

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

7 June 2010

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Item 2 (a) of the provisional agenda

Updating of the third revised edition of the Globally Harmonized System
of Classification and Labelling of Chemicals (GHS): Physical hazards

Change of wording for note on flammable aerosols

Transmitted by the expert from Sweden

Background

1. The GHS has a separate hazard class “Flammable Aerosols” for aerosols with flammable properties, Chapter 2.3 of the Purple Book.
2. In the document from the Federation of European Aerosol Associations (FEA), ST/SG/AC.10/C.4/2007/4, put forward at the 13th session of the Sub-Committee, it was proposed to insert a note reading: “*Aerosol dispensers not submitted to flammability classification procedures in this chapter shall be classified as extremely flammable.*”
3. The proposal of FEA was slightly modified and then accepted by the Sub-Committee. According to the report from that meeting, ST/SG/AC.10/C.4/26, it was agreed to introduce a note reading: “**NOTE:** *Aerosols not submitted to the flammability classification procedures in this Chapter should be classified as extremely flammable in Category 1.*”
4. The note in the GHS Purple Book Rev. 3, which was inserted in section 2.3.2.2, now reads “**NOTE:** *Aerosols not submitted to the flammability classification procedures in this Chapter should be classified as extremely flammable (Category 1).*” This is in agreement with the text in the draft amendments to the second revised edition of the GHS, as put forward by the secretariat for the 16th session of the Sub-Committee, ST/SG/AC.10/C.4/2008/14.

Problem

5. The term “extremely flammable” that is used in the note as above is not defined in Chapter 2.3 “Flammable Aerosols”. There is no such thing as an “extremely flammable aerosol” according to the GHS-terminology. This poses problems in the transformation of the GHS into legal texts such as the European Union’s so called CLP-Regulation (Regulation (EC) 1272/2008).
6. It is considered that a reference to the hazard class itself and the related category should be legally more appropriate and therefore it is proposed to change the Note as outlined below.

Proposal

7. In Chapter 2.3 section 2.3.2.2 change the wording of the NOTE to read:

*“NOTE: Aerosols not submitted to the flammability classification procedures in this Chapter should be classified as **flammable aerosols, Category 1.**”*

Consequences

8. The change of wording has no further consequences. It may be regarded as editorial in the GHS, although it is important in the legal text introducing the GHS in various countries.
