Differences in classification and labelling of dichloromethane and ferrosilicon (with 30% or more but not less than 90% silicon)

Transmitted by the expert from the Russian Federation
Differences in classification and labelling of dichloromethane and ferrosilicon (with 30% or more but less than 90% silicon)

Introduction

Ferrosilicon with 30% or more but less than 90% silicon

According to UN Recommendations on the Transport of dangerous goods this product has an additional hazard division 6.1. It is caused by ferrosilicon ability to emit toxic gases in contact with water, but this product can not straightly be related to division 6.1 by its toxicity characteristics. GHS doesn't consider such hazard class, so it arouses problems in labelling.

Dichloromethane

According to UN Recommendations on the Transport of dangerous goods this product has hazard division 6.1. It is caused by dichloromethane ability to emit toxic gases while burning, but this product can not straightly be related to division 6.1 by its toxicity characteristics. GHS doesn't consider such hazard class, so it arouses problems in labelling.

Substantiation

According to UN Recommendations on the Transport of dangerous goods it is necessary to label mentioned products with "skull and crossbones" symbol, however according to GHS these products do not meet the classification criteria and do not require to be labelled with the respective symbol.

Conclusion

There are no criteria considering the following hazards:
- ability of chemical product to emit toxic gases in contact with water;
- ability of chemical product to emit toxic gases while burning.
Proposals

a. To expand category 3 (inhalation toxicity) by following references:
   "Specify a brief hazard characteristic "Emit toxic gases in contact with water" for Ferrosilicon with 30% or more but less than 90% silicon".
   "Specify a brief hazard characteristic "Emit toxic gases while burning" for Dichloromethane".

b. To discuss a possibility to create an additional hazard category considering an ability of chemical products to emit toxic gases in contact with water or while burning.

Dmitry Skobelev,
Director, expert SC GHS

Alexander Kozlov,
Deputy Director, expert SC GHS