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 December 2011**

Twenty–second session
Geneva, 7 (p.m) – 9 December 2011
Item 4 (c) of the provisional agenda
Cooperation with other bodies or international organizations: Corrosivity criteria

Work of the joint TDG-GHS group on corrosivity criteria

Transmitted by the expert from the United Kingdom on behalf of the working group

1. The joint TDG-GHS working group on corrosivity criteria held its first meeting on 7 December from 14.30 to 17.30. The draft agenda proposed in Annex 1 to informal document -18/Add.1 was adopted, with the addition of a new item ("General discussion") under item 1.

2. The outcome of the discussions was as follows:

   (a) Hazard classification for transport purposes should be dissociated from transport conditions (i.e.: assignment of packing groups);

   (b) Bearing in mind the significant downstream consequences of changing transport conditions (e.g.: changing from Packing group II to packing group I) for corrosive substances, transport classification should be revised only when it can be demonstrated that the current classification does not provide the adequate level of safety;

   (c) Acknowledging that some substances are being classified differently for transport and for supply/use, most experts considered that the first step to be taken should be to identify the source of these differences, (e.g. different test methods used (in vitro vs in vivo testing); different interpretation of tests results; classification based on human experience only, on grandfather clauses, etc) bearing also in mind that TDG classifications have been agreed internationally while supply and use classifications are agreed only at national or regional level.

   (d) regarding classification of mixtures, it was explained that the current provisions in the UN Model Regulations allowed the use of alternative methods to testing for classification purposes (e.g.. use of bridging principles) and that from a legal point of view this was being allowed by competent authorities provided that the classification derived from these alternatives methods did not lower the level of safety offered by the prescribed testing methods. They suggested that should this option not be clear from the current provisions of the UN Model Regulations, an amendment to the text in Chapter 2.8 might be needed;

(e) Regarding the differences in the definition of “skin destruction” in Chapter 2.8 of the UN Model Regulations and that in Chapter 3.2 (paragraph 3.2.2.4.1) of the GHS, there was agreement on that, despite the different wording used, both definitions lead to the same interpretation, since they were both linked to the results obtained using the same OECD Tests Guidelines. However, for the sake of harmonization, most experts considered that the text in the UN Model Regulations should be aligned with that of the GHS;

(f) The representative from ICCA suggested that a list containing current classifications for transport and supply and use sectors be published, on the understanding that such list would be helpful to identify existing differences in classification results.

(g) Most experts considered that the aspiration was one classification for a substance or mixture for both transport and supply/use and based on hazard, with Packing Groups for transport assigned on the basis of hazard and risk. The immediate next steps would include further case studies to understand the reasons behind the different classifications that currently arise.