



**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****Fiftieth Session**

Geneva, 28 November-6 December 2016

Item 6 of the provisional agenda

New proposals for amendments to the Model**Regulations on the Transport of Dangerous Goods****Classification of mixtures of environmentally hazardous
substances****Transmitted by the expert from the United States of America¹****Introduction**

1. The Model Regulations include in 2.9.3.4.6.5.1 a method for classification of environmentally hazardous substances (EHS) mixtures with ingredients without any usable information. Included in this paragraph is a requirement for an additional statement that “x percent of the mixture consists of ingredient(s) of unknown hazards to the aquatic environment.” This statement is applicable to GHS, but is irrelevant for transport purposes as it is implemented via the GHS label or Safety Data Sheet (SDS) and not communicated on the transport document. For clarity, it is proposed that this text be removed from the Model Regulations for Transport.

Discussion

2. The GHS classification criteria for EHS in 4.1.3.6 requires mixtures with ingredients without any usable information be classified based on the known ingredients with an additional statement that “x percent of the mixture consists of ingredient(s) of unknown hazards to the aquatic environment.” The GHS further states “the competent authority can

¹ In accordance with the programme of work of the Sub-Committee for 2015–2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15).

decide to specify that the additional statement is communicated on the label or on the SDS or both, or to leave the choice of where to place the statement to the manufacturer/supplier.”

3. The Model Regulations, in 2.9.3.4.6.5.1, refer to this additional statement; however there is no related transport requirement. The inclusion of this text in the UN Model Regulations appears to have been an oversight when the GHS-based classification provisions for substances hazardous to the aquatic environment were incorporated within the Model Regulations for Transport.

4. As the requirement in question is appropriately addressed under the relevant GHS label and SDS provisions, it is proposed that this text be removed from the Model Regulations for Transport. No text relevant to the classification assessment itself is proposed for amendment or deletion.

Proposal

5. Revise 2.9.3.4.6.5.1 to read as follows:

In the event that no usable information on acute and/or chronic aquatic toxicity is available for one or more relevant ingredients, it is concluded that the mixture cannot be attributed (a) definitive hazard category(ies). In this situation the mixture shall be classified based on the known ingredients only. ~~with the additional statement that: “x percent of the mixture consists of ingredients(s) of unknown hazards to the aquatic environment.”.~~
