

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

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ISSUES RELATING TO THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Implementation of the corrosivity criteria of GHS into Class 8 of the UN Recommendations on the Transport of Dangerous goods

Comments on ST/SG/AC.10/C.3/2008/48

Transmitted by the International Association of the Soap, Detergent and Maintenance Products Industry (AISE.)

Introduction

1. AISE. understands the general desire of the Government of the Netherlands to move towards modal and transport/use harmonisation, where appropriate and where hazard and risk are similar. However, it is important to avoid unnecessary extensions of transport regulation: for example where only exposure to substances in use situations is dangerous.
2. We therefore have concerns about the proposals in ST/SG/AC.10/C.3/2008/48, and offer some thoughts for further discussion.

Discussion

3. AISE. recalls that the GHS procedures were originally intended to be based on the TDG criteria, which have a long history of successful application, but it seems that GHS moved away from these.
4. We therefore invite the Sub-Committee to keep the Orange Book substantially as it is, but with the addition of *in vitro* testing using OECD 435 (and OECD 430 or 431 to negate classification) as provisionally adopted at the 32nd session (reference para 26 of the report ST/SG/AC.10/C.3/64 in respect of paper ST/SG/AC.10/C.3/2007/50 and INF.49). We should also like to make the following comments on other issues mentioned in the paper 2008/48:

- a) “Full thickness destruction of skin” (TDG) has never to our knowledge caused any problem of interpretation. “Response” (GHS), as ST/SG/AC.10/C.3/2008/48 states, is not very clear.
- b) pH alone is a notoriously bad predictor of corrosive effects. As laid down in GHS it frequently over-classifies substances which are not corrosive. This can give a false perception of danger leading to carelessness in handling genuinely dangerous goods. There also could be increased costs with no discernible benefit.
- c) There has never been a need identified to consider irritancy as a hazard in the transport of dangerous goods (as the potential for exposure is much less than when in use). As 2008/48 states, the criteria for skin corrosion and irritancy are intertwined in GHS. There would seem to be no benefit in complicating the text of the Orange Book by transposing this text from GHS. Indeed the UNSCEGHS at its 12th session re-affirmed that “not all the hazard classes in the GHS had to be implemented for a given sector” and inserted paragraph 1.1.3.1.5.4 to clarify this.

Conclusion

AISE. invites the Sub-Committee not to make sweeping changes to Chapter 2.8, other than the addition of *in vitro* testing. We hope that the Sub-Committee will now be able to simply fully adopt the modifications to 2.8.2.4 provisionally adopted in December 2007 as set out in Annex 1 to ST/SG/AC.10/C.3/C.3/64. However, A.I.S.E. would be pleased to prepare a paper for the December 2008 meeting formally proposing this adoption, if the Sub-Committee thinks this would be more appropriate.
