UN/SCETDG/44/INF.22
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Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

15 November 2013

Sub-Committee of Experts on the Transport of Dangerous Goods

Forty-fourth session

Geneva, 25 November – 4 December 2013

Item 10 (h) 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–sixth session

Geneva, 4 – 6 December 2013

Item 2 (c) of the provisional agenda

Classification criteria and hazard communication: corrosivity criteria

Comment on informal document INF.42 (TDG, 43rd session)– INF.11 (GHS, 25th session): Harmonisation of the GHS criteria for skin corrosion with the assignment of packing groups in the UN Model Regulations for the Transport of Dangerous Goods

Transmitted by the expert from Australia

Issue

1. Australia has undertaken a comprehensive review of the issue surrounding harmonisation of the GHS criteria for sub-categorisation of skin corrosivity with that provided in the UN Model Regulations for the Transport of Dangerous Goods (TDG Regulations).

2. In informal documents INF.42(TDG, 43rd session) – INF.11 (GHS, 25th session) the United Kingdom has summarised over six years of discussion to produce Options 1- 6, for the harmonisation of GHS and TDG Regulations in relation to this matter.

3. The TDG-GHS working group on corrosivity reported (ST/SG/AC.10/C.4/50 paragraphs 17-23), that Options 2, 5 and 6 had received support.

Comment

4. Australia understands the difficulties in classifying materials for transport using the sub-categories for skin corrosivity, as outlined most recently in INF.26 (TDG, 43rd session)– INF.9 (GHS, 25th session), transmitted by the European Chemical Industry Council (CEFIC). It is appreciated that over-classification to packing group I could lead to increases in costs associated with changes to packaging and downstream management of those materials as well as other difficulties. It is more concerning however that some materials currently classified as Packing Group I could be downgraded to Packing Group II or even Packing Group III, resulting in a reduction in safety.

5. As such, Australia supports the notion of Option 5, to decouple the assignment of packing groups in the TDG Regulations from the sub-categorisation of skin corrosivity in the GHS. However, Australia does not support the removal of sub-categories 1A, 1B and 1C from the GHS as this information is important for supply and use in determining the most appropriate workplace controls (i.e. selection of personal protective equipment). Option 5 is reproduced below.

"Option 5:

Adopt in transport GHS classification criteria, including alternative methods; no hazard sub-categories in both GHS and transport; assign packing group separately from transport classification

6. This option is shown diagrammatically in Table 5. Transport adopts the GHS criteria including alternative methods. There is no sub-division of hazard in Skin corrosion category 1 or Class 8. Packing Group is assigned separately from transport classification, and is based on whatever additional risk-based criteria the transport sector considers appropriate.

Table 5

<table>
<tr><td colspan="2"></td><td colspan="2">Hazard classification</td><td colspan="2"></td></tr>
<tr><td colspan="2">Classification criteria</td><td>GHS</td><td>Transport</td><td colspan="2">Transport conditions</td></tr>
<tr><td rowspan="3">Exposure ≤ 3 min
Observation ≤ 1 h

Exposure > 3 min ≤ 1 h
Observation ≤ 14 days

Exposure > 1 h ≤ 4 h
Observation ≤ 14 days</td><td rowspan="3">Alternative methods</td><td rowspan="3">Skin Corrosive 1</td><td rowspan="3">Class 8</td><td>PG I

PGII*

PGIII</td><td rowspan="3">Special packing provisions, limited and excepted quantities and downstream transport provisions</td></tr>
</table>

* *As a starting point it has been suggested PG II is assigned by default, unless there are reasons to justify PG I or PGIII. Criteria for assignment of PG will be hazard and risk based."*

Proposal

7. In considering the additional work required should this option be selected, the advantages and disadvantages, Australia proposes the amended Table 5 below and supporting comments. Amendments are shown in bold.

Table 5

<table>
<tr><td colspan="3">Classification criteria</td><td colspan="2">Hazard classification</td><td colspan="2"></td></tr>
<tr><td>Sub-category</td><td colspan="2"></td><td>GHS</td><td>Transport</td><td colspan="2">Transport conditions</td></tr>
<tr><td>1A</td><td>Exposure ≤ 3 min
Observation ≤ 1 h</td><td rowspan="3">Alternative methods</td><td rowspan="3">Skin Corrosive 1</td><td rowspan="3">Class 8
PGII</td><td rowspan="2">PG I</td><td rowspan="3">Special packing provisions, limited and excepted quantities and downstream transport provisions</td></tr>
<tr><td>1B</td><td>Exposure > 3 min ≤ 1 h
Observation ≤ 14 days</td></tr>
<tr><td>1C</td><td>Exposure > 1 h ≤ 4 h
Observation ≤ 14 days</td><td>PGIII</td></tr>
</table>

* *PG II is assigned by default, unless there are reasons to justify PG I or PGIII. Criteria for assignment of PG will be hazard and risk based.*

8. All chemicals currently classified as Class 8 under the TDG Regulations should retain their current packing group, irrespective of their classification in the GHS. This is due to the experience and history associated with the assignment of existing packing groups.

9. All new chemicals determined as corrosive under the GHS should automatically be assigned PGII until either experience or testing indicates a need to either upgrade or downgrade the packing group.

10. Advantages

- Consistent hazard-based classification for transport and supply
- The desired distribution of packing groups for transport is achieved, e.g. the criteria ensure Packing Group I applies only to substances/mixtures that pose a very high risk in transport.
- Adoption of the GHS criteria is simplified in both GHS and transport, avoiding complexities where alternative methods do not distinguish sub-categories.
- No effect on jurisdictions who have already adopted GHS sub-categories.
- No revision of Chapter 3.2 of the GHS required.
- No change to packing groups for chemicals already assigned to Class 8.

Summary

11. Australia supports in principle, Option 5, with the above recommended changes and would be encouraged by a resolution to this issue at the meeting on Tuesday 3 December.