

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

6 December 2017

Thirty-fourth session

Geneva, 6-8 December 2018

Item 2 (a) of the provisional agenda

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

Note by the secretariat

1. At its fifty-second 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; and
- (c) Use of the Manual of Tests and Criteria in the context of the GHS;

3. Following preliminary consideration in plenary, most issues related to the agenda item were referred to the Working Group on Explosives, which met from 27 November to 1 December 2017, with Mr. E. de Jong (Netherlands) as Chair.

4. Informal documents INF.3 and Add.1-2 and INF.28 on the Use of the Manual of Tests and Criteria in the context of GHS under agenda item 10 were also referred to the Working Group on Explosives. The full report of the Working Group has been circulated as in INF.53 and Add.1 and 2 (fifty-second session of the TDG Sub-Committee)².

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

Item 1 Stability tests for industrial nitrocellulose (GHS Sub-Committee agenda item 2 (a))

Document: ST/SG/AC.10/C.3/2017/35 (Germany)

Informal document: TDG/52/INF.6 (CEFIC, WONIPA)

Discussion: The working group generally agreed with the proposed test descriptions in INF.6, although it was noted that some additional drafting work was needed (the test procedures are not formatted in a manner typically found in the test manual (e.g., text about safety equipment) and the Methyl Violet Paper test procedure is not clearly described).

¹ The final version of the report of the TDG Sub-Committee will be circulated as document ST/SG/AC.10/C.3/104 (<http://www.unece.org/trans/main/dgdb/dgsubc3/c3rep.html>)

² <http://www.unece.org/trans/main/dgdb/dgsubc3/c3inf52.html>

To address some concerns about implementation for Class 1 nitrocellulose vs. Division 4.1 nitrocellulose, two special provisions (one for the Class 1 entries and another one for Division 4.1 entries) were developed and considered. After review, the Working Group agreed on the proposed text for the special provisions.

On a question raised by China in the plenary on UN No.2059, the Working Group concluded that the special provision was not needed for this entry, given that the starting material to make these solutions would already be subject to the special provisions and that the tests could not be performed on the solutions themselves.

On the possible need for transitional provisions, the Working Group concluded that the current 75°C thermal stability test was not predictive enough for longer term stability; therefore, no transitional provision is required.

Conclusion: CEFIC and/or Germany will draft a formal proposal for the next session. They asked interested parties to correspond with them by 1 February so that the working paper could be completed by the working paper submission deadline.

The TDG Sub-Committee noted the conclusions of the Working Group.

(Ref.Doc: report of the Working Group on Explosives, TDG/52/INF.53, paragraph 5)

Item 2 Testing of oxidizing substances (GHS Sub-Committee agenda item 2 (a))

Document: ST/SG/AC.10/C.3/2017/45 (France)

Informal document: TDG/52/INF.35 (France)

The Sub-Committee took note of the progress of work on the topic, including the intention of the expert from France to submit an official proposal at the next session of the TDG and GHS sub-committees. Experts who so wished were invited to transmit their comments to the expert from France so that they could be taken into account in the final proposal.

(Ref.Doc.: Draft report of the TDG Sub-Committee on its 52nd session: ST/SG/AC.10/C.3/2017/CRP.3/Add.5, paragraph 41)

Item 3 Use of the Manual of Tests and Criteria in the context of the GHS (GHS Sub-Committee agenda item 2 (a))

Informal documents: TDG/52/INF.3 and Add. 1 and 2 - GHS/34/INF.3 and Adds 1 and 2
TDG/52/INF.13 - GHS/34/INF.7 (AEISG)
TDG/52/INF.28 - GHS/34/INF.12 (SAAMI)

The TDG Sub-Committee noted that:

- The working group completed review of Sections 1 and 10 of the Manual of Tests and Criteria (INF.3 and INF.3/Add.1). Proposals in informal document TDG/52/INF.13- GHS/34/INF.7 from AEISG were considered by the working group, but there was no support for their adoption. Several proposals in TDG/52/INF.28 - GHS/34/INF.12 from SAAMI were adopted, including amendments from the working group, and the remainder were withdrawn. All accepted revisions to these sections of the manual are provided in Add.1 and Add.2 to the report of the Explosives Working Group (refer to TDG/52/INF.53/Add.1 and 2).
- SAAMI cautioned that, as the manual is generally being made sector-neutral, other physical properties currently not addressed in the manual, such as electrostatic sensitivity, might be considered. In that case, proposals should be made to GHS.

- A review of Part II of the manual (INF.3/Add.2) was started and will continue during the next session.
- Agreed changes will be submitted to the Sub-Committee as formal proposals for adoption during the next session.

(*Ref.Doc: report of the Working Group on Explosives, TDG/52/INF.53, paragraph 17*)

Item 4 Classification of desensitized explosives for the purposes of supply and use according to GHS Chapter 2.17: test results on industrial nitrocellulose (GHS Sub-Committee agenda item 2 (a))

Informal documents: TDG/52/INF.7 – GHS/34/INF.4 (CEFIC and WONIPA)
TDG/52/INF.14 – GHS/34/INF.9 (SAAMI)

Discussion: It was generally agreed that classification based on existing test data, where appropriate, was desirable in lieu of actually performing tests. There was some discussion regarding the need to be more specific in describing the steel drum packaging to which the data applied.

Sweden observed some discrepancies between the results presented in TDG/52/INF.7 – GHS/34/INF.4 and the results published in 51.4.5.1 of the Manual of Tests and Criteria. WONIPA volunteered to check it.

Conclusion: CEFIC and SAAMI will prepare updated proposals for the next session.

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

(*Ref.Doc: report of the Working Group on Explosives, TDG/52/INF.53, paragraph 6*)

Item 5 Review of Chapter 2.1 of the GHS (GHS Sub-Committee agenda item 2 (b))

Informal documents: TDG/52/INF.20 - GHS/34/INF.10 (Sweden)
TDG/52/INF.57 - GHS/34/INF.20 (Sweden)

The Sub-Committee noted that the group had discussed the two different proposed schemes for classification of explosives as reflected in the annexes of INF.20. The outcome of subsequent discussions involving the informal correspondence group was a tentatively single classification system and criteria as described in informal document INF.57.

The representative of SAAMI explained that the idea to group most divisions into a single sub-category in the GHS was intended for hazard communication purposes, and consideration should be given to address potential unintended consequences.

It was noted that the outcome of the discussions of the Working group on explosives and the informal correspondence group would be considered by the GHS Sub-Committee at its thirty-fourth session.

The Sub-Committee considered that it would be appropriate to discuss this item jointly with the GHS Sub-Committee during a joint meeting of the TDG and GHS sub-committees in July 2018. Subject to the agreement of the GHS Sub-Committee to this proposal, the date, the time needed and the topics to be discussed at the joint session could be decided by the officers of both sub-committees after the deadline for submission of documents.

(*Ref.Doc: report of the Working Group on Explosives, TDG/52/INF.53, paragraph 10, and draft report of the TDG Sub-Committee on its 52nd session: ST/SG/AC.10/C.3/2017/CRP.3/Add.7, paragraphs 54 and 55 and ST/SG/AC.10/C.3/2017/CRP.3/Add.9, paragraphs 55 bis and 55 ter, as amended*).