

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 Globally
Harmonized System of Classification
and Labelling of Chemicals

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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)

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).**”
