

## 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

4 July 2018

Thirty-fifth session

Geneva, 4-6 July 2018

Item 3 (a) of the provisional agenda

### Work of the Sub-Committee of Experts on the Transport of Dangerous Goods on its fifty-second session on matters of interest to the GHS Sub-Committee

#### Note by the secretariat

1. At its fifty-third 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>. These included:

- (a) Explosives and related matters; and
- (b) Use of the Manual of Tests and Criteria in the context of the GHS;

3. Following preliminary consideration in plenary, most issues related to agenda item 2 were referred to the Working Group on Explosives (EWG), which met from 25 to 29 June 2018, with Mr. E. de Jong (Netherlands) as Chair.

4. Document ST/SG/AC.10/C.3/2018/1-ST/SG/AC.10/C.4/2018/1 and informal documents INF.3, INF.4 and INF.5 on the Use of the Manual of Tests and Criteria in the context of GHS under agenda item 10 were also referred to the EWG. The full report of the Working Group has been circulated as informal document INF.67 (fifty-third session of the TDG Sub-Committee)<sup>2</sup>.

5. The following issues have been discussed within the joint session of both sub-committees on the afternoon of Tuesday 3 July 2018:

- (a) Use of the Manual of Tests and Criteria in the context of GHS;
- (b) Reference to an ISO Standard in the GHS;
- (c) Classification of physical hazards according to the GHS, including:
  - Aerosols and classification of chemicals under pressure within Chapter 2.3 of the GHS;
  - Revised OECD Test Guideline 431 allowing sub-categorisation for skin corrosion;
  - Review of Chapter 2.1 of the GHS.

6. The outcome of the discussions on matters of interest to the GHS Sub-Committee is summarized below.

<sup>1</sup> The final version of the report of the TDG Sub-Committee will be circulated as document ST/SG/AC.10/C.3/106 (<http://www.unece.org/trans/main/dgdb/dgsubc3/c3rep.html>)

<sup>2</sup> <http://www.unece.org/trans/main/dgdb/dgsubc3/c3inf53.html>

**Item 1      Testing of oxidizing substances (GHS Sub-Committee agenda item 3 (a))**

*Document:* ST/SG/AC.10/C.4/2018/8 (France)

*Informal document:* UN/SCEGHS/35/INF.19 (France)

The Sub-Committee supported continuation of the work on the refinement of the proposals in document ST/SG/AC.10/C.4/2018/8.

Some experts wished to receive more information about the results of the interlaboratory tests. Others felt that the tests specifications could be further developed to include for instance, details on false positives or a better description of the tests materials (e.g. to avoid those which may have an impact on the test results, such as metal mixing tools). A few others questioned the definition of “total mass loss” in terms of “time”, the reference to a resistance wire with a diameter of less than 1 mm instead of 1.00 mm (most commonly used), or the prevalence of judgement based on previous experience or expert judgement over tests results, where the test results show that the tested mixture does not meet the criteria.

The expert from France explained that the proposals in document ST/SG/AC.10/C.4/2018/8 addressed issues identified during the interlaboratory tests. Having heard the opinions expressed during the discussion, he invited experts to seek the advice of national laboratories and to share their feedback with him. **The TDG Sub-Committee noted that he intended to revise the proposals in the light of the comments made and submit a revised document to the next session.**

Regarding the proposal for further work in informal document INF.19, the Sub-Committee considered that the issues already identified in document ST/SG/AC.10/C.4/2018/8 should be addressed before new items could be considered for further work. **The expert from France agreed with that point of view and said that he would not continue his effort in the direction mentioned in GHS/INF.19 if not supported by the TDG Sub-Committee.**

*(Ref.Doc.: Draft report of the TDG Sub-Committee on its 53rd session: ST/SG/AC.10/C.3/2018/CRP.1/Add.11, paragraphs 135-138)*

**Item 2      Stability tests for industrial nitrocellulose (GHS Sub-Committee agenda item 3 (h))**

*Document:* ST/SG/AC.10/C.3/2018/9 (CEFIC, WONIPA)

Discussion: Recalling the decisions taken at the 51st and 52nd Sessions, the explosive working group reviewed the formal proposals for the addition of tests to evaluate the stability of nitrocelluloses. To make some improvements and ensure completeness, some amendments were made regarding sample drying, wording of proposed special provisions, formatting, and provision of example results.

Conclusion: The explosive working group unanimously supported the proposal from CEFIC as shown in paras. 8 (as amended by the working group), 9 and 10 (as amended by the working group) of 2018/9 and recommends approval by the Sub-Committee of corresponding amendments to the Model Regulations and to the Manual of Tests and Criteria. See Amendment 5 in Annex 2 and Amendments 1, 2, 3, and 4 in Annex 3.

**The TDG Sub-Committee noted the conclusions of the Working Group and adopted the proposed amendments to the Model Regulations and to the Manual of Tests and Criteria with some modifications to amendment 5.**

*(Ref.Doc.: report of the EWG, TDG/53/INF.67, paragraph 7 and ST/SG/AC.10/C.3/2018/CRP.2/Add.2)*

**Item 3 Classification of desensitized explosives for the purposes of supply and use according to GHS Chapter 2.17 (GHS Sub-Committee agenda item 2)**

Informal document: UN/SCEGHS/35/INF.6 (CEFIC)

This issue was first discussed in the EWG. The EWG unanimously supported the proposal from CEFIC as shown in the Annex to 35/INF.6 as amended by the working group and recommended approval by the TDG Sub-Committee of the amendments to the Manual of Tests and Criteria shown in Annex 3 of the report of the Explosive Working Group, TDG/53/INF.67 (Amendments 5 and 6).

**The TDG Sub-Committee adopted the proposed amendments in square brackets with a modification to paragraph 3 of the proposed appendix in amendment 6. The Sub-Committee will confirm these amendments at its next session after further review by the experts.**

*(Ref.Doc: report of the EWG, TDG/53/INF.67, paragraph 8).*

**Item 4 Joint session of the TDG and the GHS sub-committees.**

*Review of Chapter 2.1 of the GHS (GHS Sub-Committee agenda item 3 (b))*

Document: ST/SG/AC.10/C.4/2018/7 (Sweden)

Informal documents: UN/SCEGHS/35/INF.10 (Sweden)  
UN/SCEGHS/35/INF.15 (United States, IME, SAAMI)  
UN/SCEGHS/35/INF.16 (GHS) (Sweden)

This issue was first discussed in a joint meeting of the EWG and the GHS Chapter 2.1 Informal Correspondence Group (ICG) and then in the joint session of the TDG and the GHS sub-committees.

The summary of the discussions may be found in the report of the EWG, TDG/53/INF.67, paragraph 18 and in the draft report of the joint session ST/SG/AC.10/C.3/2018/CRP.1/Add.13, paragraphs 147-149.

**The sub-committees invited the expert from Sweden to continue the work and to submit an official document for the next session, to allow experts enough time to conduct the necessary consultations at national level, evaluate the potential impacts and take an informed decision.**

*(Ref.Doc: report of the EWG, TDG/53/INF.67, paragraph 18 and draft report of the joint session ST/SG/AC.10/C.3/2018/CRP.1/Add.13, paragraphs 147-149).*

*Use of the Manual of Tests and Criteria in the context of GHS (GHS Sub-Committee agenda item 2)*

Document: ST/SG/AC.10/C.4/2018/1 (Chairman of the EWG)

Informal documents: GHS/INF.3, INF.4 and INF.5 (Sweden)

This issue was first discussed in the Explosive Working Group and then in the joint session of the TDG and the GHS sub-committees.

The summary of the discussions is reflected in the report of the EWG, TDG/53/INF.67, paragraph 17 and in the draft report of the joint session ST/SG/AC.10/C.3/2018/CRP.1/Add.13, paragraph 146.

**The sub-committees noted that work on the revision of sections 1 and 10 of the Manual of Tests and Criteria had been completed and that work on the revision of the remaining sections was expected to be completed before the end of the biennium.**

*(Ref.Doc: report of the EWG, TDG/53/INF.67, paragraph 17 and draft report of the joint session ST/SG/AC.10/C.3/2018/CRP.1/Add.13, paragraph 146).*

*Reference to ISO standard 10156 (GHS Sub-Committee agenda item 2)*

Document: ST/SG/AC.10/C.4/2018/2 (EIGA)

**The TDG Sub-Committee adopted the updating of the references to the ISO standard in the Model Regulations. The proposals of amendments to the GHS reproduced below were noted pending endorsement by the GHS Sub-Committee at its thirty-fifth session.**

Draft amendments to the seventh revised edition of the Globally Harmonized System of Classification and Labelling of Chemicals (ST/SG/AC.10/30/Rev.7):

### **Chapter 1.2**

In the Note under the definition of “Oxidizing gas”, replace “ISO 10156:2010” by “ISO 10156:2017”.

### **Chapter 2.2**

2.2.4.2.1 Replace “ISO 10156:2010” by “ISO 10156:2017”.

2.2.4.2.4 Replace “ISO 10156:2010” by “ISO 10156:2017”.

2.2.5 Replace “ISO 10156:2010” by “ISO 10156:2017”.

### **Chapter 2.4**

2.4.1, Note Replace “ISO 10156:2010” by “ISO 10156:2017”.

2.4.4.1 Replace “ISO 10156:2010” by “ISO 10156:2017”.

2.4.4.2 Replace “ISO 10156:2010” by “ISO 10156:2017”.

*(Ref.Doc: draft report of the joint session ST/SG/AC.10/C.3/2018/CRP.1/Add.13, paragraph 150).*

*Classification of aerosols and chemicals under pressure (GHS Sub-Committee agenda item 2)*

Documents: ST/SG/AC.10/C.4/2018/3 (CEFIC, EIGA)  
ST/SG/AC.10/C.4/2018/7 (FEA)

Informal document: GHS/INF.17 (Germany)

In the joint session, there was support for introducing provisions addressing chemicals under pressure in the GHS, as amended by informal document GHS/INF.17. The summary of the discussion may be found in the draft report of the joint session ST/SG/AC.10/C.3/2018/CRP.1/Add.13, paragraphs 152-155.

**The representative of EIGA said that both CEFIC and EIGA would be leading an intersessional informal working group to revise the proposal in the light of the comments made and submit a new document for consideration by both sub-committees at the next session. Experts from the TDG and the GHS sub-committees interested in this work were invited to contact the representatives of EIGA (Mr. Pierre Wolfs) or CEFIC (Ms. Eva Kessler).**

*(Ref.Doc: draft report of the joint session ST/SG/AC.10/C.3/2018/CRP.1/Add.13, paragraphs 152-155).*

*Revised OECD Test Guideline 431 allowing sub-categorisation for skin corrosion (GHS Sub-Committee agenda item 2)*

Document: ST/SG/AC.10/C.3/2018/30 (European Union)

Informal documents: TDG/INF.34 (CEFIC)  
GHS/INF.28 (DGAC)

There was support for the amendments proposed in document ST/SG/AC.10/C.3/2018/30, as amended by GHS/INF.28, with some additional changes. However, several experts felt that as more time was needed to consider the amendments circulated in informal document GHS/INF.28 as well as those proposed orally during the session. **The representative of the European Union said that she would revise the proposal in the light of the comments made and submit an official document for the next session.**

*(Ref.Doc: draft report of the joint session ST/SG/AC.10/C.3/2018/CRP.1/Add.13, paragraph 151).*

*Classification of physical hazards (GHS Sub-Committee agenda item 2)*

Informal document: GHS/INF.13 (Germany)

In the joint session, there was support for the development of guidance as regards combinations/cross-classifications for physical hazards. Others asked for more clarity on the scope of and need for such work if undertaken. The summary of the discussion may be found in the draft report of the joint session ST/SG/AC.10/C.3/2018/CRP.1/Add.13, paragraphs 157-159.

**Although no decision was taken, the sub-committees noted the proposal by Germany to lead an intersessional informal working group to further study this question during the next biennium, in accordance with the tasks listed in paragraph 4 of the informal document. It was noted that the TDG Sub-Committee should be involved in this work as the GHS focal point for physical hazards.**

*(Ref.Doc: draft report of the joint session ST/SG/AC.10/C.3/2018/CRP.1/Add.13, paragraphs 157-159).*

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