

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**

9 December 2011

Twenty-second session

Geneva, 7 (p.m) – 9 December 2011

Item 3 of the provisional agenda

Hazard communication issues

Report of the informal correspondence group on hazard communication for corrosive to metals

Transmitted by the International Association for Soaps, Detergents and Maintenance Products (AISE) on behalf of the informal correspondence group

The informal correspondence group on hazard communication for corrosive to metals met on 8 December 2011.

1. The correspondence group reviewed the options agreed in the conference call held on 30 Nov 2011 – option 3, option 5 and the proposed modifications, and option 6 (details in Annex 1 to INF.25).
2. During the earlier conference call, the participants agreed not to progress options 1, 2 and 4 (details in Annex 2 to INF. 25) as possible permanent solutions to address issues which may arise if the physical hazard ‘corrosive to metals’ is adopted for supply/use situations. The correspondence group confirmed that options 1 and 2 should not be progressed as possible permanent solutions. It was clarified that the current competent authority option in GHS 1.4.10.5.5 would remain in the text until a permanent solution is available.
3. As also agreed in the earlier conference call, feedback on options 3 and 4 was invited from the transport experts present (e.g. do they see an advantage to distinguish between the different types of corrosion?). Regarding option 3, some transport experts expressed concern about having separate pictograms for corrosion and the resultant impact on transport labelling. However, it was noted that option 3 could be adopted for the supply/use sector without any changes in transport. Concern was also expressed that splitting the corrosion pictogram for supply/use and introducing the change as a competent authority option could lead to disharmonisation.
4. Regarding option 5, several experts supported option 5b as a possible solution to address issues which may arise if the physical hazard ‘corrosive to metals’ is adopted for supply/use situations. Support for option 5a was divided and some reservations were expressed about:
 - (a) introducing an exemption based on a specific volume as proposed in option 5c; and
 - (b) the proposed volume of 5 litres.

5. It was identified that the final option will need to take account of the following concerns:

- (a) Pictogram should appear on the label;
- (b) No differentiation and no labelling differences between consumer and workplace;
- (c) Introduction of new pictograms;
- (d) No changes for transport;
- (e) Impact on harmonisation if the proposed solution is adopted as a competent authority option;
- (f) Level of protection not lowered.

6. The group agreed that option 3, option 5 and modifications, and option 6 should be worked up (i.e. develop possible text for inclusion in the GHS and identify any consequential changes) for further consideration by the group in early 2012.
