

## 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

3 July 2024

Forty-sixth session

Geneva, 3-5 July 2024

Items 2 (a), 2 (b) and 2 (j) of the provisional agenda

## Work of the Sub-Committee of Experts on the Transport of Dangerous Goods (TDG) on matters of interest to the GHS Sub-Committee

### Note by the secretariat

At its sixty-fourth session, the Sub-Committee of Experts on the Transport of Dangerous Goods (TDG Sub-Committee) considered matters of interest to the GHS Sub-Committee under items 2 and 10 of its agenda<sup>1</sup> (“explosives and related matters” and “Issues relating to the Globally Harmonized System of Classification and Labelling of Chemicals” respectively). The outcome of these discussions is summarized below.

The full report of the Explosives Working Group (EWG) containing the summary of the discussion on all the matters considered by the group as well as its recommendations was circulated during the TDG Sub-Committee session as informal document INF.67.<sup>2</sup>

The recommendations of the EWG for corrections and amendments to the GHS are reproduced in the annex to this document.

## Outcome of the discussions at the TDG Sub-Committee

### A. GHS agenda item 2 (a)

#### 1. Report of the informal correspondence group on the revision of subsection 51.4 of the Manual of Tests and Criteria regarding the burning rate

Document: ST/SG/AC.10/C.4/2024/7 (China) - ST/SG/AC.10/C.3/2024/41

Informal documents: GHS/INF.4 - TDG/INF.5 (China)

*TDG/INF.67, paragraph 13 (report of the EWG)*

#### *Conclusion by the Sub-Committee*

76. The Sub-Committee recognized the outcome of the discussions in the EWG on the proposed amendments to the Manual of Tests and Criteria. It was agreed to resume discussion at a future session based on a refined proposal.

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<sup>1</sup> ST/SG/AC.10/C.3/127 and -127/Add.1 (<https://unece.org/info/Transport/Dangerous-Goods/events/385416>)

<sup>2</sup> <https://unece.org/transport/documents/2024/06/informal-documents/report-working-group-explosives-ewg>

*(Ref. Doc: ST/SG/AC.10/C.3/2024/R.1/Add.8 - Draft report from the TDG Sub-Committee on its sixty-fourth session, as amended)*

**2. Corrections and amendments to the Model Regulations, the Globally Harmonized System and the Manual of Tests and Criteria**

Document: ST/SG/AC.10/C.4/2024/8 (AEISG) - *ST/SG/AC.10/C.3/2024/52*

*Informal document: TDG/INF.67, paragraph 13 and annex 2, amendment 6*

***Conclusion by the Sub-Committee***

The Sub-Committee endorsed the recommendation from the Explosives Working for the proposed change to the definition in chapter 2.8, as amended (see the annex to this document for the proposed text).

For adopted texts on the proposed amendments/corrections to the Manual of Tests and Criteria and the Model Regulations refer to report of the informal working group on explosives and the adopted texts as reflected in the draft report from the TDG Sub-Committee on its sixty-fourth session *ST/SG/AC.10/C.3/2024/R.2/Add.1*.

**B. GHS agenda item 2 (b)**

**1. Proposal for clarifications on the combinations of aerosols and chemicals under pressure with other hazard classes in the Globally Harmonized System**

Document: ST/SG/AC.10/C.4/2024/1 (Germany) - *ST/SG/AC.10/C.3/2024/4*

*Informal document: INF.3 (TDG/INF.4) Germany*

***Conclusion by the Sub-Committee***

108. The Sub-Committee supported in principle the proposals (including the related options 1 and 2) in paragraphs addressing chemicals under pressure and aerosols in the document from Germany. Following an exchange of views among experts, the TDG Sub-Committee decided to leave the decision on the preferred options proposed in the document to the discretion of the GHS Sub-Committee.

*(Ref. Doc: ST/SG/AC.10/C.3/2024/R.1/Add.11 - Draft report from the TDG Sub-Committee on its sixty-fourth session)*

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

Document: ST/SG/AC.10/C.4/2024/2 (FEA) - *ST/SG/AC.10/C.3/2024/5*

***Conclusion by the Sub-Committee***

109. The TDG Sub-Committee considered that the proposed amendment would improve understanding of the criteria and supported the proposed amendments to the GHS, subject to the decision by the GHS Sub-Committee.

*(Ref. Doc: ST/SG/AC.10/C.3/2024/R.1/Add.11 - Draft report from the TDG Sub-Committee on its sixty-fourth session)*

**3. Aerosols – Alignment of special provision 63 with special provision 362**

Document: ST/SG/AC.10/C.4/2024/3 (FEA) - *ST/SG/AC.10/C.3/2024/6*

***Conclusion by the Sub-Committee***

110. The TDG Sub-Committee noted general support on the amendments to the Manual of Tests and Criteria, proposed in paragraph 7 of the document. On the proposal in paragraph 6, the Sub-Committee expressed support in principle but

considered that additional clarification was needed on the text before it could be considered for adoption. Several delegations pointed out that with the proposed amendments, the scope of the special provision would become unclear, as it regards classification based on the overall contents of the aerosol (including the propellant) or on contents other than the propellant. It was also noted that some editorial improvements may be needed and that a more recent version of standard ISO/FDIS 13943 for determination of the chemical heat of combustion was available. The representative of FEA welcomed the feedback provided and indicated his intention to revise the proposal accordingly, taking also into account any advice that the GHS Sub-Committee may wish to provide during the discussion of this topic at its forty-sixth session.

*(Ref. Doc: ST/SG/AC.10/C.3/2024/R.1/Add.11 - Draft report from the TDG Sub-Committee on its sixty-fourth session)*

#### **4. Status report for the GHS informal working group on combinations of physical hazards**

*Informal document:* INF.11 (Germany on behalf of the IWG)- TDG/INF.22

##### ***Conclusion by the Sub-Committee***

107. The Sub-Committee took note of the progress report of the informal working group. Experts interested to participate in the work of the informal working group were invited to contact the expert from Germany (Ms. Cordula Wilrich).

*(Ref. Doc: ST/SG/AC.10/C.3/2024/R.1/Add.11 - Draft report from the TDG Sub-Committee on its sixty-fourth session)*

### **C. GHS agenda item 2 (j)**

#### **1. Consideration of nitrocellulose mixtures in chapter 2.17 (Desensitized explosives) of the Globally Harmonized System, section 5.1 of the Manual of Tests and Criteria and special provision 393 of the Model Regulations**

*Document:* ST/SG/AC.10/C.4/2024/5 (AEISG) - ST/SG/AC.10/C.3/2024/24

*Informal document:* TDG/INF.67, paragraph 19 (report of the EWG)

##### ***Conclusion by the Sub-Committee***

111. The Sub-Committee noted the outcome of the discussion on this topic by the Explosives Working Group and endorsed its recommendation (see informal document INF.67, para. 19). The representative of AEISG welcomed the offer from SAAMI and the expert from the United States of America to work together on a revised proposal aiming at finding a suitable solution to address the issues raised within this biennium. The Sub-Committee noted that AEISG intended to submit a revised proposal for the next session.

*(Ref. Doc: ST/SG/AC.10/C.3/2024/R.1/Add.11 - Draft report from the TDG Sub-Committee on its sixty-fourth session)*

**2. Consideration of amendments to chapter 2.17 (Desensitised explosives) of the Globally Harmonized System and section 51 of the Manual of Tests and Criteria**

*Document:* ST/SG/AC.10/C.4/2024/6 (AEISG) - ST/SG/AC.10/C.3/2024/25

*Informal document:* TDG/INF.67, para. 20 and annex 2, amendment 8 (Chair of the EWG)

***Conclusion by the Sub-Committee***

112. The Sub-Committee endorsed the recommendation by the EWG and and, pending endorsement by the GHS Sub-Committee at its forty-sixth session, provisionally adopted the amendments to section 51 of the Manual of Tests and Criteria as amended by the explosives working group in informal document INF.67, annex 2, amendment 8 (see annex....). The Sub-Committee also endorsed the recommendation by the Explosives Working Group on the proposal for amendment to chapter 2.17 of the GHS.

The recommended amendment to chapter 2.17 as proposed by the explosives working group is reproduced in the annex to this document for consideration by the GHS Sub-Committee.

*(Ref. Doc: ST/SG/AC.10/C.3/2024/R.1/Add.11 - Draft report from the TDG Sub-Committee on its sixty-fourth session)*

**3. Proposal for clarification to the aerosol category 3 criteria**

*Informal document:* INF.16 (United States of America) - TDG/INF.57

113. The Sub-Committee supported the proposal in principle. The expert from the United States of America invited experts who commented to send their written comments to Ms. Janet Carter in order to prepare an official document for the next session and to take account of the feedback received.

*(Ref. Doc: ST/SG/AC.10/C.3/2024/R.1/Add.11 - Draft report from the TDG Sub-Committee on its sixty-fourth session)*

## Annex

### Proposed amendments to the GHS recommended by the explosives working group

#### Chapter 2.8

In paragraph 2.8.1.1, amend the end of the second sentence to read as follows:

“... as explosives, organic peroxides or oxidizing [liquids or solids](#).”

*(For background information, refer to section A.2 in this document)*

#### Chapter 2.17

In chapter 2.17 of the GHS amend the note in 2.17.2.2 as follows:

**“NOTE:** *Phlegmatized explosives which do not meet the criteria of 2.17.2.2 should not be classified as [a desensitized explosive and should be classified as an explosive in accordance with chapter 2.1 of the GHS](#). ~~explosives (see chapter 2.1)~~.”*

*(For background information, refer to section C.2 in this document)*

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