

**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
Transport of Dangerous Goods**

(Twenty-sixth session, 29 November-3 December 2004)

Agenda item 2

Self-reactive substances

Comments on ST/SG/AC.10/C.3/2004/107

Transmitted by the Expert from FRANCE

Background

In paper ST/SG/AC.10/C.3/2004/107, the United States of America proposes to amend the paragraph 2.4.2.3.1.1 (b) and the note 3, in order to delete the brackets in the text 2.4.2.3.1.1 (b) from the sub-committee at the 25th session.

An informal paper (UN/SCETDG/24/inf.35) described the French justification about classification considerations, as type G or F (of div. 4.1) of SRS in case of specific mixtures meeting both criteria for oxidising substances and type F or G SRS.

We thank the expert from the United States of America for the efforts he made to improve the text adopted at the last session but we would like to make the following comments.

Comment on proposed text of note 3 :

- Mixtures meeting criteria for oxidising substances and type F SRS : the self-reactive properties generate a much bigger danger than the one ordinary pertaining to the oxidising properties. Due to the low possible values of SADT and low explosive power; although this was not part of the French initial proposal a compromise was made to keep these substances as oxidisers but we could accept, as proposed by the expert from the United States of America, to consider them as type F SRS.
- Mixtures meeting criteria for oxidising substances and type G SRS are not subject to the provisions for self-reactive substances of division 4.1): these mixtures should be considered as substances of division 5.1 according to assignment procedure of division 5.1. otherwise they would fall outside the range of the regulation.
- A 5% cut-off limit of combustible organic substances seems to be appropriate.
- In document ST/SG/AC.10/C.3/2004/107 the text has been simplified but some aspects of the problem have been forgotten especially the way to treat type G SRS. We think it is clearer to keep the form of the adopted text while including the proposals of the expert from the United States of America
- We do not agree to postpone a decision on that subject. Substances of that kind have already been offered for transport, and if the existing provisions are not changed, this carriage would be

allowed under unsuitable and unsafe conditions. The issue has been discussed in depth and the improvement proposed by the expert from the United States of America solves the problems that were remaining after the last sub committee

Proposal

Add the text 2.4.2.3.1.1 (b) to read:

“(b) They are oxidising substances according to the classification procedure for Division 5.1 (see 2.5.2.1.1) except that mixtures of oxidising substances which contain 5.0% or more of combustible organic substances shall be classified as self-reactive substances according to the procedure defined in Note 3;”

Amend Note 3 to read as follows:

“Note 3: Mixtures of oxidising substances meeting the criteria of Division 5.1 which contain 5.0% or more of combustible organic substances, which do not meet the criteria mentioned in (a), (c), (d) or (e) above, shall be subjected to the self-reactive substance classification procedure. A mixture showing the properties of a self-reactive substance type B to F shall be classified as a self-reactive substance of division 4.1. A mixture showing the properties of a self-reactive substance type G according to the principle 2.4.2.3.3.2 (g) shall be considered for classification as a substance of division 5.1 (see 2.5.2.1.1).”
