

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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Item 10 of the provisional agenda

**Issues relating to the Globally Harmonized System
of Classification and Labelling of Chemicals (GHS)**

Comments on document ST/SG/AC.10/C.3/2010/10: proposal for amendments to Chapter 2.8

**Transmitted by the International Association for Soaps, Detergents and
Maintenance Products (AISE)**

Introduction

1. A.I.S.E. has considerable concern about the revised proposal of the Netherlands to amend Chapter 2.8 to implement GHS alternative methods to allocate a packing group for skin corrosion (2.8.3). Only some of the submitted comments have been taken on board and the paper still seems to be trying to go further than the sentiments expressed during the meeting of the WG in December.

Discussion

2. The table in 2.8.3.1 showing the relationship between GHS sub-categories and packing groups is not a good basis for classification as was noted in the working group in December which recognized that different methods had been used for e.g. European legislation for supply and use. In reality these sub-categories make no difference to supply packaging, symbols, signal words, or hazard statements, while packing groups have great significance for transport requirements.

3. 2.8.3.2 correctly states that it is not possible to assign a packing group based on pH. The December working group felt that consideration of substances with an extreme pH value as corrosive without further testing was not correct and that this wording should be amended. A.I.S.E. supports the working group's statement and recommendation of amendment and feels that it would be inappropriate to introduce this paragraph into Chapter 2.8 at this time. In particular the last sentence, in square brackets, has no basis and should be deleted. There is no such reference in GHS Chapter 3.2.

4. A.I.S.E. further believes that the Table in 2.8.3.1 could create confusion for users (particularly those less experienced) carrying out classification for transport and that the remaining text should be sufficient. Our proposal is that this Table should be deleted.

Proposals

5. Delete the Table in 2.8.3.1.

In 2.8.3.2 Extreme pH delete: “Where results from *in vitro* or *in vivo* tests are available, a classification based on these results prevails over a classification based on pH. [If data are not available it is permitted to assign packing group I based on extreme pH.]”
