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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PROGRAMME OF WORK FOR THE BIENNIUM 2009-2010

Criteria for substances corrosive to metals

Transmitted by the expert from France

Introduction

1. In the framework of its recent contribution to the development of technical guides for helping companies in the future implementation of the EU GHS Regulation, we identified two issues for the assessment of corrosion to metals (chapter 2.16).

First issue

2. The current text of the GHS does not explicitly mention the fact that the criteria for classification of substances and mixtures as "corrosive to metals" refers to both uniform corrosion and localized (pitting) corrosion, although the test mentioned in the Manual of Test and Criteria refers to both types of corrosion.

3. The expert from France became aware of this issue too lately as to produce a working document in due time to solve this issue by proposing an appropriate amendment to the GHS. He proposes to deal with that issue during the next biennium.

Proposal 1:

4. If the Sub-Committee agrees to do so, the expert from France proposes to modify section 2.16.2, table 2.16.1, by referring to the different types of corrosion in the table.

Second issue

5. The second issue relating to the same property is more complex. It came out from discussions between technical experts in corrosion testing that qualifying corrosive properties of

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solids (that are also –at least in the form of powders or granules- potentially covered by GHS) requires further development in terms of methodology assessment.

6. The current protocol (Test C1 from the Manual of Tests and Criteria) was obviously designed for testing liquids and future work is needed to determine how this testing protocol may be adapted for testing solids (in divided form) (e.g. according to solubility...).

Proposal 2:

7. The expert from France proposes that this issue be included in the programme of work for the next biennium (2009-2010) to avoid inconsistencies in GHS implementation plans between countries.

8. The expert from France will submit to the seventeenth session of the Sub-Committee (July 2009) a document detailing the unsolved issues raised by testing solids according to the property: "corrosive to metals". The Sub-Committee may then decide on the best way to continue the work on this matter.
