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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
(Seventh session, 14-16 July 2004,
agenda item 2 (b))

Working group on substances, which in contact with water release toxic gases

Presented by the expert from France

1. Following the correspondence working group and the meeting held the 7 May in Paris a small group met the 14th of July to consider the classification criteria for substances, which in contact with water release toxic gases. Experts from Canada, France, Germany, the United States of America, CEFIC, EIGA, the UNECE and the OECD secretariat were present.

2. As defined in the mandate of the correspondence working group, the inclusion of the gas evolution rate in the criteria for classifying these substances was looked after.

3. The base document was INF 22 from France. This document doesn't provide a complete proposal ready for adoption but presents the principles according to which the evolution rate could be introduced in the criteria and gives some examples on how these principles could be applied in classification diagrams. It also points out some problems related to the measurement of gas emission.

On the principles

4. Some experts reminded on the history of the former groups who addressed this subject and said that the use of criteria set in the N5 test from the manual of test and criteria have been considered but not retained. But it was also noted that the measurement method and the values of the limits for the evolution rate were not automatically related and that for toxicity the relevant limits would be different than the ones defined for substances that release flammable gases.

5. Generally speaking it was recognized that it was worth to consider the influence of reactivity on the classification of these substances, but because no proposal was finalized some experts felt it was difficult to see if the level of protection would decrease or not due to the inclusion of the evolution rate in the criteria. Nevertheless it was pointed out that the diagram 4 proposed in INF22 was providing an option where the level of protection concerning category 3 substances was not reduced since the evolution rate would mainly influence the assignment in the different categories inside the toxicity range. This option would also provide a higher level of protection for substances having a high evolution rate.

6. No consensus was reached to adopt the principle of including the evolution rate, but it was agreed to keep it as a working item.

7. Some experts expressed the concern that this would delay the inclusion of these substances in the scope of the GHS, and said that the proposal presented by OECD in document 2003/9 of the last session could be adopted even if it was decided to continue the work on evolution rate criteria.

8. Some experts from the transport sector said that the TDG sub committee would address this anyway because of the note 4 in the proposal allowing for some authorities to take account of the evolution rate. After that the GHS sub committee could consider the work of the TDG sub committee and modify the criteria if deemed appropriate.

9. Other experts did not share this view because they felt it was not only a transport problem and it was contrary to the harmonisation goal of GHS, and changes would become more difficult once the provisions will be implemented. The comment was also made that the proposal in 2003/9 was not acceptable as such because it leads to inconsistency in the classification of these substances especially for mixtures (see UN/SCEGHS/6/INF6). According to this view the proposal in 2003/9 should not be adopted and work should continue in the frame of the GHS sub committee.

On the measurement method

10. Independently from the issue concerning the evolution rate it was pointed out that the proposal in 2003/9 did not provide guidance on how to decide when a substance releases toxic gases. The answer to this may be very different depending on the method used to detect the release of toxic gas.

11. Some experts proposed to define a “detection limit” to clarify this point. But because this problem was discovered late it was not possible to decide upon a precise method.

Future work

On the subject concerning evolution rate, two options are possible:

- Option 1: The GHS sub committee adopts the proposal in 2003/9 but invites the TDG subcommittee to work on the definition of criteria that include the evolution rate (reactivity). Then the GHS sub committee will consider the results of that work and decide upon the inclusion of these criteria in the GHS document.
- Option 2: The GHS sub committee doesn’t adopt any criteria for the time being and decides to continue the work on criteria including the evolution rate, the WAT substances will be included once this problem will be solved.

On the subject concerning the “detection limit”

The problem is pointed out to the sub committee who should decide whether it is important or not to define such a limit.

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