

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

16 September 2024

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

Sixty-fifth session

Geneva, 25 November-3 December 2024

Item 10 (c) of the provisional agenda

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

Miscellaneous

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

Forty-seventh session

Geneva, 4-6 December 2024

Item 2 (k) of the provisional agenda

**Work on the Globally Harmonized System of
Classification and Labelling of Chemicals:**

Other matters

Proposal for clarification to the aerosol category 3 criteria

Transmitted by the expert from the United States of America

This informal document sets out the changes proposed in document ST/SG/AC.10/C.3/2024/111- ST/SG/AC.10/C.4/2024/17.

Existing (unchanged) text is shown in black, with new text is shown in blue and deleted text is shown in ~~red strikethrough~~.

Amendments to table 3.2.1 “Criteria for aerosols”

Option 1

Table 2.3.1: Criteria for aerosols

Category	Criteria
1	1) Any aerosol that contains $\geq 85\%$ flammable components (by mass) and has a heat of combustion of ≥ 30 kJ/g; or 2) Any aerosol that dispenses a spray that, in the ignition distance test, has an ignition distance of ≥ 75 cm; or 3) Any aerosol that dispenses a foam that, in the foam flammability test, has a) a flame height of ≥ 20 cm and a flame duration of ≥ 2 s, or b) a flame height of ≥ 4 cm and a flame duration of ≥ 7 s
2	1) Any aerosol that dispenses a spray that, based on the results of the ignition distance test, does not meet the criteria for Category 1, and which has (a) a heat of combustion of ≥ 20 kJ/g, or (b) a heat of combustion of < 20 kJ/g along with an ignition distance of ≥ 15 cm, or (c) a heat of combustion of < 20 kJ/g and an ignition distance of < 15 cm along with either, in the enclosed space ignition test, - a time equivalent of ≤ 300 s/m ³ , or - a deflagration density of ≤ 300 g/m ³ ; or 2) Any aerosol that dispenses a foam that, based on the results of the aerosol foam flammability test, does not meet the criteria for Category 1, and which has a flame height of ≥ 4 cm and a flame duration of ≥ 2 s.
3	1) Any aerosol that contains $\leq 1\%$ flammable components (by mass) and that has a heat of combustion < 20 kJ/g; or 2) Any other aerosol that contains $> 1\%$ (by mass) flammable components or and which has a heat of combustion of ≥ 20 kJ/g but which, based on the results of the ignition distance test, the enclosed space ignition test, or the aerosol foam flammability test, does not meet the criteria for Category 1 or Category 2

Option 2

Table 2.3.1: Criteria for aerosols

Category	Criteria
1	<ol style="list-style-type: none"> 1) Any aerosol that contains $\geq 85\%$ flammable components (by mass) and has a heat of combustion of ≥ 30 kJ/g; or 2) Any aerosol that dispenses a spray that, in the ignition distance test, has an ignition distance of ≥ 75 cm; or 3) Any aerosol that dispenses a foam that, in the foam flammability test, has <ol style="list-style-type: none"> a) a flame height of ≥ 20 cm and a flame duration of ≥ 2 s, or b) a flame height of ≥ 4 cm and a flame duration of ≥ 7 s
2	<ol style="list-style-type: none"> 1) Any aerosol that dispenses a spray that, based on the results of the ignition distance test, does not meet the criteria for Category 1, and which has <ol style="list-style-type: none"> (a) a heat of combustion of ≥ 20 kJ/g, or (b) a heat of combustion of < 20 kJ/g along with an ignition distance of ≥ 15 cm, or (c) a heat of combustion of < 20 kJ/g and an ignition distance of < 15 cm along with either, in the enclosed space ignition test, <ul style="list-style-type: none"> - a time equivalent of ≤ 300 s/m³, or - a deflagration density of ≤ 300 g/m³; or 2) Any aerosol that dispenses a foam that, based on the results of the aerosol foam flammability test, does not meet the criteria for Category 1, and which has a flame height of ≥ 4 cm and a flame duration of ≥ 2 s.
3	<ol style="list-style-type: none"> 1) Any aerosol that contains $\leq 1\%$ flammable components (by mass) and that has a heat of combustion < 20 kJ/g; or 2) Any aerosol that dispenses a spray that contains $> 1\%$ (by mass) flammable components and which has a heat of combustion of $< \geq 20$ kJ/g but which, based on the results of the ignition distance test, or the enclosed space ignition test, or the aerosol foam flammability test, does not meet the criteria for Category 1 or Category 2. 3) Any aerosol that dispenses a foam but which, based on the results of the aerosol foam flammability test, does not meet the criteria of Category 1 or Category 2.