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

6 November 2023

Sub-Committee of Experts on the Transport of Dangerous Goods

Sixty-third session
Geneva, 27 November- 6 December 2023
Item 10 (b) of the provisional agenda
Issues relating to the Globally Harmonized System of Classification and Labelling of Chemicals: Simultaneous classification in physical hazards and possible combination of hazards

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

Forty-fifth session
Geneva, 6-8 December 2023
Item 2 (b) of the provisional agenda
Work on the Globally Harmonized System of Classification and Labelling of Chemicals: Simultaneous classification in physical hazards and precedence of hazards

Informal working group on combinations of physical hazards: Status report and amendment to the notes for aerosols

Transmitted by the expert from Germany on behalf of the informal working group

I. Status report

1. For the terms of reference of this informal working group, please refer to document ST/SG/AC.10/C.4/2018/21, as amended in document ST/SG/AC.10/C.4/72, paragraph 74.

2. The informal working group has finalized its considerations on the combinations of aerosols and chemicals under pressure with other physical hazard classes. The result is presented in informal document UN/SCEGHS/45/INF.5-UN/SCETDG/63/INF.7. However, in the web-meeting of the group in October 2023 one issue in that document was picked up again and the group would like to amend the document slightly as presented in section II. below.

3. Since the June/July 2023 sessions of the TDG and GHS sub-committees, the group had two web-meetings in which the group continued to assess the individual combinations of physical hazards in depth. Currently, the focus is especially on the combinations of:

(a) Explosives with Flammable solids;

(b) Aerosols and Chemicals under pressure with other physical hazard classes;

(c) Self-reactives and Organic peroxides with other physical hazard classes; and

(d) Corrosive to metals with other physical hazard classes.

4. The next web-meeting of this informal working group is foreseen for January 2024.

II. Amendment to the proposal for aerosols in informal documents UN/SCEGHS/45/INF.5-UN/SCETDG/63/INF.7

5. In its web-meeting in October 2023 the group decided to amend the proposal in paragraph 18 by removing the last (underlined) sentence in note 1 which reads “The applicability of other physical hazard classes is established by classification of the contents as a whole.”. Consequently, also paragraph 17 has to be amended. It is proposed that

paragraphs 17 and 18 UN/SCEGHS/45/IN.5-UN/SCETDG/63/INF.7 are amended as follows:

> "17. The questions as posed in paragraphs 11 and 12 above are applied to aerosols equivalently.
>
> 18. Notes 1 and 2 would then read as follows:
>
> **NOTE 1:** Depending on their contents, aerosols may fall within the scope of other hazard classes than those mentioned in 2.3.1.1.2.
>
> **NOTE 2:** Some sectors, e.g. transport, may have other specific regulations regarding the applicability of other hazard classes. For aerosols, see special provision 63 of the *Model Regulations*."

6. The reason is that discussions in the group showed that the sentence "The applicability of other physical hazard classes is established by classification of the contents as a whole." (originally proposed at the end of note 1) was confusing because it was unclear whether the reference to "as a whole" would be applicable to health hazards as well or not. The original intent of that sentence was only to clarify that – as opposed to classification as aerosol – the container does not play a role for classification in other hazard classes. As this is quite obvious, the helpful information that the sentence was supposed to convey was deemed minor compared to the confusion it might cause.

7. Instead, the group considers adding information on the specifics of aerosols (namely that the container plays a role for their classification) should be mentioned at another place, for example in the section on definitions and general considerations. The group will come back to that issue at a later time point.