



**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
Transport of Dangerous Goods****Forty-first session**

Geneva, 25 June–4 July 2012

Item 10 of the provisional agenda

**Issues relating to the Globally Harmonized System
of Classification and Labelling of Chemicals (GHS)****Sub-Committee of Experts on the Globally Harmonized
System of Classification and Labelling of Chemicals****Twenty-third session**

Geneva, 4–6 July 2012

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 Germany, the United States of
America, and Canada¹****Introduction**

1. During the last meeting the proposal to introduce a note in the GHS for substances and mixtures with explosive properties which are exempted from classification as explosives was discussed by the TDG Sub-Committee and the GHS Sub-Committee. Both sub-committees agreed to the principle of the proposal and welcomed an official document for the next session.
2. The necessity and justification for the proposed note was outlined in detail in informal documents SCETDG/40/INF.17 and SCEGHS/22/INF.14.
3. Furthermore, the TDG Sub-Committee recommended an amendment to the proposed wording (see annex III to ST/SG/AC.10/C.3/80). The GHS-Sub-Committee welcomed the proposal and made further suggestions (see informal document SCEGHS/22/INF.14/Rev.1).

¹ In accordance with the programme of work of the Sub-Committee for 2011–2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

4. This document contains the finalized proposal with a slightly modified wording and an explanation/justification for the proposed modifications of wording.

Proposal

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

6. 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 in the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, Part I, section 12, which are exempted from classification as explosives (based on their packaging and the results in test series 6 in the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, Part I, section 16) still have explosive properties. The user should be informed of these intrinsic explosive properties because they have to be considered for handling – especially if the substance or mixture is removed from its packaging or is repackaged – and for storage. For this reason, the explosive properties of the substance or mixture should be communicated in Section 2 (Hazard identification) and Section 9 (Physical and chemical properties) of the Safety Data Sheet in accordance with Table 1.5.2, and other sections of the Safety Data Sheet, as appropriate.*

Justification

7. The experts from Germany, the United States of America, and Canada are proposing a slightly modified wording for the note. This modification takes into account the proposals (or the underlying intentions) made during the last meetings of both Sub-Committees.

8. Addition of the reference to the UN Recommendations was taken up as proposed.

9. Upon reflection the experts from Germany, the United States of America, and Canada have concluded that it is not appropriate to add "or other properties". The Note is supposed to be applied to substances and mixtures fulfilling the following two conditions:

- Positive result in test series 2
- Negative result in test series 6

Regardless of the type of substance (e.g. "normal" explosive or desensitized explosive), the note refers to exemption based on test series 6 and hence is always based on the type of packaging and the properties of the substance in that packaging. The impression that other properties could play a role might result from two of the examples given in the table in informal documents SCETDG/40/INF.17 and SCEGHS/22/INF.14, in which substances that would be covered by the note are listed. Two of the substances are wetted with water. Nevertheless, their exemption from the class of explosives is based on test series 6 and the results in an appropriate transport packaging and not on their dilution with water because even in that dilution they have explosive properties based on test series 2 (see the table in informal documents SCETDG/40/INF.17 and SCEGHS/22/INF.14).

10. Furthermore, the second sentence is slightly modified because neither the "once" (as contained in the TDG proposal) nor the "in case" (as contained in the GHS-Proposal) are appropriate. The user of a substance should generally be informed about its properties and not only "once" or "in case" he is unpacking the substance (i.e. the conditions for exemption from classification as explosive are no longer met). Information about intrinsic properties to the user via the Safety Data Sheet (SDS) are not linked to any conditions and generally should be given regardless of what the user is planning to do with the substance.

11. A short reference to handling and storage is added because intrinsic explosive properties are important for these and have to be considered.
12. A table showing the different versions of the Note is added in the Annex to this document for easy comparison.

Annex

(English only)

<p>Original proposal in 2011 by DE, US, CA (Inf.14)</p>	<p>Changes by TDG (TDG-Report) Changes to column 1: underlined</p>	<p>Changes by GHS (Inf.14/Rev.1) Text in brackets was not decided Changes to column 2: underlined</p>	<p>New proposal in July 2012 Explanation see above</p>
<p>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. The user may not be aware of these potential explosive properties once the substance or mixture is removed from the transport packaging or is repackaged. To communicate the potential hazards in accordance with Table 1.5.2, the explosive properties of the substance or mixture should be communicated in Section 2 (Hazard Identification) and Section 9 (Physical and Chemical Properties) of the Safety Data Sheet, and other sections of the Safety Data Sheet, as appropriate.</p>	<p>Substances and mixtures with a positive result in test series 2 in the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, Part I, section 12, which are exempted from classification as explosives (based on their packaging or other properties) and the results in test series 6 in the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, Part I, section 16) still have explosive properties. The user may not be aware of these potential explosive properties once the conditions for exemption from classification as explosive are no longer met. To communicate the potential hazards in accordance with Table 1.5.2, the explosive properties of the substance or mixture should be communicated in Section 2 (Hazard Identification) and Section 9 (Physical and Chemical Properties) of the Safety Data Sheet, and other sections of the Safety Data Sheet, as appropriate.</p>	<p>Substances and mixtures with a positive result in test series 2 in the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, Part I, section 12, which are exempted from classification as explosives (based on their packaging /or other properties) and the results in test series 6 in the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, Part I, section 16) still have explosive properties. The user should be informed of these explosive properties in case the substance or mixture no longer meets the conditions for exemption /, e.g./ because the substance or mixture is removed from its packaging or it is repackaged. For this reason, the explosive properties of the substance or mixture should be communicated in Section 2 (Hazard identification) and Section 9 (Physical and chemical properties) of the Safety Data Sheet in accordance with Table 1.5.2, and other sections of the Safety Data Sheet, as appropriate.</p>	<p>Substances and mixtures with a positive result in test series 2 in the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, Part I, section 12, which are exempted from classification as explosives (based on their packaging and the results in test series 6 in the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, Part I, section 16) still have explosive properties. The user should be informed of these intrinsic explosive properties because they have to be considered for handling – especially if the substance or mixture is removed from its packaging or is repackaged – and for storage. For this reason, the explosive properties of the substance or mixture should be communicated in Section 2 (Hazard identification) and Section 9 (Physical and chemical properties) of the Safety Data Sheet in accordance with Table 1.5.2, and other sections of the Safety Data Sheet, as appropriate.</p>

