

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

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ISSUES RELATING TO THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Comments on ST/SG/AC.10/C.3/2009/15 and UN/SCETD/35/INF 3. Suggested text for
implementation of GHS criteria in Class 8 of the UN Model Regulations on the Transport of
Dangerous Goods (Netherlands)

Transmitted by the International Association of the Soap, Detergent and Maintenance Products
Industry (A.I.S.E.)

Introduction

1. A.I.S.E. has considerable concern about the proposals of the Netherlands to implement GHS corrosivity criteria into Class 8 of the UN Model Regulations. We agree with the points made by the United Kingdom in UN/SCETDG/35/INF.12 and wish to emphasise the following for further discussion.

Discussion

2. The amended text for 2.8.3.2 in 2009/15 includes “If consideration of alkali/acid reserve suggests the substance may not be corrosive despite the low or high pH value, then further testing shall be carried out to confirm this, preferably by use of an appropriate validated *in vitro* method.” But as has been pointed out pH gives no indication of degree of danger and neither does alkali/acid reserve. So if alkali/acid reserve does indicate corrosive further testing will be required to assign packing group.

3. If it were made clear that “data” in 2.8.3.2 included the Dangerous Goods List that would substantially reduce the need for testing.

Conclusion

4. A.I.S.E. invites the Sub-Committee not to make sweeping changes to Chapter 2.8 until UNSCEGHS has carried out its review of GHS Chapters 3.2 (skin corrosion/irritation) and 3.3 (serious eye damage).
