

**Committee of Experts on the Transport of Dangerous Goods  
and on the Globally Harmonized System of Classification  
and Labelling of Chemicals**

25 November 2011

**Sub-Committee of Experts on the  
Transport of Dangerous Goods**

**Fortieth session**

Geneva, 28 November – 7 December 2011

Item 9 (a) of the provisional agenda

**Issues relating to the Globally Harmonized System  
of Classification and Labelling of Chemicals:**

**Corrosivity criteria**

**Sub-Committee of Experts on the Globally Harmonized  
System of Classification and Labelling of Chemicals**

**Twenty-second session**

Geneva, 7 – 9 December 2011

Item 4 (c) of the provisional agenda

**Implementation of the GHS:**

**Cooperation with other bodies or international  
organizations**

**Harmonization of classification criteria for transport  
with the classification criteria of the GHS for substances  
and mixtures corrosive to skin**

**Transmitted by ICPP (International Confederation of Plastics  
Packaging Manufacturers)**

**Background**

1. The harmonization of the classification criteria for transport and for supply and use needs to be pushed forward to avoid confusion during transport, based on contradicting classifications and label information for substances and mixtures.

**Introduction**

2. The application of the GHS corrosivity criteria has the potential to lead to assignment to Packing Group I from Packing Group II or even Packing Group III for transport for class 8. This paper will highlight the downstream consequences for the packaging which will be used.

3. Intermediate Bulk Containers (IBCs) are generally not approved for the transport of PG I products, particularly, plastics composite IBCs (Type 31HA1). It has to be noted that the identified chemicals are often commodities transported in large quantities. The equipment for filling and emptying of those commodities is often designed for the use of composite IBCs.

4. The incident data documented and published by the US authorities show incident rates of 7 failures per million shipments for dangerous goods in type UN 31HA1 based on approximately 20 million shipments. Although any accident is preferably avoided, ICPP believes this accident rate is so small as to be a good indication that type 31HA1 IBCs can safely be used to transport these dangerous goods.

*Note: The US transport data includes transport DAMAGE, not only failure of the packagings. We have reviewed these data as well and find that many reported incidents of failures of 31HA1 are the result of handling damage (fork lift punctures, unsecured cargo, etc) that are no fault of the integrity of the packagings.*

5. In addition to the above mentioned consequences the identified chemicals will be also excluded from the possibility to be transported in limited and accepted quantities.

## **Proposal**

6. We support the position of ICCA, as stated in document UN/SCETDG/40/INF.9 to not harmonize TDG-list class 8 entries with CLP list classifications without an individual check of the consequences to transport conditions regarding safety benefit. There are significant downstream consequences without corresponding safety benefits.

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