

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 Globally Harmonized
System of Classification and Labelling of Chemicals

7 July 2017

Thirty-third session

Geneva, 10-12 July 2017

Items 2 and 4 (a) of the provisional agenda

Work of the Sub-Committee of Experts on the Transport of Dangerous Goods on its fifty-first session on matters of interest to the GHS Sub-Committee

Note by the secretariat

1. At its fifty-first session, the Sub-Committee of Experts on the Transport of Dangerous Goods (TDG Sub-Committee) considered matters of interest to the GHS Sub-Committee under items 2 and 10 of its agenda¹. These included:

- (a) Explosives and related matters;
- (b) Testing of oxidizing substances;
- (c) Use of the Manual of Tests and Criteria in the context of the GHS; and
- (d) Assessing the potential development of a global list of chemicals classified in accordance with the GHS

3. After preliminary consideration in plenary, the Sub-Committee referred to the Working Group on Explosives the discussions on:

- (a) Explosives and related matters (agenda item 2), including:
 - (i) Amendment of section 10.3.3.4 of the Manual of Tests and Criteria
 - (ii) Improvement of the 8 (c) Koenen Test;
 - (iii) Standard detonators;
 - (iv) Electronic detonators;
 - (v) Stability tests for industrial nitrocellulose;
 - (vi) Classification of desensitized explosives;
 - (vii) Security provisions for explosives;
 - (viii) Transport of fireworks in small quantities;
 - (ix) Tests for oxidizing liquids and solids;
- (b) Use of the Manual of Tests and Criteria in the context of GHS (agenda sub-item 10 (d));

¹ The final version of the report of the TDG Sub-Committee will be circulated as document ST/SG/AC.10/C.3/102 (<http://www.unece.org/trans/main/dgdb/dgsubc3/c3rep.html>)

4. The Working Group met from 3 to 6 July under the chairmanship of Mr. De Jong (Netherlands). The full report of the Working Group is available in INF.38 (51st session of the TDG Sub-Committee)².

5. For the outcome of the discussions on the amendment of section 10.3.3.4 of the Manual of Tests and Criteria; the improvement of the 8 (c) Koenen Test; standard and electronic detonators; security provisions for explosives; and transport of fireworks in small quantities, refer to the report of the Working Group on Explosives (INF.38, paragraphs 4, 5, 6, 7, 10 and 12).

6. The outcome of the discussions of the TDG Sub-Committee on matters of interest to the GHS Sub-Committee is summarized below.

Outcome of the discussions on matters in the agenda for the thirty-third session of the GHS Sub-Committee

Item 1 Use of the Manual of Tests and Criteria in the context of the GHS (GHS Sub-Committee agenda item 2 (a))

Informal documents: TDG/51/INF.7 - GHS/33/INF.3
TDG/51/INF.7/Add.1- GHS/33/INF.3/Add.1
TDG/51/INF.7/Add.2- GHS/33/INF.3/Add.2

Discussion: The Working Group on Explosives noted that:

- clarification is needed to explain that, in appropriate places, Test Series 4 and 6 are intended only to be performed on goods in transport configuration. Also, clarification is needed to explain that, in certain instances, the results of Test Series 1, though not required for classification, may be needed for hazard assessment and hazard communication.
- there is certain text in the Manual of Tests and Criteria that is recommended for revision and the same text also appears in the Model Regulations and/or the GHS document. It is unclear to the working group whether, if the changes to the Manual of Tests and Criteria are approved, the same changes would be necessary where the text also appears in the Model Regulations and/or the GHS document. The working group is seeking guidance from the Sub-Committee as to how this should be addressed.
- there are numerous references to “product” in the Model Regulations and the Manual of Tests and Criteria. However, due to the sheer volume of revisions that would be required and the potential for unintended consequences, it is not recommended to replace these occurrences with “substance or article”.
- the review of Sections 20 – 28 (INF.7/Add.2) will take place at a later session.

Conclusion: The Chairman of the working group will consolidate the comments and suggestions from the working group into new working documents and will distribute them to the working group for verification and further review.

The TDG Sub-Committee endorsed the conclusion of the Working Group.

(Ref.Doc: TDG/51/INF.38, paragraph 14 and draft report of the TDG Sub-Committee on its 51st session: ST/SG/AC.10/C.3/2017/CRP.1/Add.8, paragraph 71)

² <http://www.unece.org/trans/main/dgdb/dgsubc3/c3inf51.html>

Item 2 Classification of desensitized explosives (GHS Sub-Committee agenda item 2 (a))

Informal document: TDG/51/INF.10 – GHS/33/INF.4 (CEFIC, WONIPA)

Discussion: The Working Group on Explosives considered the proposal to use the test results (SprengLR011) already achieved by the German competent authority BAM over the past 30 years for the classification of industrial nitrocellulose products according to the new GHS chapter 2.17 desensitized explosives and concluded that the data was useful and how to include it in the GHS should be addressed by the intersessional group discussed above.

Conclusion: Referred to an intersessional group³ for further consideration.

The TDG Sub-Committee endorsed the conclusion of the Working Group.

(Ref.Doc: TDG/51/INF.38, paragraph 9, and draft report of the TDG Sub-Committee on its 51st session: ST/SG/AC.10/C.3/2017/CRP.1/Add.8, paragraph 71)

Item 3 Review of Chapter 2.1 of the GHS (GHS Sub-Committee agenda item 2 (b))

Informal documents: TDG/51/INF.15 - GHS/33/INF.7 (Sweden)
TDG/51/INF.44 - GHS/33/INF.13 (Sweden)

The Sub-Committee took note of the amended programme of work for the revision of Chapter 2.1 and the hopefulness that the expert from Sweden expressed in progressing the work.

(Ref.Doc: draft report of the TDG Sub-Committee on its 51st session: ST/SG/AC.10/C.3/2017/CRP.1/Add.8, paragraph 72 as amended)

Item 4 Assessing the potential development of a global list of chemicals classified in accordance with the GHS (GHS Sub-Committee agenda item 4 (a))

Document: ST/SG/AC.10/C.3/2017/7- ST/SG/AC.10/C.4/2017/1 (USA)

The Sub-Committee expressed gratitude for the work done so far and support for continuing work in this area. It recommended pursuing harmonised classifications recognizing that there are multiple lists worldwide applying to different sectors with conflicting classification results in some cases. It recognised the amount of resources needed, and suggested that the work could perhaps start with a comparison of classification results to identify discrepancies. It underlined that this Sub-Committee had a procedure for updating classification based on data that can be used.

(Ref.Doc: Draft report of the TDG Sub-Committee on its 51st session: ST/SG/AC.10/C.3/2017/CRP.1/Add.8, paragraph 70)

Outcome of the discussions on other matters of interest to the GHS Sub-Committee**Item 5 Stability tests for industrial nitrocellulose**

Document: ST/SG/AC.10/C.3/2017/3 (Germany)

Informal documents: TDG/51/INF.9 (CEFIC, WONIPA)
TDG/51/INF.24 (SAAMI)

³ Refer to the conclusion by the Explosives Working Group under item 5 of this document.

Discussion: The Working Group on Explosives considered the issues raised by Germany related to stabilization of nitrocellulose (NC) mixtures even if the mixture becomes completely dry and agreed that additional tests to confirm stability of NC mixtures were needed. Much of the discussion concerned the issue of stabilization of NC and the need for such, especially once the NC is dried. The working group agreed that stabilization was required to ensure safe handling of NC but also determined that the 3(c) thermal stability test was not suited for evaluating NC stabilization. The working group unanimously concluded that the Bergmann Junk test and the Methyl Violet Paper tests were suitable tests for such assessment and recommended their performance in place of the 3(c) test when classifying NC. However, the working group decided that the auto-ignition temperature test was not beneficial.

Conclusion: CEFIC will lead an intersessional group to work out details of implementation, test procedures, placement of the Bergmann Junk test and the Methyl Violet Paper test in the Model Regulations and the Manual of Tests and Criteria, and will consider some allowance for grandfathering currently existing NC approvals and prepare a new proposal for the next session.

The Sub-Committee endorsed the conclusions of the Working Group.

(Ref.Doc: TDG/51/INF.38, paragraph 8, and draft report of the TDG Sub-Committee on its 51st session: ST/SG/AC.10/C.3/2017/CRP.1/Add.8, paragraph 71)

Item 6 Testing of oxidizing substances

Documents: ST/SG/AC.10/C.3/2017/28

Informal document: TDG/51/INF.12

The Sub-Committee thanked the expert from France for the progress report on on-going work on addressing the issues raised by the replacement of the cellulose used as reference material for testing of oxidizing substances, as listed in INF.12. The expert from France invited interested experts and laboratories to provide comments to address these issues.

(Ref.Doc.: Draft report of the TDG Sub-Committee on its 51st session: ST/SG/AC.10/C.3/2017/CRP.1/Add.8, paragraph 69 as amended)