Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

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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

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Item 2 (d) of the provisional agenda

Classification criteria and related hazard communication: work of the TDG-GHS working group on corrosivity criteria

Comments on ST/SG/AC.10/C.3/2014/69 – ST/SG/AC.10/C.4/2014/12 Proposal for revision of Chapter 2.8 of the Model Regulations

Transmitted by the expert from the United States of America

1. With respect to document ST/SG/AC.10/C.3/2014/69 – ST/SG/AC.10/C.4/2014/12 submitted for consideration at the present session, the work of the Netherlands in providing a framework for discussion on behalf of the joint TDG-GHS working group is greatly appreciated. As is evidenced by the numerous documents related to the topic submitted for consideration at this session, there is considerable interest in enhancing recognition of corrosivity classification methodologies, particularly those of a non-destructive nature, across sectors. Some delegations, while supporting the effort, have however expressed concern with introducing the entirety of the GHS text (as amended) within the Model Regulations, expressing instead a preference for including specific additional methods as appropriate while maintaining the present structure of the Model Regulations for transport. To facilitate discussion, specific comments of both a technical and structural nature are outlined herein for consideration by the TDG and GHS sub-committees in relation to this important work.

Technical comments

2. Several classification assessment methods have been proposed for inclusion within the Model Regulations that are not currently referenced. These include the use of extreme pH, bridging principles for mixtures, and an additivity method of classification for mixtures. Some of these methods, in particular the additivity method, continue to be the subject of expert review. At the heart of this challenge is the fact that corrosive components in a mixture do not necessarily contribute to the overall corrosivity in an additive manner. The severity of the corrosivity of a mixture may be greater or less than the sum of its constituents. Therefore some measure of a safety factor must be built in to any approach in order for that approach to be acceptable from a safety perspective. Equally an overly conservative approach could result in classifications that vastly overstate the hazard of a mixture. To date there has been no consensus on a specific way forward to address this issue, but this should not preclude the working group from continued efforts.

Structural comments

3. While there has been a great deal of support for the mutually beneficial goal of enhanced recognition of the test methodologies themselves, a number of concerns with reproducing the entire GHS text within the Model Regulations for transport have been highlighted during the many discussions over the past several biennia. These include use of terminology not typically used in the transport regulations (such as categories and sub-classifications) and the inclusion of text that is not regulatory in nature and could lead to varying or conflicting interpretations within the regulated community and amongst national authorities. Viewed in context with the existing provisions of Part 2 of the Model Regulations, a large portion of the GHS text proposed for inclusion is not consistent with the existing Model Regulations text relevant to classification. The GHS text, by design, often provides guidance rather than being drafted as a model regulation. This is entirely appropriate for the GHS but not considered appropriate within a model regulation. While there has been some attempt to address this concern by converting the text to a mandatory tone, this does not solve the fundamental issue as a significant portion of the GHS text is specifically not intended to be regulatory in nature. It is believed that enhanced recognition of additional classification methodologies is achievable through adoption of the additional validated methods and that this can be accomplished while still maintaining consistency with the present and long-standing basic structure of the Model Regulations for transport.

Conclusion

4. While the adoption of the entirety of the GHS text as proposed in document ST/SG/AC.10/C.3/2014/69 – ST/SG/AC.10/C.4/2014/12 is in the view of some delegations not the most desirable way forward, it is suggested that the Sub-Committee could work to implement within the transport Model those methods that are considered generally acceptable at this time while continuing to evaluate the inclusion of additional methods as discussions on those methods progress within the working group. The expert from the United States has submitted a separate proposal (see ST/SG/AC.10/C.3/2014/99 – ST/SG/AC.10/C.4/2014/18) addressing those methods not currently still the subject of such further work or refinement.