Review of Chapter 2.1 of the GHS

Transmitted by the expert from Canada

Introduction

1. This informal paper proposes additional draft text to the document ST/SG/AC.10/C.3/2016/47 – ST/SG/AC/C.4/2016/10 transmitted by the Sporting Arms and Ammunition Manufacturers’ Institute (SAAMI) on proposed revisions to GHS section 2.1.3.

2. While Canada is supportive of the additional work being done to revise Chapter 2.1 as a whole for addressing the treatment of explosives within the GHS through various on-going initiatives, it supports SAAMI’s proposals of above mentioned document that focuses on section 2.1.3. Additional proposals are being made for addressing the exemption of very low hazard explosives articles, which are also relevant to the work being done by the Informal Correspondence Group lead by Sweden.

Considerations

3. Explosives (substances and articles) of division 1.4 are assigned in Compatibility Group S if they are so packaged or designed that any hazardous effects arising from accidental functioning are confined within the package unless the package has been degraded by fire, in which case all blast or projection effects are limited to the extent that they do not significantly hinder fire-fighting or other emergency response efforts in the immediate vicinity of the package.

4. Explosives that are “so packaged” to be assigned a division 1.4 with compatibility group S should be subjected by Competent Authorities to Test Series 6 type (d) – unconfined package test to confirm the classification. The 1.4S entries whose classification depends upon special packaging are subject to special provision 347. N.O.S. entries are also subject to special provision 347.

5. Other explosives that are “so packaged” to be assigned a division 1.4 with compatibility group S include articles that are not subject to special provision 347, but that are subject to the packing instruction P133 for which trays are required to prevent a propagation between small articles such as primers used in small arms cartridges.
6. Other than explosives articles and substances that are referred to in sections 4 and 5, explosives that are assigned to division 1.4 with compatibility group S are very low hazard explosives that do not have hazardous effects in case of an accidental functioning, whether they are in their transport package or outside of the package. A hazard statement that would communicate their low hazard would be more appropriate. The list of such UN entries, that can be associated to specific articles are as follows: 0012, 0014, 0055, 0070, 0105, 0110, 0131, 0173, 0174, 0193, 0337, 0345, 0368, 0373, 0404, 0405, 0432, 0454, 0506, 0507.

Proposal

7. Canada is proposing to amend the following text to the Note under Table 2.1.2 as proposed by SAAMI:

*Inner packagings of Division 1.4 explosives in a form classified for transport but absent the transport packaging may be labelled according to Table 2.1.2.*

with this text:

*GHS labelling for explosives that are in their transport packaging or not and assigned division 1.4 with compatibility group S may be labelled as per Table 2.1.2 for these UN entries: 0012, 0014, 0055, 0070, 0105, 0110, 0131, 0173, 0174, 0193, 0337, 0345, 0368, 0373, 0404, 0405, 0432, 0454, 0506, 0507. For other explosives assigned division 1.4 with compatibility group S, GHS labelling is also as per Table 2.1.2 but with a differentiation between explosives that are in their transport packaging, or in a form not classified for transport.*

Accordingly, it is also proposed to amend Table 2.1.2 as follows:

<table>
<thead>
<tr>
<th>Unstable Explosive</th>
<th>Division 1.1</th>
<th>Division 1.2</th>
<th>Division 1.3</th>
<th>Division 1.4</th>
<th>Division 1.4, compatibility group S</th>
<th>Division 1.5</th>
<th>Division 1.6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Symbol</td>
<td>Exploding bomb</td>
<td>Exploding bomb</td>
<td>Exploding bomb</td>
<td>Exploding bomb; or 1.4 on orange background*</td>
<td>1.4 on orange background*</td>
<td>1.5 on orange background*</td>
<td>1.6 on orange background*</td>
</tr>
<tr>
<td>Signal word</td>
<td>Danger</td>
<td>Danger</td>
<td>Danger</td>
<td>Warning</td>
<td>Warning</td>
<td>Danger</td>
<td>No signal word</td>
</tr>
<tr>
<td>Hazard statement</td>
<td>Unstable</td>
<td>Explosive; mass explosion hazard</td>
<td>Explosive; severe projection hazard</td>
<td>Explosive; fire; blast or projection hazard</td>
<td>Low hazard</td>
<td>May mass explode in fire</td>
<td>No hazard statement</td>
</tr>
</tbody>
</table>

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