

# UN/SCETDG/21/INF.34

## UN/SCEGHS/3/INF.9

**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  
(Twenty-first session, 1-10 July 2002,  
agenda item 12)

Sub-Committee of Experts on the Globally  
Harmonized System of Classification and  
Labelling of Chemicals  
(Third session, 10-12 July 2002, agenda item 2)

**Classification criteria for aerosols**  
**Draft amendments to the third revised edition of the Manual of Tests and Criteria**

**Information paper transmitted by the European Aerosol Federation (FEA)**

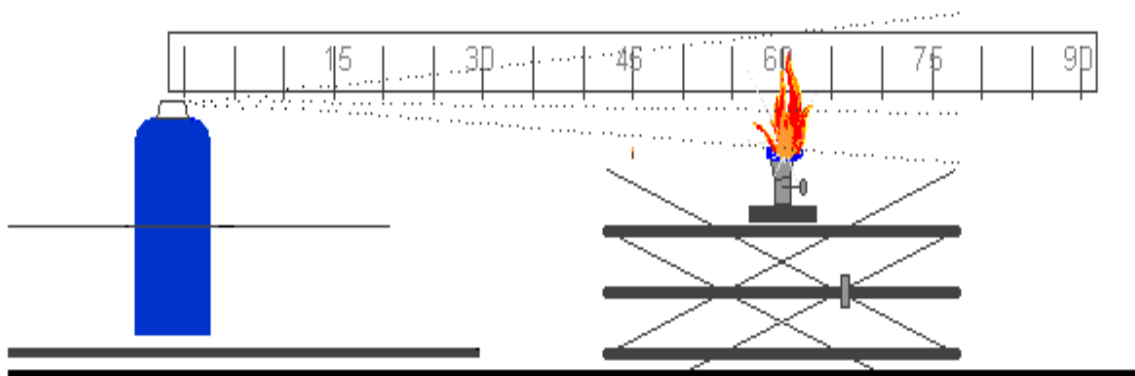
The Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals agreed at its second session that Annex 11 of the GHS could be deleted provided that the tests are included in the Manual of Tests and Criteria (ST/SG/AC.10/C.4/4, para.32).

FEA fully supports this choice and thanks the secretariat for the preparation of the proposal of amendments to the Manual of tests and Criteria for this purpose (ST/SG/AC.10/C.3/2002/48-ST/SG/AC.10/C.4/2002/10).

FEA wishes to comment on document ST/SG/AC.10/C.3/2002/48-ST/SG/AC.10/C.4/2002/10:

1) page 11 – figure 31.4.1:

The figure 31.4.1 is not in line with the text. The actuator's orifice should be placed on "zero". FEA proposes to replace the figure 31.4.1 with the following one:



2) page 15 – para.31.5.3.3:

This paragraph should be deleted under para 31.5. and transferred to para 31.4. which deals with the ignition distance test. The document ST/SG/AC.10/C.3/38/Add.2 (Annex 3) states in paragraph 11 on test methods – “It was also agreed that, only in the case of the ignition distance test, it should be necessary to repeat the test in the position of the dispenser most likely to result in a positive result, when the result of the test in the position in which the dispenser is designed to be used gives a negative result.”

3) page 15 – para. 1.5.4.4:

For consistency, FEA proposes a slight modification in the paragraph. FEA proposes “...in the ignition distance test (31.4) is classified as flammable ...”.

4) page 18 – para. 1.6.4.2:

A typing error appears to have been made in the English version of paragraph 31.6.4.2 compared with ST/SG/AC.10/C.3/38/Add.2 (Annex 3), point 8. FEA proposes that the sentence should actually read "The aerosol product shall be classified as extremely flammable if the flame height is 20 cm or more and the flame duration is 2 s or more.". The unit m (meters) after the figure 20 is incorrect.

5) page 2 – FEA proposes to clarify the constraints on classification in order to avoid unnecessary testing of products given that in many cases the producer can easily foresee the result.

FEA proposes to add a NOTE under para 31.2.1. as follows:

NOTE: Aerosol dispensers not submitted to flammability classification procedures in this sub section shall be classified as extremely flammable.

6) FEA asks that the Manual of Tests and Criteria be reprinted this year to incorporate these new tests and other changes.

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