

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

Fifteenth session,
Geneva, 9-11 July 2008
Items 1, 2 (a), 4 and 5 (c) of the provisional agenda

Work of the Sub-Committee of Experts on the Transport of Dangerous Goods

Note by the secretariat

1. INTRODUCTION

1.1 This document contains the relevant conclusions and excerpts of the draft report of the Sub-Committee of Experts on the transport of dangerous goods (TDG Sub-Committee) on its thirty-third session, on matters of concern to the GHS Sub-Committee. These include the following items:

Physical hazards (agenda item 2)

- (a) Substances having explosives properties;
- (b) Desensitized explosives;
- (c) Classification of ammonium nitrate emulsions (ANEs);
- (d) Additional tests for the classification of 1.4S explosives and proposal for the review of UN Test series 7;
- (e) Flammable liquids;
- (f) Screening test for substances which may have explosive properties and consequential changes. Introduction of additional criteria

Implementation issues (agenda item 5(c))

- (a) Terms of reference for the working group on implementation issues
- (b) Implementation of GHS corrosivity criteria into Class 8 of the UN Recommendations
- (c) Implementation of the GHS for transport

Other issues (agenda item 4)

- (a) Proposal of amendment to the GHS pictogram for 1.4S explosives

1.2 The examination of all documents related to items (a) to (f) was assigned to the Working Group on explosives.

1.3 The Working Group on explosives met from 30 June to 3 July 2008, in parallel to 33rd session of the TDG Sub-Committee and discussed documents scheduled under agenda item 2 in UN/SCETDG/33INF.2. Mr. E. de Jong (the Netherlands) chaired the group.

1.4 Experts from Australia, Austria, Canada, France, Germany, Ireland, Japan, the Netherlands, Norway, Spain, Sweden, Switzerland, United Kingdom and United States of America participated, as well as representatives from CLEPA, COSTHA, ENA, ICCA, IME, ICPP and SAAMI.

1.5 The report of the Working Group of explosives was circulated to the TDG Sub-Committee as document UN/SCETDG/33/INF.79.

2. OUTCOME OF THE DISCUSSIONS

2.1 Physical hazards

(a) *Substances having explosive properties (agenda item 2)*

ST/SG/AC.10/C.4/2008/6 – ST/SG/AC.10/C.3/2008/43 (Germany)
UN/SCEGHS/15/INF.20 – UN/SCETDG/33/INF.71 (Germany)

There was no support for the proposal of the expert from Germany in ST/SG/AC.10/C.3/2008/43 (and informal document INF.71) for altering the sequence of the test series to be performed for assessing explosive properties, and the expert from Germany withdrew the proposal (see also item 8 (b) of the report of the working group on explosives).

(b) *Desensitized explosives (agenda item 2)*

ST/SG/AC.10/C.4/2008/9 – ST/SG/AC.10/C.3/2008/39 (Netherlands): Report of the informal working group on desensitized explosives

The TDG Sub-Committee, as a majority, approved the principle of additional work on the issue of desensitized explosives. Some experts, however, expressed reservations on the proposal to create a new division for desensitized explosives, given the repercussions this would have for the body of regulations as a whole, and took the view that this work was not a priority.

The Working Group on Explosives was invited to comment on this initial report by the informal working group on desensitized explosives, but not as a matter of priority, since the informal working group would have to hold more meetings in any event.

After consideration of the report of the Working Group on Explosives, the TDG Sub-Committee noted that the group did not discuss the proposals contained in the report of the informal Working Group on Desensitized Explosives (see item 6 of the report of the Working Group of explosives) and that more work will have to be carried out in accordance with the mandate decided by the GHS Sub-Committee (ST/SG/AC.10/C.4/26, para. 16).

It was agreed that the Working Group on desensitized explosives could meet during the next session in parallel to the plenary session. In this respect, the question of working methods in relation to the GHS Sub-Committee was raised again, and it was agreed that, although progress reports could be submitted to the GHS Sub-Committee for information, there was no need to seek endorsement of interim results by the GHS Sub-Committee. As for hazards to health and the environment, where OECD plays the role of focal point for the GHS,

proposals should be submitted to the GHS Sub-Committee only once they have been adopted by the TDG Sub-Committee.

(c) ***Classification of ammonium nitrate emulsions (ANEs) (agenda item 2)***

UN/SCEGHS/15/INF.12 – UN/SCEGHS/33/INF.42 (United Kingdom)

The Working Group supported the proposals from the United Kingdom, which were endorsed by the TDG Sub-Committee.

The proposed amendments to the GHS text adopted by the TDG Sub-Committee are as follows:

[Amend the title of Figure 2.1.4 to read: "Procedure for the classification of ammonium nitrate emulsion, suspension or gel (ANE)"]

Amend the final box in Figure 2.1.4 to read: "ANE substance/mixture shall be classified as a Category 2 oxidizing liquid or a Category 2 oxidizing solid; (Chapters 2.13 or 2.14)"]

(d) ***Additional tests for the classification of 1.4S explosives and proposal for the review of UN Test series 7 (agenda item 2)***

At its thirteenth session, the GHS Sub-Committee endorsed the recommendation of the TDG Sub-Committee to entrust the review of UN Test Series 7, as proposed in document ST/SG/AC.10/C.3/2007/30, to an inter-sessional informal working group lead by the expert from the United Kingdom (see ST/SG/AC.10/C.4/26 para. 20).

The Working Group on explosives took note of the report of the working group on Test Series 7 (UN/SCETDG/33/INF.54). Information regarding the organization of the next meeting of the informal working group would be communicated in due time.

(e) ***Flammable liquids (agenda item 2)***

ST/SG/AC.10/C.4/2008/5- ST/SG/AC.10/C.3/2008/42 (Germany)

The TDG Sub-Committee agreed that NOTE 2 to section 2.6.2 of the GHS had to be amended because test L.2 of section 32 of the Manual of Tests and Criteria is relevant only for substances with a flash point of more than 35 °C and not more than 60 °C. It should not be applied in the case of flammable liquids of category 4 for which no equivalent test method concerning sustained combustibility had been developed.

The TDG Sub-Committee did not agree however that such liquids with a flash point of more than 35 °C and not more than 60 °C meeting the criteria for non-sustained combustibility would have to be classified in category 4, since they were simply considered as non flammable liquids for certain regulatory purposes.

Should experts or organizations wish to apply similar exemptions on the basis of non sustained combustion for category 4 liquids for some regulatory purposes, a relevant proposal should be made to the GHS Sub-Committee which might then require the TDG Sub-Committee to develop suitable test methods.

(f) *Screening test for substances which may have explosive properties and consequential changes. Introduction of additional criteria (agenda item 2)*

At its fourteenth session, the GHS Sub-Committee endorsed the recommendation made by the TDG Sub-Committee of Experts that the proposed amendments to Chapter 2.1 of the GHS which were intended to assess the explosive properties of substances and mixtures on the basis of the results of Tests Series 1 needed further consideration and decided to forward back the question to the TDG Sub-Committee (see ST/SG/AC.10/C.4/28 paragraph 10).

The document submitted by ICCA to the thirty-third session of the TDG Sub-Committee ST/SG/AC.10/C.3/2008/40 was considered by the Working group of explosives.

In its document, ICCA discussed difficulties in performing classification tests on pharmaceuticals (cost of material, carcinogenicity, hazards to those performing tests, etc.) and proposed a screening test to assess detonation behaviour for new substances suspected of having explosive properties.

Members of the Working Group offered several comments and encouraged ICCA to submit a document for a future session.

2.2 Implementation issues

(a) *Terms of reference for the working group on implementation issues (agenda item 5(c))*

As suggested by the GHS Sub-Committee, the TDG Sub-Committee considered the draft terms of reference for an informal inter-sessional working group on GHS implementation and endorsed its terms of reference, noting in particular that if transport-related issues were identified by the group, they would be referred to it. The TDG Sub-Committee considered that representatives of non-governmental organizations should also be authorized to participate.

The Sub-Committee endorsed the terms of reference of the working group on implementation issues as contained in the document submitted by Australia (ST/SG/AC.10/C.3/2008/30).

(b) *Implementation of GHS corrosivity criteria into Class 8 of the UN Recommendations (agenda item 5 (c))*

ST/SG/AC.10/C.3/2008/48 (Netherlands)
INF.11 (AISE)
INF.17 (Netherlands)

The expert from the Netherlands clarified that he did not intend to extend the scope of Class 8 of the Model Regulations to substances which are irritating to skin. He said that the purpose of his proposal was to rationalize the current Class 8 classification criteria in order to better take account of the GHS text.

Most experts considered that the current criteria for Class 8 were consistent with the GHS building block approach. Nevertheless there was support for additional work, in particular for classification of mixtures.

Since several delegations said that they had not had sufficient time to consider INF.17 in detail, they were invited to provide comments to the expert from the Netherlands as soon as possible so that a new proposal could be prepared for the next session.

A member of the secretariat raised the question whether it would not be possible, for hazards to health and to the environment, to refer directly to the relevant parts of the GHS rather than

duplicating text, in the same way as this is done for physical hazards by reference to the Manual of Tests and Criteria. Several experts supported this approach.

(c) ***Implementation of the GHS for transport***

UN/SCETDG/33/INF.48 (Germany and United Kingdom)

The TDG Sub-Committee took note of the comments transmitted by the experts from Germany and the United Kingdom to UNITAR concerning a draft “Basic GHS course” (document circulated as INF.22 at the fourteenth session of the GHS Sub-Committee). It also noted that additional comments had been provided by the secretariat.

The representative of UNITAR informed the Sub-Committee that the final version of this course had not yet been released, but that it would be used in a pilot project for testing. This course is mainly intended for training in relation to the implementation of the GHS for supply and use of chemicals. She also informed the Sub-Committee that UNITAR was preparing another publication entitled “Understanding the GHS: A companion to the Purple Book (second revised edition)”.

The TDG Sub-Committee recalled that application of the existing and regularly updated provisions of the Model Regulations on the Transport of Dangerous Goods formed an important part of the implementation of the GHS, and endorsed the view of the experts from Germany and the United Kingdom that this should also form part of any material for training and support of the implementation of the GHS. Therefore it invited UNITAR, as GHS focal point for capacity building, to promote the implementation of the UN Model Regulations on the Transport of Dangerous Goods as an important part of the overall GHS implementation. The TDG Sub-Committee considered that it would be useful to obtain some sort of feedback on the success of delivering the GHS training courses, in particular as regards potential problems identified in the transport sector, as it could provide support in this respect.

The representative of UNITAR said that feedback would be provided to both sub-committees as deemed appropriate.

2.3 Other issues (agenda item 4)

(a) Proposal of amendment to the GHS pictogram for 1.4S explosives

In July 2007, SAAMI submitted a proposal for amendment to the GHS pictogram for 1.4S explosives to the TDG and GHS Sub-committees (ST/SG/AC.10/C.3/2007/13 and ST/SG/AC.10/C.4/2007/3).

At that time, both Sub-Committees agreed to defer the decision on the proposed amendments to allow for consultations at national level, bearing also in mind that the issue raised would be discussed again by the TDG Sub-Committee in July 2008, at the working group of explosives.

Noting that the document was not in the agenda of the Working Group of Explosives, the secretariat contacted the representative of SAAMI who confirmed that SAAMI had decided to withdraw the proposal.
