

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

3 October 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

**Proposed amendment to the proposals in document
ST/SG/AC.10/C.3/2024/111- ST/SG/AC.10/C.4/2024/17 for
clarification to the aerosol category 3 criteria in the GHS**

**Transmitted by the expert from the United Kingdom of Great Britain
and Northern Ireland and the European Aerosol Federation (FEA)**

I. Introduction

1. The United Kingdom and the European Aerosol Federation (FEA) supports in principle the proposed clarification to the aerosols category 3 criteria as the use of detailed “>” and “≥” in the current category 3 criteria in the GHS can create confusion for the classifier, as detailed in ST/SG/AC.10/C.3/2024/111–ST/SG/AC.10/C.4/2024/17.

2. The proposal presented as option 1 in paragraph 4 of document ST/SG/AC.10/C.3/2024/111–ST/SG/AC.10/C.4/2024/17 (as detailed in colour in INF.4 (TDG) - INF.3 (GHS)), also proposes to delete the existing reference to the appropriate types of testing in accordance with the type of aerosol that is being classified.

3. However, it is important to note that unless the aerosol contains ≤ 1 % flammable components (by mass) and that has a heat of combustion < 20 kJ/g, then Category 3 can only be assigned via testing.

4. Therefore, under the option 1 proposed amendments to the Category 3 (b) (provided as Category 3 (2) in ST/SG/AC.10/C.3/2024/111–ST/SG/AC.10/C.4/2024/17) criteria in table 2.3.1, the authors of this document propose that the current reference to the various types of testing for aerosols is retained (*‘.based on the results of the ignition distance test, the enclosed space ignition test, or the aerosol foam flammability test.’*), as detailed in paragraph 8 below.

5. Further and although the proposals presented under option 2 in paragraph 5 of ST/SG/AC.10/C.3/2024/111–ST/SG/AC.10/C.4/2024/17, for categories 3 (b) and 3 (c) (respectively provided as categories 3 (2) and 3 (3) within those documents) correctly includes reference to appropriate testing for aerosols, if the Sub-Committee preferred the option 2 proposals, for greater clarity and consistency between these categories, the authors propose that the following text is added into the category 3 (c) criteria: *‘that contains > 1% (by mass) flammable components and which has a heat of combustion of < 20 kJ/g’*, as detailed in paragraph 9 below.

6. However, it is important to note that under option 2 (as detailed in paragraph 5 above), even with the additional proposed text for category 3 (c), there could still be potential

confusion for the classifier from the inclusion of the “>” and “>” symbols within the criteria for categories 3 (b) and 3 (c).

7. Consequently, the authors of this document consider that option 1, as detailed below under paragraph 8, would provide the clearest and most concise approach to addressing the issues raised in document ST/SG/AC.10/C.3/2024/111–ST/SG/AC.10/C.4/2024/17.

II. Proposal

Option 1

8. Amend the proposal provided in paragraph 4 of ST/SG/AC.10/C.3/2024/111–ST/SG/AC.10/C.4/2024/17 for category 3 criteria in table 2.3.1 (Criteria for aerosols) as follows (*new text is shown in bold*):

3	(a) Any aerosol that contains ≤ 1 % flammable components (by mass) and that has a heat of combustion < 20 kJ/g; or (b) Any other aerosol that, 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.
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Option 2

9. Amend the proposal provided in paragraph 5 of ST/SG/AC.10/C.3/2024/111–ST/SG/AC.10/C.4/2024/17 for category 3 criteria in table 2.3.1 (Criteria for aerosols) as indicated (*new text is shown in bold*):

3	(a) Any aerosol that contains ≤ 1 % flammable components (by mass) and that has a heat of combustion < 20 kJ/g; or (b) 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. (c) Any aerosol that dispenses a foam 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 aerosol foam flammability test, does not meet the criteria of Category 1 or Category 2.
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III. Action requested

10. The TDG and GHS sub-committees are invited to consider the proposals provided in paragraphs 8 and 9 in this document when considering the proposed options to amend the category 3 criteria for aerosols that are provided in document ST/SG/AC.10/C.3/2024/111 – ST/SG/AC.10/C.4/2024/17.