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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**

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| **Sub-Committee of Experts on the Transport  of Dangerous Goods** | **Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals** |
| **Sixty-fourth session** | **Forty-sixth session** |
| Geneva, 24 June-3 July 2024 | Geneva, 3-5 July 2024 |
| 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** | 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** |

Proposal for further clarification on the hazard class “Aerosols”   
in the Globally Harmonized System

Transmitted by the European Aerosol Federation (FEA)[[1]](#footnote-2)\*

I. Introduction

1. At its forty-fifth session, the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (GHS Sub-Committee) acknowledged that the improvement of the text of note 2 below table 2.3.1 of the GHS fell outside the current scope of the work of the informal working group on combinations of physical hazards and invited FEA to consider taking the lead on this topic and submit a proposal.

2. FEA agrees it makes sense to clarify the text of chapter 2.3 at once.

3. This document builds on document ST/SG/AC.10/C.3/2024/4− ST/SG/AC.10/C.4/2024/1 and related informal documents INF.4−INF.3 transmitted by the expert from Germany on behalf of the informal working group on combinations of physical hazards.

4. The proposal below has been prepared in cooperation with the Household and Commercial Products Association (HCPA) of the United States of America.

II. Discussion

5. It was informally discussed that “***NOTE 2***: *Aerosols containing more than 1 % flammable components or with a heat of combustion of at least 20 kJ/g, which are not submitted to the flammability classification procedures in this chapter should be classified as aerosols, Category 1.”* is deemed to be normative and thus should be in the main text rather than in a note. The text could also be more precise.

III. Proposal for the GHS

6. In chapter 2.3, FEA proposes to amend note 2 below table 2.3.1 (Criteria for aerosols*)* as follows (new text is shown **bold, underlined**, deleted text is marked as ~~strikethrough~~):

“**2.3.1.2.2** ~~NOTE 2:~~ Aerosols containing more than 1 % flammable components or with a heat of combustion of at least 20 kJ/g **that have not been tested according to 2.3.1.2.1, third indent**~~, which are not submitted to the flammability classification procedures in this chapter~~ should be classified as aerosols, Category 1.”

IV. Consequential amendment

7. If option 1 for aerosols in document ST/SG/AC.10/C.3/2024/4− ST/SG/AC.10/C.4/2024/1 is preferred and this proposal agreed, consequently the proposed “NOTE 2” will be below the new paragraph 2.3.1.2.2 and should be renamed “NOTE”.

8. If option 2 for aerosols in document ST/SG/AC.10/C.3/2024/4− ST/SG/AC.10/C.4/2024/1 is preferred and this proposal agreed, there is no consequential amendment.

V. Request to the sub-committees

9. The TDG and GHS sub-committees are invited to consider the proposal for aerosols in paragraph 6 of this document in connection with the proposals submitted by the informal working group on combinations of physical hazards.

1. \* A/78/6 (Sect. 20), table 20.5. [↑](#footnote-ref-2)