

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

20 June 2014

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

**Forty-fifth session**

Geneva, 23 June – 02 July 2014

Item 11 (g) of the provisional agenda

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

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

**Twenty-seventh session**

Geneva, 02 – 04 July 2014

Item 3 (c) of the provisional agenda

**Classification criteria and hazard communication:  
Work of the TDG-GHS working group on corrosivity  
criteria**

**Input for the work of the intersessional joint TDG-GHS  
working group on corrosivity criteria**

**Transmitted by the European Aerosol Federation (FEA)**

**Introduction**

1. Due to a conflicting meeting at the European Commission (Brussels), FEA is not able to be present at the meeting of the intersessional joint TDG-GHS working group on corrosivity criteria on 2 July 2014.
2. Reference is made to informal document INF.32 (45<sup>th</sup> session) or informal document INF.9 (27<sup>th</sup> session).
3. The proposal indicates that substances and mixtures classified as Class 8A and Class 8 without sub-classification are to be assigned to packing group I.
4. This would have a serious consequence for some aerosols because Special Provision 63 – which applies to all aerosols – does not only cover the hazard class flammability.
5. Special Provision 63 (e) sets requirements for aerosols whose content meet the criteria for classification of other hazards including Class 8. Thus under the proposal, aerosols that are classified as Corrosive Category 1A for supply will be classified as Corrosive Class 8A for transport.
6. Special Provision 63 (f) specifically prohibits the transport of aerosols with contents assigned packing group I for corrosivity.
6. The consequence is that some aerosols that are currently safely transported would be prohibited from being transported under the proposed scheme.
7. The working group is invited to take into account this issue in further developing the proposal.