

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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Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 7 (d) of the provisional agenda

Issues relating to the Globally Harmonized System of Classification and Labelling of Chemicals: use of the Manual of Tests and Criteria in the context of the GHS

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals

Thirty-sixth session

Geneva, 5-7 December 2018

Item 3 (a) of the provisional agenda

Classification criteria and related hazard communication: work of the Sub-Committee of Experts on the Transport of Dangerous Goods (TDG) on matters of interest to the GHS Sub-Committee

Alignment of the wording of “shall be considered” and “shall be categorised” in the Manual of Tests and Criteria in the context of the GHS

Transmitted by the expert from Germany

Introduction

1 In the context of addressing explosives (class 1), which have a high mechanical or thermal sensitivity and therefore need to be excluded from class 1 for the purpose of transport regulations, the UN Manual of Tests and Criteria (UN-MTC) expressed this by the following wording (e. g. section 13.1 of the UN-MTC Rev. 6):

“... *the substance is considered too unstable to transport.*”

2. During the revision work of the UN-MTC in the context of the GHS provisionally the alternative term “*unstable explosive*” was introduced in the UN-MTC as the name of a new category. This originates from the GHS defining in chapter 2.1 in Table 2.1.1 a category, not known under the provisions for transport, called “*unstable explosives*”.

3. As a result from recent editorial work it appears, that the latest amendment to revision 6 of the UN-MTC (ST/SG/AC.10/11/Rev.6/Amend.1), but also in current versions circulating in the expert group, make use of two slightly different wordings:

(a) “... *[is considered to be] an unstable explosive ...*” (e. g. section 13.7.1.3)

(b) “... *shall be categorised as an unstable explosive ...*” (e. g. section 13.6.1.4.2)

4. The expert from Germany suggests to align the wording in a consistent way, giving preference to variant (b). Since on other occasions the wording *classified* is used, rather than *categorised*, this should be considered, too.

Proposal 1

5. The working group may wish to address the above mentioned issue and find a position to be allowed for future editing.

Proposal 2

6. In view of the category system of the GHS the wording “... *shall be categorised as an unstable explosive ...*” is more appropriate, and taking into account common language now all occurrences of “... *is considered to be an unstable explosive*” should be replaced by “... *shall be classified as an unstable explosive ...*”. This is specifically the case in the UN-MTC (Rev. 6 with ST/SG/AC.10/11/Rev.6/Amend.1) in sections:

13.4.7.5.1, 13.4.7.5.2, 13.5.1.3.4, 13.5.2.4, 13.6.1.4.2.

7. Checking the wording on the basis of Rev. 6 plus the amendment no. 1, which only lists changes, is prone to oversights and the wording should be once more verified on a final document for Rev. 7 of the UN-MTC.
