

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 (a) of the provisional agenda

Updating of the Globally Harmonized System of Classification
and Labelling of Chemicals (GHS) – Physical hazards

Substances and mixtures with explosive properties which are exempted from classification as explosives

Transmitted by the experts from the United States of America and from
Germany¹

Background

1. According to the classification procedure for explosives, substances and mixtures can be exempted from classification as explosives based on their packaging and the according results in test series 6. In this case their explosive properties as determined by test series 2 are not communicated at all (one example - as also indicated in previous documents - is musk xylene, see UN Manual of Tests and Criteria, Chapter 10.5 and especially Figure 10.8).
2. It is important that existing explosive properties are communicated to users of those substances and mixtures. And although the issue of classification of explosive properties is included in the program of work, reaching consensus will take quite some time and according amendments of the classification system will probably be implemented in the long-term only.
3. We therefore would like to propose a solution which could serve in the interim until a long-term solution is found and agreed. This proposal is supposed to be presented in a formal document at a later stage after taking into account comments and amendments of the Sub-Committee.
4. Further considerations are outlined after the proposal at the end of this document.
5. The Sub-Committee is invited to take note of the proposal and of the further considerations and to comment as appropriate.

Proposal

6. In section 2.1.3 re-number the NOTE after Table 2.1.2 to NOTE 1.

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session.

7. In section 2.1.3 add a new Note under Table 2.1.2 with the following text:

NOTE 2: *Substances and mixtures with a positive result in test series 2 which are exempted from classification as explosives (based on their packaging and the according results in test series 6) still have explosive properties. Their explosive properties shall be communicated via the Safety Data Sheet.*

Further considerations

8. In the long-term, we do not believe the Note, as proposed above, is sufficient because a substance or mixture that is exempted from classification as an explosive may not be classified at all. In that case, a Safety Data Sheet would normally not be necessary and the above requirement would not apply.

9. Furthermore, one of the important principles of the GHS is that hazardous properties be communicated via the labelling, which in turn is based on classification. In our view, it should be the aim not to deviate from this principle, especially not for a hazard which is considered to be comparatively severe.

10. Therefore, we continue to aim at an according amendment of the classification procedure and invite other experts to indicate whether they also see a need to allow for adequate hazard communication based on intrinsic (explosive) properties for the supply and use sector.
