

**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals**

26 November 2018

**Sub-Committee of Experts on the Transport
of Dangerous Goods**

Fifty-fourth session

Geneva, 26 November-4 December 2018

Item 7 (e) of the provisional agenda

**Issues relating to the Globally Harmonized System
of Classification and Labelling of Chemicals:
miscellaneous**

**Sub-Committee of Experts on the Globally Harmonized
System of Classification and Labelling of Chemicals**

Thirty-sixth session

Geneva, 5-7 December 2018

Item 3 (a) of the provisional agenda

**Classification criteria and related hazard communication:
Work of the Sub-Committee of Experts on the Transport
of Dangerous Goods (TDG) on matters of interest to the
GHS Sub-Committee**

**Additional proposed amendment to the classification criteria
for flammable liquids in Chapter 2.6 of the GHS**

**Transmitted by the International Paint and Printing Ink Council
(IPPIC)**

1. This informal document supplements and modifies the proposal by IPPIC in working document ST/SG/AC.10/C.3/2018/94 (TDG) / ST/SG/AC.10/C.4/2018/22 (GHS).
2. As noted by the expert from Germany in their earlier document ST/SG/AC.10/C.3/2016/62–ST/SG/AC.10/C.4/2016/13 (for the fiftieth session of the TDG Sub-Committee and thirty-second session of the GHS Sub-Committee respectively), the proposed language in IPPIC's document ST/SG/AC.10/C.3/2018/94 / ST/SG/AC.10/C.4/2018/22 may give rise to some confusion. Specifically, in paragraph 9 the words “need not be classified in Category 3” in the proposed revision 2.6.2.2 could imply reclassifying a Category 3 liquid up to Category 4. However, such a reclassification would not be considered appropriate since the flash point does not change.
3. To avoid this confusion, IPPIC submits the alternative proposal: “Liquids with a flash point of more than 35 °C need not be classified as flammable if negative results have been obtained in the sustained combustibility test L.2 of Part III, section 32 of the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria.”
4. This alternative proposal would allow for declassification of Category 4, as well as Category 3, flammable liquids. Declassification of Category 4 flammable liquids is described in paragraph 7 of this document and requires a modification to test L.2 to introduce test temperatures appropriate to liquids with a flash point above 60 °C. The relevant adaptation of the test already exists in the United States' Hazardous Materials Regulations (HMR).
5. In the HMR, Appendix H to Part 173 Method of, Testing for Sustained Combustibility, paragraph (h) of the procedure states: “In the case of a material which has a flash point above 60 °C and below 93 °C, if sustained combustion is not found at a test temperature of 5 °C above its flash point, repeat the complete procedure with new test portions, but at a test temperature of 20 °C above its flash point.”
6. IPPIC proposes the relevant amendment to test L.2 in the UN Manual of Tests and Criteria to clarify the test with regard to the alternative proposal for amendment of 2.6.2.2.

Proposal

7. Amend section 2.6.2 of the GHS as follows (additions are underlined, deletions in ~~striketrough~~):

“2.6.2 Classification criteria

2.6.2.1 A flammable liquid is classified in one of the four categories for this class according to the following table:

Table 2.6.1: Criteria for flammable liquids

Category	Criteria
1	Flash point < 23 °C and initial boiling point ≤ 35 °C
2	Flash point < 23 °C and initial boiling point > 35 °C
3	Flash point ≥ 23 °C and ≤ 60 °C
4	Flash point > 60 °C and ≤ 93 °C

2.6.2.2 Liquids with a flash point of more than 35 °C need not be classified as flammable if negative results have been obtained in the sustained combustibility test L.2 of Part III, section 32 of the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria.

NOTE 1: Gas oils, diesel and light heating oils in the flash point range of 55 °C to 75 °C may be regarded as a special group for some regulatory purposes.

~~*NOTE 2: Liquids with a flash point of more than 35 °C and not more than 60 °C may be regarded as non-flammable liquids for some regulatory purposes (e.g. transport) if negative results have been obtained in the sustained combustibility test L.2 of Part III, section 32 of the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria.*~~

~~*NOTE 3: Viscous flammable liquids such as paints, enamels, lacquers, varnishes, adhesives and polishes may be regarded as a special group for some regulatory purposes (e.g. transport). The classification or the decision to consider these liquids as non-flammable may be determined by the pertinent regulation or competent authority.*~~

~~*NOTE 4: Aerosols should not be classified as flammable liquids. See Chapter 2.3.*~~

8. Amend test L.2, Part III, section 32 of the Manual of Tests and Criteria as follows (additions are underlined, deletions in ~~striketrough~~):

“32.5.2.3.8 If sustained combustion, interpreted in accordance with 32.5.2.4, is not found at a test temperature of 60.5 °C, repeat the complete procedure with new test portions, but at a test temperature of 75 °C. In the case of a material which has a flash point above 60 °C and below 93 °C, if sustained combustion, interpreted in accordance with 32.5.2.4, is not found at a test temperature of 5 °C above its flash point, repeat the complete procedure with new test portions, but at a test temperature of 20 °C above its flash point.”

9. In section 2.6.4.1, amend footnote 2 to decision logic 2.6 as follows to reflect the wording of new section 2.6.2.2 in paragraph 7 above (deletions in ~~strike through~~):

^{“2} *Liquids with a flash point of more than 35 °C ~~and not more than 60 °C~~ may be regarded as non-flammable liquids ~~for some regulatory purposes (e.g. transport)~~ if negative results have been obtained in the sustained combustibility test L.2 of Part III, section 32 of the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria.”*
