



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 Transport of Dangerous Goods

Sixty-fifth session

Geneva, 28 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*

Introduction

1. At the forty-sixth session, the United States of America presented in informal document INF.16 an inconsistency between category 2 criteria and category 3 criteria which could create confusion for the classifier. The criteria as written allows certain aerosols with a heat of combustion ≥ 20 kilojoules per gram (kJ/g) to be classified in category 3, while in category 2 the criteria state that aerosols that dispense a spray with a heat of combustion ≥ 20 kJ/g are to be classified in category 2.
2. At the forty-sixth session, several delegates expressed support for the proposal as they considered it would help further clarify the criteria. Also, at the forty-sixth session, the representative from the European Aerosol Federation (FEA) indicated that a simpler solution would be to just include in category 3 aerosols that do not meet category 1 or category 2 should be category 3.
3. This document, together with informal document INF.4 (TDG) – INF.3 (GHS), presents for the consideration of the Sub-Committee two options (option 1 preferred) to revise the criteria for aerosol category 3.

* A/78/6 (Sect. 20), table 20.5.



Proposal

Option 1

4. Replace category 3 in table 2.3.1 (Criteria for aerosols) with the following:

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; or2) Any other aerosol that does not meet the criteria for Category 1 or Category 2.
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Option 2

5. Replace category 3 in table 2.3.1 (Criteria for aerosols) with the following:

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; or2) Any aerosol that dispenses a spray that contains $> 1\%$ (by mass) flammable components and which has a heat of combustion of < 20 kJ/g but which, based on the results of the ignition distance test, or the enclosed space ignition 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.
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Request to the sub-committees

6. The TDG and GHS sub-committees are invited to consider amendment to category 3 and endorse one of the options in paragraphs 4 or 5.
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