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 HARMONISED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Reaction on Information paper 12 of the United Kingdom and INF. 21 of AISE: 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 expert from the Netherlands

Introduction

1. In information paper 12 the expert from the United Kingdom expressed strong concerns about the Netherlands proposals to implement the GHS corrosivity criteria in Class 8 of the UN Model Regulations. The expert from AISE supports the concerns expressed by the United Kingdom.

2. In this information paper the expert from The Netherlands will present a reaction on the input from the expert from the United Kingdom and from AISE.

pH is not the perfect indicator of Corrosivity

3. We agree with the expert from the United Kingdom that the pH value is not the perfect indicator of the corrosive properties of a substance or mixture. However, the way the GHS classification criteria are set up, the pH is only one of the possible indicators which may be used if other information on the corrosive properties of the substance/mixture is not available.

4. In the case valid information from human experience or animal testing is available; this information prevails over the classification based on a pH measurement. The tiered testing and evaluation of skin corrosion potential for substances is illustrated in figure 2.8.1 of the proposed Chapter 2.8 (Annex of ST/SG/AC.10/C.3/2009/15).

5. The classification of mixtures is explained in paragraph 2.8.4 of the proposal. Also for mixtures classification based on pH is possible if no other information on the mixture exists.

Description of the corrosive reaction

6. The expert of the UK has some doubt whether corrosivity as defined in the UN GSH criteria is comparable with the criteria as presently used in the Transport Recommendations. In line with the UN GHS criteria paragraph 2.8.4.3.4.1 of the proposed chapter 2.8 describes; "A corrosive substance is a test material that produces destruction of skin tissue, namely, visible necrosis through the epidermis and into the dermis, in at least 1 of 3 test animals after exposure up to a 4-hour duration'.

GHS classification criteria enhance data availability

7. One of the driving forces of the harmonization of the classification criteria is the reduction for testing and evaluation of chemicals. The hazard information of the substance/mixture can be used throughout the life cycle of the substance. This benefit of the harmonization will only 'pay off' after implementation of the GHS criteria in the different (inter)national legal instruments, recommendations, codes and guidelines.

8. The GHS corrosivity classification criteria are already implemented in different (inter)national legal instruments throughout the world, for example Japan, New Zealand and the European Union. Alignment of the UN recommendations on TDG with the GHS will enable optimal use of available information on a substance or mixture. In this context it is not understood that "much more testing" as suggested by the expert of the United Kingdom in par. 2 of INF. 12 is necessary as compared with the present criteria in the UN Model Regulations.

9. The Expert of the United Kingdom suggests that the number of substances/mixtures classified based on corrosive properties may increase due to the implementation of the UN GHS criteria. However this increase, if any, will not be due to 'inappropriate classification' but due to increased availability of information on the properties of the substance/mixture.

Dangerous Goods List

10. The common practice regarding the substances/mixtures listed by name in the Dangerous Goods List. will not change by the implementation of the GHS classification criteria. The transport conditions as defined for listed substances/mixtures are leading.

Conclusion

11. The expressed concerns of the Expert of the United Kingdom and AISE are not shared by the Expert of the Netherlands. We do not believe that the alignment with the UN GHS criteria will dramatically change the transport classification, nor that transport should be treated as a special case in the chain of supply, use and transport

12. In line with the expressed unanimous support for the need for harmonisation with the UN GHS (report par. 108 of ST/SG/AC.10/C.3/68 December 2008 meeting), the alignment of the corrosivity criteria need not to await the editorial review as proposed by the UN GHS.

13. The use of available knowledge on the hazardous properties of the substances/mixtures will increase by the implementation of the GHS classification criteria for corrosivity allowing safe transport and handling.

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