

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

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Item 2 (b) of the provisional agenda

UPDATING OF THE THIRD REVISED EDITION OF THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Health hazards

Comments on UN/SCEGHS/18/INF.3

Transmitted by the European Chemical Industry Council (CEFIC)

Introduction

1. The United Nations Sub-Committee on the Transport of Dangerous Goods at its 36th session is discussing the harmonisation of the classification criteria of corrosive substances and mixtures. The harmonisation with the current classification criteria in GHS would cause an unjustified increase of restrictions for the transport of dangerous goods with no noticeable safety benefits.
2. Therefore we would like to raise this issue also with the UN Sub-Committee of experts on GHS to show, where the problems arise and to propose a possible solution.

General comments

3. The objectives and protection targets of the transport and supply/use sectors show differences and their existence should not be denied.
4. Especially in cases where GHS does not distinguish between 1A, 1B or 1C, CEFIC sees major problems using the GHS classification criteria also for transport. This e.g. is the case for extreme pH-values linked to category 1, which covers all 3 packing groups, i.e. I, II, and III. Therefore, the harmonisation is not helpful though the pH-value may give an indication for the degree of danger. However, in many cases the pH-value is not a scientifically founded classification criterion (see also ST/SG/AC.10/C.3/2009/50 and ST/SG/AC.10/C.3/2009/49, which are both supported by the chemical industry).

Example: Household multi -purpose descaler

Classified ingredients:

| | |
|-----------------------------|--|
| ≥ 10 - < 20% Citric acid | EU: Xi, R36; GHS skin: Cat.2 (irritant) |
| < 5 % Non-ionic surfactants | EU: Xi, R36/38; GHS skin: - |

Physical state: liquid (aqueous solution)

pH-value: 1,5

Current classification for the mixture EU: -

5. According to the decision logic: GHS skin Cat.1 ⇒ TDG class 8, Packing group I (PG I because of the lack of differentiation between 1A, 1B, 1C in the classification based on the pH value).
6. Even if there were valid *in vitro* test data available, the pH value would overwrite this information, according to table 3.2.1 of the GHS.
7. Therefore our proposal would be to link the extreme pH values with skin corrosive Category 2. This would guarantee that users are protected and solve the problem for the transport.
8. The above example clearly shows that the classification will become too severe or that unnecessary test efforts will be generated for many substances and mixtures.
9. Due to the lacking 1A, 1B or 1C subdivisions, PG I might have to be applied without further testing. But PG I will have intolerable consequences for most products e.g. no possibility of use of intermediate bulk containers (IBCs), very small packagings in air transport, prohibition for passenger aircraft, strong storage conditions, no acceptance in the market.
10. These consequences are in conflict with the fact that most of these classifications are not reflecting the real hazard potential and offer no increase in safety.
11. CEFIC already tabled document UN/SCETDG/36/INF.18 for the 36th session of the Sub-committee of Experts on TDG providing another alternative solution to integrate the extreme pH value criterion into the transport regulations in an appropriate way (see also UN/SCETDG/35/INF.33 which is again offered for discussion by the experts).

Proposal:

12. What is expressed above shows that further consideration needs to be given to the classification criteria for corrosivity based on extreme pH values in order to solve the problems identified. CEFIC would thus welcome the above proposals to be taken into account by the correspondence group on the revision of Chapters 3.2 and 3.3 and is prepared to take part to any discussion on this issue.
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