

## 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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Item 3 (b) of the provisional agenda

**Classification criteria and related hazard communication:  
review of Chapter 2.1**

## **On the provisions for non-Class 1 explosive articles in new GHS Chapter 2.1 – amendments to the proposals in UN/SCETDG/57/INF.33-UN/SCEGHS/39/INF.19**

### **Transmitted by the expert from Sweden on behalf of the Informal Correspondence Group for the review of GHS Chapter 2.1**

1. Informal document UN/SCETDG/57/INF.33-UN/SCEGHS/39/INF.19 contains proposed additional provisions to handle those products that fulfill the definition to be comprised by the GHS hazard class Explosives but are not classified as explosive (Class 1) for transport. That document was discussed at the virtual meeting of the Working Group on Explosives (EWG) and the proposals were endorsed in principle, see paragraph 15 of the EWG-report in INF.38 (57<sup>th</sup> session).
2. In the EWG discussions, the Secretariat remarked that using the term “product” in this context could be misleading and have unintended consequences, as it is used in the GHS to address “chemical products” covering substances and mixtures, while the products concerned are mainly, if not even exclusively, explosive articles.
3. In addition, as also indicated in informal document UN/SCETDG/57/INF.33-UN/SCEGHS/39/INF.19, it was noted that the proposed note on how to handle products that are classified in transport Class 6 needs to be restricted to division 6.1 (toxic substances) so that division 6.2 (infectious substances) are not included in its scope, as it has no GHS counterpart.

### **Discussion**

4. In discussions within the Informal Correspondence Group (ICG) it was suggested to replace the term “products consisting of or containing explosives” with “explosive articles”, despite some of these explosive articles being directed to other hazard classes than Explosives. Furthermore, it is suggested to specify that the note to paragraph 2.1.1.2.3.1 applies only to “division 6.1 within Class 6”.
5. The packing groups used in the UN Model Regulations generally correspond to the categories used in the GHS, and this generally allows straight translation from a transport classification to a corresponding GHS classification. However, while the articles listed in Table 1 of Annex II to informal document UN/SCETDG/57/INF.33-UN/SCEGHS/39/INF.19 have packing groups assigned to them, articles are normally not assigned packing groups, see provision 2.0.1.3 of the Model Regulations. So in the general case, no GHS category can be assigned to explosive articles by straight translation from a packing group. Therefore it is suggested to add “where available” in paragraph 2.1.1.2.3.1 and in the affiliated note. It could additionally be considered to add another note to further clarify what to do when straight translation from the transport classification to a GHS classification down to the category level is not possible.

6. In addition, some further clarifying amendments are suggested:
- The reference to “according to 2.1.1.2.3” appears superfluous as the two provisions where this is used are sub-paragraphs to paragraph 2.1.1.2.3. Therefore it is suggested to remove this text.
  - The reference to section 2.1.1.3.4 in point (c) is suggested to be taken out of the brackets, as brackets should preferably not occur in provisions.
  - Clarification is proposed to be added to the note that by “the same conditions as stated in 2.1.1.2.3.1” conditions (a) to (c) of that provision are meant.
  - The texts of paragraph 2.1.1.2.3.1 and the affiliated note is suggested to be streamlined, so a change of order of the wording is proposed.

## Proposal

7. The amended proposal for the additional provisions in informal document UN/SCETDG/57/INF.33-UN/SCEGHS/39/INF.19 are as below, with text to be deleted in bold strike-through and text to be added in bold underlined. A clean version of the text is shown in the annex to this document.

“2.1.1.2.3 For ~~products consisting of or containing explosives which~~ explosive articles that are assigned a specific UN-number in a class other than Class 1 according to the Dangerous Goods List of the *UN Model Regulations*, the following applies:

2.1.1.2.3.1 ~~Products according to 2.1.1.2.3 which~~ Explosive articles that are assigned a specific UN-number in Class 2, 3, 4 or 5 are classified in the GHS hazard class and, where available, category corresponding to the transport classification, and excluded from the hazard class explosives, provided that:

- (a) ~~the product is~~ they are in the transport configuration; or
- (b) the transport classification does not depend on a particular configuration; or
- (c) ~~the product is~~ they are in use, (see 2.1.1.3.4).

*NOTE: Subject to approval from the competent authority, ~~products according to 2.1.1.2.3 which~~ explosive articles that are assigned a specific UN-number in division 6.1 within Class 6 or in Class 8 may be classified in the ~~corresponding~~ corresponding to the transport classification, and excluded from the hazard class explosives, provided that ~~the same~~ conditions (a) to (c) as stated in of 2.1.1.2.3.1 are met.*

2.1.1.2.3.2 ~~Products according to 2.1.1.2.3 which~~ Explosive articles that are assigned a specific UN-number in Class 9 are classified as explosives in Sub-category 2C, provided that:

- (a) ~~the product is~~ they are in the transport configuration; or
- (b) the transport classification does not depend on a particular configuration; or
- (c) ~~the product is~~ they are in use, (see 2.1.1.3.4).”

## Additional possible proposal

8. In order to clarify how to proceed in case a packing group is not assigned to the article, and hence a corresponding GHS category is not immediately available, it could be considered to add an additional note like the below. (It should be noted that this idea came up rather late in the discussions around this document and has not been circulated within the ICG.)

*“NOTE: According to the UN Model Regulations, articles are normally not assigned packing groups and hence a category within the corresponding GHS hazard class cannot always be assigned on this basis. Expert judgement should be used to assign an appropriate category in these cases, taking into account the GHS classification of the substances or mixtures contained.”*

## Annex

### Amended provisions for new GHS Chapter 2.1 for explosive articles assigned another class than Class 1 for transport

“2.1.1.2.3 For explosive articles that are assigned a specific UN-number in a class other than Class 1 according to the Dangerous Goods List of the *UN Model Regulations*, the following applies:

2.1.1.2.3.1 Explosive articles that are assigned a specific UN-number in Class 2, 3, 4 or 5 are classified in the GHS hazard class and, where available, category corresponding to the transport classification, and excluded from the hazard class explosives, provided that:

- (a) they are in the transport configuration; or
- (b) the transport classification does not depend on a particular configuration; or
- (c) they are in use, see 2.1.1.3.4.

*NOTE: Subject to approval from the competent authority, explosive articles that are assigned a specific UN-number in division 6.1 within Class 6 or in Class 8 may be classified in the GHS hazard class and, where available, category corresponding to the transport classification, and excluded from the hazard class explosives, provided that conditions (a) to (c) of 2.1.1.2.3.1 are met.*

2.1.1.2.3.2 Explosive articles that are assigned a specific UN-number in Class 9 are classified as explosives in Sub-category 2C, provided that:

- (a) they are in the transport configuration; or
  - (b) the transport classification does not depend on a particular configuration; or
  - (c) they are in use, see 2.1.1.3.4.”
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