

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

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Item 2 (a) of the provisional agenda

Classification criteria and related hazard communication:

Work of the TDG Sub-Committee on matters of interest to the GHS Sub-Committee

Review of GHS Chapter 2.1: possible structure for the work

Transmitted by the expert from Sweden

1. At the 28th session of the Sub-Committee of Experts on the GHS (SCEGHS) it was decided to undertake a revision of Chapter 2.1 of the GHS, i.e. the Chapter on Explosives. The scope of the work, which is to be done by a correspondence group, is outlined in paragraphs 10-13 of Australia's document ST/SG/AC.10/C.4/2014/15 to the SCEGHS¹ (according to the report from the 28th session of the SCEGHS, see ST/SG/AC.10/C.4/56, paragraphs 66-70).²

2. Paragraph 11 of Australia's document states that no review of the transport requirements or any changes to the Manual of Tests and Criteria are foreseen, but else is quite open as regards extent of the review. In paragraph 12 of the same document, however, questions are asked which give indications to what the problematic areas are where amendments to Chapter 2.1 of the GHS could be needed. The overarching goal of the review is stated in paragraph 10 of the document.

3. The expert from Sweden agrees that there are problems that need to be addressed concerning the GHS hazard communication of some substances, mixtures and articles that have explosive properties. As is also reflected in the paper from Australia, these problems primarily relate to the fact that the classification scheme for (potential) explosives is to some degree dependent on the transport packaging.

4. As an input to the work of the correspondence group, the expert from Sweden would like to share his view on what the main problems are and how they could be tackled. This is to be understood as a supplement to the agreed terms of reference, merely suggesting how at least some of the issues could be formulated into practical work tasks. It takes inspiration from the work done primarily by the expert from Germany already in 2007-2008³, as duly noted in the terms of reference.

5. In the view of the expert from Sweden, there are primarily three focused problems:

(i) **Substances, mixtures and articles that have explosive properties but escape classification as explosives due to their transport packaging.**

There are examples where the transport packaging is such that substances, mixtures and articles that have sufficient intrinsic explosive properties escape

¹ ST/SG/AC.10/C.3/2014/79 (TDG Sub-Committee).

² Sweden is aware of Australia's document INF.8 to this session of the SCEGHS.

³ See e.g. ST/SG/AC.10/C.4/2007/1 and ST/SG/AC.10/C.4/2008/6 (SCEGHS).

classification as explosives. This results in no GHS-labelling for the explosive property, and hence no warning on the package, to the users of such substances, mixtures and articles.

(ii) Substances, mixtures and articles where the GHS-classification is different when removed from of the transport packaging.

The classification of Explosives into Divisions is dependent on the transport packaging. However, a substance, mixture or article could have a different, often more severe, classification when removed from the transport packaging. The GHS currently prescribes that such substances, mixtures and articles should be labelled as Division 1.1 (unless re-tested), which is in most cases overly conservative and therefore somewhat misleading.

(iii) Substances, mixtures and articles that are not packaged for transport.

The entire classification procedure for explosives cannot easily be performed for substances, mixtures and articles that are not packaged for transport. However, there is currently no prescription in the GHS on how to handle such situations.

6. If this way of structuring is followed, the work that needs to be done could be condensed into three corresponding streams of work – each one directed to solve one of the three problems above:

Workstream 1:

- (a) Identify whether there are cases where substances, mixtures or articles with explosive properties lead to no labelling for that property.
- (b) Propose amendments to GHS Chapter 2.1 to address any gaps found, as appropriate.

Workstream 2:

- (a) Identify cases where the current GHS-classification of substances, mixtures or articles with explosive properties leads to inappropriate labelling for that property.
- (b) Propose amendments to GHS Chapter 2.1 to address any gaps found, as appropriate.

Workstream 3:

- (a) Find appropriate criteria for how explosive properties of substances, mixtures and articles that are not packaged for transport can be identified.
- (b) Find appropriate GHS-labelling for such substances, mixtures and articles.
- (c) Propose amendments to GHS Chapter 2.1 to address substances, mixtures and articles with explosive properties that are not packaged for transport, as appropriate.

7. During the course of the work, it may well be the case that further areas are found where amendments need to be made to Chapter 2.1 in accordance with the terms of reference. However, once the solutions to the three problems above have been found, it is the belief of the expert from Sweden that at a large part of the work will be completed, if not all of it.

8. The expert from Sweden welcomes any comments on this view.