

**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

Thirty-fourth session
Geneva, 1-9 December 2008
Item 11 of the provisional agenda

**ISSUES RELATING TO THE GLOBALLY HARMONIZED SYSTEM OF
CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)**

Note by the secretariat

For information of the Sub-Committee, the secretariat reproduces hereafter two documents regarding the classification of aerosols for flammability which have submitted to the sixteenth session of the Sub-Committee of Experts on the GHS:

Annex 1: Document ST/SG/AC.10/C.4/2008/25 (Sweden)

Annex 2: Information document UN/SCEGHS/16/INF.11 (FEA)

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DANGEROUS GOODS AND ON THE GLOBALLY
HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

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

Sixteenth session
Geneva, 10 -12 (a.m) December 2008
Item 2 (a) of the provisional agenda

**UPDATING OF THE SECOND REVISED EDITION OF THE GLOBALLY HARMONIZED
SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)**

Physical hazards

Clarification for the classification of aerosols for flammability

Transmitted by the expert from Sweden¹

Background

1. The GHS has a separate hazard class “flammable aerosols” for aerosols with flammable properties (see Chapter 2.3 of the GHS).

¹ In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.4/24, Annex 2 and ST/SG/AC.10/34, para. 14).

2. Based on the content of flammable component(s), on the heat of combustion and/or on the outcome of specified tests it is decided whether or not any given aerosol should be classified as a flammable aerosol (see Chapter 2.3 of the GHS).

3. The flammable component(s) of an aerosol may itself (themselves) be classified in the hazard classes “flammable gas”, “flammable liquid” or “flammable solid” according to the criteria in Chapters 2.2, 2.6 or 2.7 of the GHS.

Problem

4. A substance or mixture classified as a flammable gas, flammable liquid or flammable solid contained in an aerosol dispenser may thus result in the aerosol dispenser being classified as a flammable aerosol. This at first glance results in double classification for the same hazardous property, which should be avoided.

5. It has therefore to be made clear in the GHS that aerosol dispensers should not be classified as flammable gases, flammable liquids or flammable solids. They should be subjected to the procedure for flammable aerosols only, and classified and labelled accordingly.

Proposals

6. In Chapter 2.2 (flammable gases) amend NOTE 2 under Table 2.2.1 to read as follows:

“NOTE 2: Aerosols should not be classified as flammable gases. See Chapter 2.3.”

7. In Chapter 2.6 (flammable liquids) insert a NOTE 4 under Table 2.6.1 to read as follows:

“NOTE 4: Aerosols should not be classified as flammable liquids. See Chapter 2.3.”

8. In Chapter 2.7 (flammable solids) insert a NOTE 2 under Table 2.7.1 to read as follows:

“NOTE 2: Aerosols should not be classified as flammable solids. See Chapter 2.3.”

Consequentially change the word “NOTE” to read “NOTE 1” under Table 2.7.1.

UN/SCEGHS/16/INF.11

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UPDATING OF THE SECOND REVISED EDITION OF THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Comments on document ST/SG/AC.10/C.4/2008/25

Transmitted by the European Aerosol Federation (FEA)

Introduction

1. The expert from Sweden submitted document ST/SG/AC.10/C.4/2008/25 to clarify the classification of flammable aerosols. FEA supports the approach and suggests building on the proposed legal clarification.
2. The classification criteria which were developed by the UN Sub-Committee of Experts for the Transport of Dangerous Goods already consider the physical hazards of the components. So aerosols do not fall additionally under the scope of chapter 2.2 (flammable gases), 2.6 (flammable liquids) and 2.7 (flammable solids) of the GHS.
3. The legal clarification should also consider another physical hazard class i.e. gases under pressure (chapter 2.5). By definition, aerosol dispensers are non-refillable containers containing a gas under pressure and consequently are labelled with precautionary statements P251: "Pressurized container: Do not pierce or burn, even after use." and P410+P412: "Protect from sunlight. Do not expose to temperatures exceeding 50°C/122°F". So aerosol dispensers should not additionally fall under chapter 2.5.
4. FEA proposes to include a single note under chapter 2.3 (flammable aerosols) which confirm that aerosols do not fall additionally within the scope of chapters 2.2 (flammable gases), 2.5 (gases under pressure), 2.6 (flammable liquids) and 2.7 (flammable solids) of the GHS.

Proposal

2.3.2.1 Replace “*NOTE*” by “*NOTE 1*”

At the end of the text add “*NOTE 2: Aerosol dispensers do not fall additionally within the scope of chapters 2.2 (flammable gases), 2.5 (gases under pressure), 2.6 (flammable liquids) and 2.7 (flammable solids).*”
