

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

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Item 8 (g) of the provisional agenda

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

Wording regarding the property corrosive to metals

Transmitted by the expert from Austria

Summary

Executive summary: The existing text in the Model Regulations as well as in the GHS contains the phrase “when tested on both materials” and the note that the test on the other metal is not required if the initial test on one material already proves corrosivity.

Reference documents: ST/SG/AC.10/1/Rev.18, et al.

Introduction

Modal Regulation 2.8.2.5

(ii) Are judged not to cause full thickness destruction of intact skin tissue but which exhibit a corrosion rate on either steel or aluminium surfaces exceeding 6.25 mm a year at a test temperature of 55 °C when tested on both materials.

NOTE: Where an initial test on either steel or aluminium indicates the substance being tested is corrosive the follow up test on the other metal is not required.

GHS Table 2.16.1: Criteria for substances and mixtures corrosive to metal

Category: 1

Criteria: Corrosion rate on either steel or aluminium surfaces exceeding 6.25 mm per year at a test temperature of 55 °C when tested on both materials.

NOTE: Where an initial test on either steel or aluminium indicates the substance or mixture being tested is corrosive the follow-up test on the other metal is not required.

Question of interpretation:

The test of e.g. sodium-hydroxide-solution on aluminium results in a corrosion rate exceeding 6.25 mm per year. According to the note the test with steel is not required.

Is this solution corrosive if it is not tested on both materials?

I suppose all experts will agree that the answer is yes, but to make it clear to advocates the text should be amended.

Proposal

The text "when tested on both materials" is superfluous and should be deleted.

Alternatively (if this was the intent):

“.. A corrosion rate on either steel or aluminium, or both surfaces exceeding 6.25 mm ..”
