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 2016**

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Item 3(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

Draft proposal for additional introductory text in Chapter 1.1 of GHS regarding the scope for physical hazards

Transmitted by the Chairman of the Working Group on Explosives on behalf of the Working Group

Introduction

1. At several occasions when discussing GHS related proposals, the working group on explosives had questions and discussions on the the exact scope of GHS in relation to physical hazards. The core of the issue is that for a number of physical hazards the classification is depending not only on intrinsic properties but also on other parameters, such as quantity, configuration, packaging and confinement. All these external parameters may change during the life cycle of the substances involved, which may result in invalid classifications and potentially inappropriate hazard communication.

2. The working group is of the opinion that an explanatory paragraph in the Introduction of the GHS document explaining that the classification and hazard communication as given in the GHS, might not always be applicable would be useful for (potential) users of GHS.

3. As a thought-starter the working group is proposing the following text for discussion in the GHS Sub-Committee.

Draft proposal

4. The following wording is tentatively proposed for insertion as a new paragraph in Section 1.1.2, sub-section 1.1.2.6 (Other scope limitations):

1.1.2.6.3 The danger posed by physical hazards depends to some degree on factors other than intrinsic properties such as the amount, packaging, configuration and confinement. Furthermore, these factors may change during the life-cycle. Therefore it may not be feasible to fully apply the classification criteria and labelling elements for physical hazards in all situations, such as manufacturing and processing operations. In such cases risk assessments may be necessary. These could be aided by GHS criteria and by test results, and GHS hazard communication elements may be applied as appropriate.