Secretariat

**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 Transport of Dangerous Goods

Forty-sixth session
Geneva, 1 – 9 December 2014
Item 8 (g) of the provisional agenda
**Issues relating to the Globally Harmonized System of Classification
and Labelling of Chemicals: corrosivity criteria**

Skin corrosive of Class 8 without sub-classification – default packing group assignment

Transmitted by the expert from the United Kingdom[1]

Introduction

1.   Following the various discussions in the TDG Sub-Committee, GHS Sub-Committee and the Joint TDG-GHS Working Group on Corrosivity Criteria, it was agreed that one of the key issues to be resolved by the TDG Sub-Committee was the packing group assignment when a substance or mixture is classified as Class 8 skin corrosive with no sub-classification – packing group I or packing group II.

2.   In the work leading to a draft proposal for the revision of Chapter 2.8 of the Model Regulations, amongst the criteria agreed upon by the Joint TDG-GHS Working Group (see ST/SG/AC.10/C.3/2014/25 and informal document INF.3, 45th session) from the outset were the following:

- No change in the level of safety for transport;

- The transport conditions will not become more severe;

- There should be no direct change to the classifications or packing groups of substances and mixtures listed by name in the Dangerous Goods List;

---

[1] In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

Please recycle

- The current ratio in packing group assignments should be maintained. Analysis carried out by CEFIC of the classification especially for mixtures has shown that the ratio for the assignment of packing groups in Class 8 is approximately as follows: -

Class 8 PGI – 5%

Class 8 PGII – 45%

Class 8 PGIII – 50%.

3.   Bearing in mind the above agreed criteria together with many years of experience of transporting corrosives, the low accident rate and often limited consequence of transport accidents as evidenced by a number of national transport competent authorities, the United Kingdom believes a default assignment to packing group II provides an appropriate level of safety in such circumstances. To apply the transport provisions that would ensue from assignment to packing group I would require significant new investment in transport containment systems, would limit quantities that can be transported in one movement unnecessarily and lead to over-response by the emergency services in the rare occurrences of potential transport incidents.

4.   There are also precedents for the assignment of a default packing group II without first having applied the classification criteria (see UN Nos. 3175, 3243 and 3244). Specifically UN No. 3244, Solids containing corrosive liquid, n.o.s. is allocated Special Provision 218 to the effect that this entry is assigned to packing group II without applying the classification criteria of Class 8.

5.   Also the proposed text of 2.8.3.5 in informal document INF.32 (45th session) and informal document INF.9 (27th GHS session) to deal with the default assignment contains the important proviso that this packing group should be assigned (the United Kingdom proposes packing group II) unless information is available that another packing group is applicable (in this case packing group I or packing group III). So for example packing group I would be assigned if the mixture contained a significant quantity of a substance or substances assigned to packing group I in the Dangerous Goods List.

6.   In conclusion the United Kingdom firmly believes that a default assignment to packing group II provides for appropriately safe transport conditions for a substance or mixture classified as Class 8 without sub-classification.

————————————