

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

27 November 2014

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Item 9 of the provisional agenda

Programme of work for the biennium 2015-2016

Programme of work for the biennium 2015-2016 – editorial revision of the Manual of Tests and Criteria

Transmitted by the expert from the United Kingdom

Background and discussion

1. During the forty-fifth session of the Sub-Committee consideration was given to document ST/SG/AC.10/C.3/2014/61 together with informal document INF.8 and Add. 1-5 submitted by the Secretariat concerning an editorial revision of the Manual of Tests and Criteria taking into account its use in the overall context of the GHS. It was recognised that editorial changes could have unintended consequences and that this could not be checked in the time available during the session. Delegates were therefore invited to identify points requiring more in-depth discussion (see ST/SG/AC.10/C.3/90, paras. 34 – 37).

2. The expert from the United Kingdom has carried out an initial review of the proposed amendments and wishes to highlight the following points which he believes need more detailed consideration in discussion over the next biennium (*these are not in order of importance and some minor editorial comments are also included*):

- A decision in principle needs to be made on a consistent approach to terminology for describing what is being addressed. Whilst transport lives with ‘dangerous goods’ as an all encompassing term, it also refers to substances and articles without defining those terms. GHS defines ‘substances’ and ‘mixtures’ but not ‘preparations’ or ‘solutions’ which are other terms appearing in various parts of the texts. Perhaps a compromise might be to use the shorthand ‘dangerous goods/hazardous substances’ with a Note at the beginning of the Manual to amplify what this is intended to cover?
- The term “intended for transport” appears (for example in 1.5.2) and “offered for transport” appears (for example in 30.2) in the Manual. In 30.2 it is proposed to simply refer to “before a new product is offered” or to replace the sentence as “New products shall be subjected to the appropriate classification procedure”. It is necessary, however, to be sure whether the reference is actually correctly referring to an action that is relevant only to transport.
- Sometimes the Manual refers to “and” or “or” or sometimes to “and/or”. Usage needs to be consistent and carefully checked as to whether there is a real difference in application.

- The heading of Chapter 32 has been amended to refer to ‘liquids and ‘solids’ but the same change has been made to tables which only refer to either a liquid or a solid. This appears to have been changed by an IT search and the same issue arises several times.
- In 1.2.1.4.3 reference to “pyrophoric liquids or solids” should be to “substances liable to spontaneous combustion”.
- In 1.2.3.2 it should read “six individual GHS hazard classes” not five in relation to Class 4 in transport.
- In 1.4.3 it doesn’t need the term ‘mixtures’ added?
- In the Contents of Part III page - why add “and liquids and solids” to the title of Chapter 33?
- In the same Contents page add ‘self-heating substances and mixtures’.
- 32.3.2.3 replace ‘non-dangerous’ with ‘not classified’?
- 32.4 Are the referenced standards still relevant?
- Why is 37.1.3 included if 37.1.2 already refers to Chapter 2.8 and this Chapter deals with corrosive to metals?
- 37.2.1 line 1 delete ‘offered for transport’ also add ‘of GHS’ after “Chapter 2.16, paragraph 2.16.2”.
- Chapter 38 does not need to be amended as it is only used for transport purposes?
- Chapter 33 – Figure 33.2.1.3 the GHS Secretariat comments seem to be correct.
- 33.3.1.3.3.4 refers to ‘transported in packages’. How should storage in bulk be addressed?
- In Figure 33.3.1.3.3.1 should the last box be “not classified as self-heating”?
- 34.3.1 there is a typo in line 3 which should refer to ‘2.14.2’.
- Section 34.3 needs careful checking by GHS colleagues.
- 34.4.1.2.6 refers to ‘in the form in which it will be transported’ and similarly in the following paragraph. Does this need to be changed to “as presented” as suggested by the GHS Secretariat?
- 34.4.3 O3 test the GHS Secretariat comments appear to be correct as do those marked RG27 + RG29.

3. In Part 1 United Kingdom explosives experts believe that the proposed editorial changes could introduce confusion and contradiction. One example is in respect of the temperature at which the tests are carried out. At present this is the temperature encountered during transport but with the rewording to ‘transport, storage or supply and use’ it begs the question as to which temperature is to be used. For the purposes of handling, storage and use, the range of temperatures at which the material can be safely handled is more important rather than a single temperature.

Proposal

4. The Secretariat is requested to consider these comments and any others submitted by experts and observers when reintroducing paper INF.8 and Adds. 1 - 5 for further consideration during the 2015/6 biennium.