

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**

4 December 2013

Twenty-sixth session

Geneva, 4 – 6 December 2013

Items 2 (a), (c) and (g), 3(d) and 4(c) of the provisional agenda

Work of the Sub-Committee of Experts on the Transport of Dangerous Goods on its 44th session

Note by the secretariat

Introduction

1. The Sub-Committee of Experts on the Transport of Dangerous Goods (TDG Sub-Committee) held its forty-fourth session from 25 November to 4 December 2013.
2. Under item 10 of its agenda (Issues relating to the GHS), the TDG Sub-Committee considered the following issues:
 - (a) Screening procedures for potential explosives in the GHS
 - (b) Classification and testing of desensitized explosives
 - (c) Classification of pyrophoric gases
 - (d) Corrosivity criteria
 - (i) Clarification of skin corrosion criteria for sub-categories 1A and 1B in GHS chapter 3.2 and for Packing Groups I and II in the Model Regulations paragraph 2.8.2.5
 - (ii) Work of the joint TDG-GHS informal working on corrosivity criteria
3. Other issues of interest to the GHS Sub-Committee addressed by the TDG Sub-Committee were:
 - (a) Classification of polymerizing substances
 - (b) Large pictograms in transport packagings
 - (c) Review of the Manual of Tests and Criteria
4. The Sub-Committee may wish to note the outcome of the discussions on the issues listed above which is summarized hereafter.

Outcome of the 44th session of the TDG Sub-Committee on matters of interest to the GHS Sub-Committee

5. The excerpts of the draft report of the TDG Sub-Committee on its 44th session on matters of interest to the GHS Sub-Committee are reproduced below for information of the GHS Sub-Committee. The excerpts from the report are reproduced as adopted during the report reading on 3 December 2013. The final version of the report will be circulated as document ST/SG/AC.10/C.3/88.

A. Classification criteria

1. Screening procedures for potential explosives (GHS Sub-Committee agenda item 2(a))

Document: ST/SG/AC.10/C.3/2013/56 - ST/SG/AC.10/C.4/2013/5 (Sweden)

100. The Sub-Committee endorsed the proposal for further consideration by the GHS Sub-Committee.

(Ref.Doc: ST/SG/AC.10/2013/CRP.3/Add.10)

2. Classification and testing of desensitized explosives (GHS Sub-Committee agenda item 2(a))

Document: ST/SG/AC.10/C.3/2013/58 - ST/SG/AC.10/C.4/2013/6 (Germany)

Informal documents: INF.53 (TDG) – INF.22 (GHS) (Australia)

104. The expert from Australia expressed concern at the proposal to create a new chapter for desensitized explosives in the GHS, since these desensitized explosives were not to be included in Class 1 of the Model Regulations and would remain classified in Class 3 or division 4.1 for transport purposes. Nevertheless, it was recalled that this issue had been discussed at length at previous sessions and that the proposal of Germany corresponded to a principle previously adopted and that should not be put into question at this stage.

105. The Sub-Committee supported the introduction of the proposed Chapter 2.17 in the GHS, and noted that some delegations raised a few technical questions. Therefore it was agreed to endorse all changes proposed to the GHS and agreed to changes in the Manual of Tests and Criteria between square brackets so that comments on details by the experts of the Sub-Committee and those of the GHS Sub-Committee could still be made for consideration in a second reading at the next sessions of both sub-committees.

(Ref.Doc: ST/SG/AC.10/2013/CRP.3/Add.11, as amended)

3. Corrosivity criteria: Clarification of skin corrosion criteria for GHS sub-categories 1A and 1B and TDG packing groups I and II (GHS Sub-Committee agenda item 2 (a))

Document: ST/SG/AC.10/C.3/2013/68 - ST/SG/AC.10/C.4/2013/8 (IPPIC)

115. Some experts agreed with IPPIC that there was a gap in the current criteria and that the change proposed would fill this gap simply by lengthening the observation time without changing the exposure time. Others considered that the proposal addressed rare cases and that there was no need to change the existing criteria because applying the OECD Guidelines 404 in full would also allow to fill this gap.

116. After discussion, the Sub-Committee felt that the proposal should be considered by the Joint TDG/GHS Working Group on corrosivity criteria, preferably at this session and, if

not possible, at the next session in June 2014 after consideration of the IPPIC document by the GHS Sub-Committee at its forthcoming December 2013 session.

(*Ref.Doc: ST/SG/AC.10/2013/CRP.3/Add.12*)

4. Corrosivity criteria: Work of the Joint TDG-GHS informal working group (GHS Sub-Committee agenda item 2 (c))

Informal documents:

- INF.9 (TDG) – INF.6 (GHS) (Secretariat)
- INF.29 (TDG) – INF.11 (GHS) (UK)
- INF.22 (TDG) – INF.10 (GHS) (Australia)
- INF.32 (TDG) – INF.12 (GHS) (CEFIC)
- INF.34 (TDG) – INF.13 (GHS) (CEFIC)

102. The Sub-Committee noted that the joint working group would meet on Tuesday 3 December 2013 in the afternoon. It discussed on a preliminary basis, from a transport perspective, documents submitted to the working group without prejudice to further discussion at the working group session.

103. The Sub-Committee noted the three options (Nos. 2, 5 and 6) presented in INF.29 by the expert of the United Kingdom as a way forward for follow-up to previous discussions, as well as the various comments in the related informal documents. It expressed some disappointment at the fact that this documentation had not been made available earlier, which prevented experts from consulting appropriately relevant entities at national level and defining a national position. Some experts expressed a possible preference for option 6. As a conclusion, the Chairman re-iterated the commitment of the Sub-Committee to work together with the GHS Sub-Committee on the issue of corrosivity criteria.

(*Ref.Doc: ST/SG/AC.10/2013/CRP.3/Add.10 and –CRP.3/Add.11 as amended*)

5. Pyrophoric gases (GHS Sub-Committee agenda item 2 (g))

Document: ST/SG/AC.10/C.3/2013/69 - ST/SG/AC.10/C.4/2013/9 (USA)

Informal documents:

- INF.8 (TDG) – INF.3 (GHS) (USA)
- INF.42 (TDG) – INF.14 (GHS) (EIGA)

101. The Sub-Committee noted the proposal to include pyrophoric gases as a hazard category in the flammable gases hazard class of the GHS, and comments thereto, which will be further discussed by the GHS Sub-Committee.

(*Ref.Doc: ST/SG/AC.10/2013/CRP.3/Add.10*)

6. Classification of polymerizing substances (GHS Sub-Committee agenda item (2(a)))

Document: ST/SG/AC.10/C.3/2013/62 (DGAC)

9. The principle behind the proposal was supported by most delegations, with some differences of opinion, however, on how to deal with the issue (Division 4.2 or Class 9, a new Division 4.4, criteria to be applied using the current test methods, proper shipping name for substances stabilized by temperature control, and also for those stabilized using inhibitors). The representative of DGAC would prepare a new proposal with more detailed regulations for the next session.

(*Ref.Doc: ST/SG/AC.10/C.3/2013/CRP.3*)

B. Hazard communication

1. Large pictograms on transport packagings (GHS Sub-Committee agenda item 3 (d))

Document: ST/SG/AC.10/C.3/2013/66 (DGAC)

Informal document: INF.56 (TDG) (DGAC)

48. The Sub-Committee noted the concerns of DGAC relayed by certain experts and non-governmental organizations resulting from the wider application of the GHS sometimes in a manner that they considered not always in compliance with the provisions of GHS itself and that had the potential for causing considerable confusion among emergency responders or personnel handling packages, for example in airports, or inspection authorities. Other experts did not recognise the problem as they considered that GHS pictograms provide additional information.

49. Overall, the Sub-Committee was not in favour of the DGAC proposal. It was felt that this would be better addressed in the GHS itself. The experts did not consider themselves to be competent to deal with questions that did not relate to transport.

50. The practical problems faced by emergency responders and transport workers should be brought to the attention of the GHS Sub-Committee in order to ensure more uniform GHS implementation in the countries that applied it. It would be advisable, for example, to envisage perhaps more detailed provisions for labelling according to GHS criteria that would help to show labelling done to meet the needs of the transport sector without any possible ambiguity and distinguish it from labelling done to meet the needs of other sectors. Provisions to that effect already appeared in the GHS, particularly annex 7, but could be improved. In particular, there might be a limitation on the size of GHS labels to be displayed on cargo transport units or rules about their positioning.

51. The Sub-Committee also stressed the importance of training personnel responsible for labelling to ensure that it was done properly and training of the transport workers and emergency responders who should learn to distinguish between various pictograms and their meaning.

52. The representative of DGAC was invited to consider the issue while taking into account the need for coordination with the GHS Sub-Committee.

(Ref.Doc: ST/SG/AC.10/C.3/2013/CRP.3/Add.6 as amended)

68. The representative of DGAC summarized the discussions from his point of view in an informal document also submitted to the GHS Sub-Committee under the symbol INF.24.

69. Several experts took issue with the fact that the informal document was presented as a summary of the conclusions of the Sub-Committee. During the discussion, many experts had said that they were opposed to the introduction of GHS texts into the Model Regulations, as GHS was not written in a prescribed language; others were not convinced about the problems mentioned by DGAC, at least in the countries where adequate training was provided to the persons involved, and certain conclusions mentioned by DGAC were in fact only suggestions that had been put forward.

70. Following this discussion the representative of DGAC withdrew its document.

(Ref.Doc: ST/SG/AC.10/C.3/2013/CRP.3/Add.8 as amended)

C. Other issues: Cooperation with other bodies or international organizations (Sub-Committee agenda item 4(c))

1. Work of the TDG Sub-Committee on the review of the Manual of Tests and Criteria

Document: ST/SG/AC.10/C.3/2013/43 (Chairman of the working group on explosives)

Informal document: INF.6 (TDG) (Chairman of the working group on explosives)

108. The Sub-Committee noted that these documents had been submitted in advance in order to facilitate comments from all interested delegations prior to their consideration at the next session. The secretariat was requested to keep document -/2013/43 on the agenda for the next session and to discuss with the chairman of the Working Group on Explosives how to submit the other envisaged related documents.

(Ref.Doc: ST/SG/AC.10/C.3/2013/CRP.3/Add.11)
