

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

2 November 2010

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Item 3 of the provisional agenda

Hazard communication

Comments on ST/SG/AC.10/C.4/2010/13: Consequential amendments to the note under paragraph 2.3.2.2

Transmitted by the expert from Sweden

Background

1. At the 19th session of the Sub-Committee, Sweden proposed in INF.11 a slight modification to the Note in paragraph 2.3.2.2 of Chapter 2.3 of the GHS (Flammable Aerosols). The new wording was proposed to be: “**NOTE:** *Aerosols not submitted to the flammability classification procedures in this Chapter should be classified as flammable aerosols, Category 1.*”

2. The Swedish informal proposal, which was only a clarification necessary for legal purposes, was adopted in principle by the Sub-Committee, and can therefore be found in document ST/SG/AC.10/C.4/2010/6 from the Secretariat submitted to the 20th session, for formal adoption.

3. The Federation of European Aerosol Associations (FEA) and the expert from the United Kingdom have submitted to the 20th session document ST/SG/AC.10/C.4/2010/13, with major changes to the hazard class “Flammable Aerosols”. One of these changes is the creation of a new hazard category for non-flammable aerosols (Category 3), which changes the scope of the hazard class to include all aerosols.

Problem

4. If the proposal from the FEA and UK is adopted by the Sub-Committee, the Note in paragraph 2.3.2.2 as adopted in principle at the 19th session, is no longer correct. In fact it would require the non-flammable aerosols in the new Category 3 to be classified as Category 1, unless subjected to flammability tests.

Proposal

5. If the proposal in document ST/SG/AC.10/C.4/2010/13 is adopted, amend the NOTE under 2.3.2.2 in Chapter 2.3, to read as follows (changes are indicated):

“NOTE: “Aerosols containing more than 1% flammable components or with a heat of combustion of at least 20 kJ/g, which are not submitted to the flammability classification procedures in this chapter, should be classified as Aerosols, Category 1.”

6. The Sub-Committee is invited to adopt the amendment in paragraph 5, to avoid over-classification of non-flammable aerosols not submitted to the flammability classification procedures in Chapter 2.3, in Category 1.

7. If adopted, the proposal in this document will supersede the amendment in ST/SG/AC.10/C.4/2010/6 applicable to the same text.
