

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

**10 June 2015**

### **Sub-Committee of Experts on the Transport of Dangerous Goods**

#### **Forty-seventh session**

Geneva, 22 – 26 June 2015

Item 10 (e) of the provisional agenda

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

##### **Corrosivity criteria**

### **Proposal for the classification of mixtures or solutions regarding health hazards (Chapter 2.6 and 2.8) based on the information of the ingredients**

**Transmitted by the European Chemical Industry Council (CEFIC) and  
the International Association for Soaps, Detergents and Maintenance  
Products (AISE)**

#### **Purpose**

1. Following on from the discussions at the forty-sixth session of the Sub-Committee of Experts on the Transport of Dangerous Goods (TDG Sub-Committee), concerning proposed changes to Chapter 2.8 of the United Nations Model Regulations and the difficulties identified on the use of the GHS alternative methods for the classification of mixtures and solutions as class 8 including the assignment of the packing groups, CEFIC/AISE would propose an alternative more general approach for this topic.
2. The proposed approach refers to provisions in GHS that indicate that classification of mixtures may be based on data on the ingredients where sufficient information on these is available. With this proposal, existing data on human experience and other information of the ingredients can still be used, and unnecessary testing to assign packaging groups may be avoided.
3. As there was no consensus on the reference to GHS as a model for classification of mixtures and solutions, CEFIC / AISE would like to propose to add a general statement for the classification approach in chapter 2.0 and to the relevant chapters 2.6 and 2.8. The same approach should also be applied to class 9 for environmentally hazardous substances. There is no need to newly implement text to class 9, as full harmonization with GHS has already been achieved for this class.

## Introduction

4. Several documents have been issued, which were already discussed in the past. A list of these is available in the working document ST/SG/AC.10/C.3/2015/21 from Canada.
5. CEFIC / AISE believe that a more general approach may be helpful and that certain rules or sequences for classifying mixtures and solutions can be agreed on. It is therefore suggested that the general approach shown in paragraph 5 below should be considered for inclusion in chapter 2.0:
6. Sequence to approach the classification of mixtures and solutions for transport:
  - (a) Classify based on human experience
  - (b) Test data on the mixture itself
  - (c) Do not classify to class 6.1 or class 8 if mixture is not classified to the corresponding hazard classes according to GHS chapter 3.1 and 3.2.
  - (d) Apply bridging principles using similar mixtures
  - (e) Classify the mixture based on the information available on the ingredients of the mixture as per 2.0.2.5 – 2.0.2.9 in the Model Regulations
7. Should this classification sequence for classifying mixtures and solutions be introduced, then additional short texts should be added in chapter 2.0 to explain the approach (see Proposal).
8. This would implement the bridging principles, which were widely agreed.
9. Regarding the classification based on the extreme pH-value for class 8, the classification of the ingredients has to be taken into account for the classification to class 8 and the assignment of the appropriate packing group. This would be based on the classification of the ingredients, which in some cases are based on the Dangerous Goods list in the UN Model Regulations. The extreme pH-value should not overrule the classifications and the assignment of the packing group of the ingredients.
10. A concentration limit for a classification based on the additivity method to class 6.1 or class 8 is not given here. So it is up to the classifier to determine the applicable concentration limit for each mixture or solution, based on already existing approaches and guidelines.
11. For Class 9 (environmentally hazardous substances) the classification process is already in place including the concentration limits and, the multiplication -factor for more severe hazardous ingredients. Therefore additional text for chapter 2.9 is not proposed.
12. This proposal is not affecting in any case the classification according to the classification criteria for corrosive to metals.
13. CEFIC / AISE are of the opinion that this approach could be a sensible compromise between the last proposals of the working group on the harmonisation of classification criteria for class 8 presented in the course of the meeting in December 2014 and the result of the discussion at that meeting..

## Proposal

14. Add a new paragraph in chapter 2.0
  15. 2.0.2.9.2 Classification of solutions and mixtures without test data for the mixture or solution itself in regard to health hazards and environmental hazards
  - 16. Human experience / experience**
  17. For the classification of solutions and mixtures and the assigning of packing groups account shall be taken of human experience
  - 18. Reference to GHS**
  19. Solutions and mixtures which do not meet the criteria of the UN-GHS for the following hazard classes:
    - Categories 1, 2 or 3 for acute toxicity
    - Category 1 for corrosive to skin
    - Acute category 1 and/or chronic category 1 or category 2 for aquatic toxicitymay be considered as not dangerous for transport in regard to the classes 6.1, 8 and 9 (environmentally hazardous substances only)
  - 20. Classification based on ingredients of a mixture / solution:**
  21. Solution and mixtures may be classified based on the classification of their ingredients
    - For class 6.1 see 2.6.2.2.4.9
    - For class 9 see 2.9.3.4.6
    - For class 8 see 2.8.2.6
  22. Add a new paragraph to chapter 2.6.1  
2.6.2.2.4.7  
Solution and mixtures containing ingredients which are assigned to class 6.1 may be classified based on the information available for the ingredients according to the UN Model Regulations. This applies also for the assignment for the packing group.
  23. Add a new paragraph to chapter 8  
2.8.2.6  
Solution and mixtures containing ingredients which are assigned to class 8 may be classified based on the information available for the ingredients according to the UN Model Regulations. This applies also for the assignment for the packing group. This includes also solutions and mixtures with an extreme pH-value ( $\leq 2$  or  $\geq 11,5$ ).
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