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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

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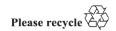
Deletion of definitions for physical hazard classes in chapter 1.2 of the GHS

Transmitted by the expert from Germany*

- 1. Reference is made to paragraph 5 of informal document INF.8 submitted at the thirty-eighth session of the Sub-Committee in which the secretariat proposed to add definitions for physical hazard classes in chapter 1.2 of the GHS. The proposal concerned "Aerosols (aerosol dispensers)", "Chemicals under pressure" and "Gases under pressure" and aimed at more consistency in chapter 1.2 because definitions for the other physical hazard classes are contained in chapter 1.2.
- 2. At that session, the expert from Germany proposed to delete the definitions for physical hazard classes currently contained in chapter 1.2 instead of including those that are currently not contained therein. Some other delegations supported this suggestion in principle.
- 3. This document is the alternative proposal mentioned in paragraph 2 of ST/SG/AC.10/C.4/2020/2. It provides arguments for the deletion of definitions for physical hazard classes currently contained in chapter 1.2 as well as the corresponding proposal.

Justification

- 4. There are three main arguments for the deletion of definitions for physical hazard classes from chapter 1.2 of the GHS:
 - (a) The physical hazard classes (just as the health and environmental hazard classes) are defined by the respective chapters, the criteria contained therein and especially by the definitions that are contained in each hazard class chapter. The definitions are an integral part of the respective hazard class chapter and should be understood in connection with the chapter containing also the criteria.



^{* 2020 (}A/74/6 (Sect.20) and Supplementary, Subprogramme 2.

- (b) The definitions for physical hazard classes given in chapter 1.2 are only duplicating the definition already contained in the respective hazard class chapter. Such duplication should be avoided because any change to the text might result in inconsistencies in case the same change is not introduced at the other (duplicating) place. There are already examples where definitions in the hazard class chapters have been changed but where the same change has not been introduced in chapter 1.2 (for example "mixtures" have been added to the definition for pyrotechnic substances in chapter 2.1 but not in chapter 1.2).
- (c) Chapter 1.2 also does not contain a complete list of definitions for health or environmental hazard classes (for example there is no definition for "Acute Toxicity"). In view of the arguments given under (a) and (b), this is appropriate. Consequently, consistency for chapter 1.2 would not be achieved by (only) adding three more physical hazard class definitions but rather by deleting physical hazard class definitions from chapter 1.2.
- 5. In addition to the arguments given above, it should be noted that also the UN Model Regulations do not give definitions of the classes/divisions in their chapter 1.2 but included them in the respective chapters of the classes/divisions.
- 6. It should be noted that this proposal concerns only the duplicative definitions for physical hazard classes as these are contained in the respective chapters. It does not aim at deleting other properties/safety characteristics such as the flash point or the self-accelerating decomposition temperature (SADT). Also, definitions concerning health or environmental hazards are not addressed in this proposal.

Proposal 1

7. The following definitions are contained in the respective physical hazard class chapters (either as definition or as criteria) and it is proposed to delete them from chapter 1.2. The references in brackets are included for information and are based on the eighth revised edition of the GHS.

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Chemically unstable gas (also contained in 2.2.1.3)
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Compressed gas (also contained in 2.5.2.1, Table 2.5.1)

Corrosive to metal (also contained in 2.16.1)

Desensitized explosives (also contained in 2.17.1.1)

Dissolved gas (also contained in 2.5.2.1, Table 2.5.1)

Explosive article (also contained in 2.1.1.1)

Explosive substance (also contained in 2.1.1.1)

Flammable gas (also contained in 2.2.1.1)

Flammable liquid (also contained in 2.6.1)

Flammable solid (also contained in 2.7.1)

Liquefied gas (also contained in 2.5.2.1, Table 2.5.1)

Organic peroxide (also contained in 2.15.1.1)

Oxidizing gas (also contained in 2.4.1)

Oxidizing liquid (also contained in 2.13.1)

Oxidizing solid (also contained in 2.14.1)

Pyrophoric gas (also contained in 2.2.1.2)

Pyrophoric liquid (also contained in 2.9.1)

Pyrophoric solid (also contained in 2.10.1)

Pyrotechnic article (also contained in 2.1.1.1)

Pyrotechnic substance (also contained in 2.1.1.1)

Readily combustible solid (also contained in 2.7.1)

Refrigerated liquefied gas (also contained in 2.5.2.1, Table 2.5.1)

Self-heating substance (also contained in 2.11.1)

Self-reactive substance (also contained in 2.8.1.1)

Substance which, in contact with water, emits flammable gases (also contained in 2.12.1)

Proposal 2

8. Before finalizing this document, the expert from Germany sought the advice of other delegations that supported the proposal by the expert from Germany in principle. One of them suggested to adapt also the introductory sentence in chapter 1.2 to better reflect what definitions are given in chapter 1.2. The expert from Germany appreciates that input and in line with that, proposes to insert the following text at the beginning of Chapter 1.2 (new text is shown in **bold** and <u>underlined</u>):

"This Chapter provides definitions and abbreviations of general applicability that are used throughout the GHS. Additional definitions of the individual hazard classes are presented in the relevant chapters.

For the purposes of the GHS:"

Further considerations:

9. Further input of the supportive delegations referred to possible future considerations on principles for including definitions in chapter 1.2 or not. A criterion for including definitions in chapter 1.2 could be that the respective term is used in more than one chapter of the GHS and thus could be considered as a general term. If that principle was applied, further definitions could be deleted, such as "Ozone Depleting Potential (ODP)" (only used in chapter 4.2). The Sub-Committee may wish to decide whether it would like to further explore general principles as guidance on how to deal with definitions in the future.

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