your hand off! In Norway's opinion, there is a flaw in the GHS system as regards the consumer safety issue when it comes to explosives. The present system is based on the transport needs, and is working sufficiently well for its purpose, but does not work well when transferred to the workplace

and consumer safety regime. As a first step to rectify this situation, Norway is of the opinion that introducing the GHS pictogram also for these explosives will increase the understanding in workers and consumers of the inherent risk from these explosives. Norway nevertheless is of the opinion that the work on a future system for classification of explosives for workplace and consumer safety should be put on the work-plan for the GHS.

For 2.5: The reference given is incorrect. There is no 1.4.10.5.1 (d) (ii). Norway is not sure what the reference should be, but assumes that it is a reference to the instructions for use of GHS pictograms alongside the transport pictograms on the same label. This is covered in 1.4.10.5.1.

For 2.6: As a consequence from the changes proposed in 2.1 to 2.4, the text in Annex 2, Table A2.1 needs to be changed accordingly.
