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Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals
(Second session, 12-14 December 2001, agenda item 3)

GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Comments on IOMC paper 2001/21 Physical Hazards

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

Further to the first Inf paper offering general comments, EIGA wishes to address the chapter on physical hazards.

Chapter 2.2: Flammable Gases

Criteria

Except for ammonia, EIGA is unaware of flammable gases that have a flammable range of at least 12 percentage points and are not ignitable when in a mixture of 13% or less by volume in air. EIGA suggests deleting (b). This would have the advantage to automatically allocate ammonia to category 2 as it is being classified right now.
Methyl bromide is a difficult case. It has not been classified as flammable by any regulation EIGA is aware of. The literature mentions ranges between 8.6-20.0 vol.% and 13.5-14.5 vol.% according to the source. In the latter case, methyl bromide would join ammonia, in the first case it would become extremely flammable. EIGA suggests contacting the manufacturers to decide on the validity of the range. It is to be noted that this product is to be phased out because of its ozone depletion potential.

Decision logic and guidance

(a) should read "when in a mixture of less than ". Also, should (b) be retained it should read "air of at least 12 percentage points".

The reference to ISO 10156 is recognised by several regulations and should be confirmed. EIGA would like to see this reference in the "agreed text".

Chapter 2.4 : Oxidising gases

ISO 10156 is recognised by several regulations and should be confirmed. EIGA would like to see this reference in the "agreed text".

Chapter 2.5 : Gases under pressure

Definition

The definition given only applies to the UN Division 2.2 for non flammable, non toxic gases. Flammable and toxic gases have no such lower limit. EIGA suggests to refer to the definition in Annex 1 which is the UN definition:
A gas is a substance which:
(a) at 50°C has a vapour pressure greater than 300kPa; or
(b) is completely gaseous at 20°C at a standard pressure of 101.3kPa
When packaged under pressure, they comprise compressed.....

Symbols

Clarification is needed as to the intended scope of this chapter. The wording is not very clear. Is it intended to only apply to gases that are not otherwise classified under the GHS, or is it intended to apply to gases already classified under the GHS, e.g. flammable gases, toxic gases, oxidising gases
The package, a cylinder, conveys a warning in itself. Gases, besides being under pressure can be flammable, oxidising, corrosive, toxic, carcinogenic, mutagenic, reprotoxic and combinations of these. The package itself carries hazard pictograms alerting to a danger. In transport, cylinders need to be labelled with the cylinder label simply to indicate that they do not have flammable or toxic properties. Otherwise, it would not make much sense to label a cylinder with a "cylinder" pictogram. EIGA proposes to adopt this philosophy where the pressure symbol is not required for flammable or toxic gases.

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