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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

Twentieth session
Geneva, 7–9 December 2010
Item 4 (a) of the provisional agenda
Implementation of the GHS – Implementation issues

Proposal to address potential issues associated with the adoption of "Corrosive to metals" for supply/use situations

Transmitted by the International Association for Soaps, Detergents and Maintenance Products (AISE), the Soap and Detergent Association (SDA), the International Paint and Printing Ink Council (IPPIC) and the European Chemical Industry Council (CEFIC)[1]

Background

1. At the nineteenth session of the GHS Sub-Committee in June/July 2010, AISE submitted an informal document UN/SCEGHS/19/INF.31 highlighting the potential issues which may arise if the physical hazard "Corrosive to metals" is adopted for supply/use situations.

2. The potential issues identified by AISE included:

(a) Some substances and mixtures will be classified as "corrosive to metals" for supply while not being classified as corrosive to skin/eyes. This will mean that such substances and mixtures classified as irritant to skin and/or eyes (or not classified) will be labelled with a corrosive pictogram derived from the "corrosive to metals" classification, as there is no direct correlation between corrosion to metals and corrosion to skin and/or eyes;

(b) The same hazard pictogram is used for physical-chemical metal corrosion and human health local irreversible effects. This could be very misleading for the end-user

[1] In accordance with the report of the Sub-Committee of Experts on its nineteenth session (see ST/SG/AC.10/C.4/38, paragraph 57).

in that it makes it difficult to differentiate (and therefore know when to take extra care during use) between substances and mixtures that are truly corrosive to skin/eyes and those only corrosive to metals;

(c) The test method for metal corrosion does not reflect typical consumer or professional use conditions as it was designed to cover transport conditions, in particular air transport.

3. Several experts provided comments on the issues and proposed solution identified in UN/SCEGHS/19/INF.31. Whilst there was no consensus for the proposal based on the transport limited quantities, the Sub-Committee did however recognise that the issue raised by AISE needed further consideration.

4. Some experts considered that the hazard class "corrosive to metals" was not relevant for the consumer and workplace sectors. Others noted that competent authorities have the option to follow the building block approach and could therefore decide which hazard classes/categories would be implemented by each sector. The authors acknowledge that competent authorities may apply the building block approach and not adopt the hazard class "corrosive to metals" for supply/use situations. However, should a competent authority decide to adopt "corrosive to metals" for supply/use situations, the authors believe that the GHS should include some provisions to address the associated issues in order to minimise potential confusion for users and not reduce the level of protection.

5. As suggested by some experts, one possible solution to address this issue would be to use different pictograms to indicate corrosion hazards. The development of a new pictogram to indicate either metal corrosion or skin corrosion may take some time and may also have implications for transport pictograms.

6. Many countries have either already adopted or are in the process of adopting "Corrosive to metals" for supply/use situations thus a solution addressing the potential issues highlighted above is urgently needed in the GHS.

7. The authors would welcome the views of the Sub-Committee on the modified proposal below.

Proposal

8. Amend 1.4.10.5.5 to read as follows (new text is <u>underlined</u>):

"1.4.10.5.5 *Special labelling arrangements*

The competent authority may choose to allow communication of certain hazard information for carcinogens, reproductive toxicity and specific target organ toxicity through repeated exposure on the label and on the SDS, or through the SDS alone (see specific chapters for details of relevant cut-offs for these classes.

Similarly, for metals and alloys, the competent authority may choose to allow communication of the hazard information through the SDS alone when they are supplied in the massive, non-dispersible form.

<u>Where a substance or mixture is classified as corrosive to metals but not corrosive to skin and/or eyes, the competent authority may choose to allow the label elements (hazard pictogram, signal word, hazard statement and precautionary statements) linked to corrosive to metals to be omitted from the label of such substances or mixtures which are in the finished state, intended for the final user. The hazard information for the classification "corrosive to metals" should be included in the SDS.</u>"

9. Add the following Note to Table 2.16.2:

"***Note:*** *Where a substance or mixture is classified as corrosive to metals but not corrosive to skin and/or eyes, some competent authorities may allow the labelling provisions described in 1.4.10.5.5.*"