

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 December 2018

Thirty-sixth session

Geneva, 5-7 December 2018

Item 3 (a) of the provisional agenda

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

Note by the secretariat

1. At its fifty-fourth 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 7 of its agenda¹. 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 26 to 30 November 2018, with Mr. E. de Jong (Netherlands) as Chair. The full report of the Working Group has been circulated as informal document INF.50 (fifty-fourth session of the TDG Sub-Committee) and is reproduced as informal document INF.34 (thirty-sixth session of the GHS Sub-Committee).

4. Documents ST/SG/AC.10/C.4/2018/15, ST/SG/AC.10/C.4/2018/16 and ST/SG/AC.10/C.4/2018/26 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 were also referred to the EWG. See informal document INF.34.

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

6. Unless specified, informal documents listed are the informal documents submitted at the 36th session of the GHS Sub-Committee.

Item 1 Use of the Manual of Tests and Criteria in the context of GHS (GHS Sub-Committee agenda item 3 (a))

Documents: ST/SG/AC.10/C.4/2018/15 (Chairman of the Working Group on Explosives)
ST/SG/AC.10/C.4/2018/16 (Chairman of the Working Group on Explosives)

¹ The final version of the report of the TDG Sub-Committee will be circulated as document ST/SG/AC.10/C.3/108 (<http://www.unece.org/trans/main/dgdb/dgsubc3/c3rep.html>)

ST/SG/AC.10/C.4/2018/26 (Chairman of the Working Group on Explosives)

Informal documents: INF.3, INF.4 and INF.5 (Chairman of the Working Group on Explosives)

7. **The revision work has been completed.** See informal document INF.34, paragraphs 17-19 of the report of the Working Group on Explosives (Chairman of the Working Group).

Item 2 Improvement of the 8 (c) test for UN 3375 ANE candidates (GHS Sub-Committee agenda item 3 (a))

Document: ST/SG/AC.10/C.3/2018/17 (IME)

Informal documents: INF.12 (Canada, IME)
INF.34, paragraph 5 of the report of the Working Group on Explosives (Chairman of the Working Group)

8. The TDG Sub-Committee adopted amendments 1 to 5 in annex 3 of the report of the Working Group on Explosives (reproduced as informal document INF.34). **The consequential amendments to the GHS in amendment 1 in annex 4 of the report of the Working Group on Explosives (informal document INF.34) will be brought to the attention of the GHS Sub-Committee.**

(Ref.Doc.: Draft report of the TDG Sub-Committee on its 54th session: ST/SG/AC.10/C.3/2018/CRP.3/Add.9, paragraph 101)

9. **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):**

See annex 4 of report of the Working Group on Explosives (Chairman of the Working Group) in informal document INF.34.

Item 3 Amendment to the classification of flammable liquids in Chapter 2.6 of the GHS (GHS Sub-Committee agenda item 3 (a))

Document: ST/SG/AC.10/C.4/2018/22 (IPPIC)

Informal document: INF.29 (IPPIC)

10. There was support for the proposal in document ST/SG/AC.10/C.4/2018/22 in principle. However, it was noted that the modified proposal in informal document INF.29 included consequential amendments to the Manual of Tests and Criteria and that it had been circulated rather late. Since several experts expressed some concerns on the proposed amendments in paragraphs 8 and 9 of informal document INF.29 and indicated that they had not had time to conduct the necessary consultations at national level, the TDG Sub-Committee decided to defer their consideration to the next session.

11. **The representative of IPPIC volunteered to submit an official document for the next session that would also take account of the feedback provided by the GHS Sub-Committee.**

(Ref.Doc.: Draft report of the TDG Sub-Committee on its 54th session: ST/SG/AC.10/C.3/2018/CRP.3/Add.10, paragraphs 121-122)

Item 4 Testing of oxidizing substances (GHS Sub-Committee agenda item 3 (a))

Document: ST/SG/AC.10/C.4/2018/24 (France)

Informal document: INF.23 (France)

12. The expert from Germany pointed out that work was still ongoing on Test O.3 and suggested deferring the adoption of the amendments proposed in paragraph 18 of document ST/SG/AC.10/C.4/2018/24 until this work was completed. Several other experts noted that the amendments proposed by France would solve the existing difficulty to find calcium peroxide within the concentration limits currently specified in the Manual and reiterated their support to the proposal.

13. After an exchange of views, **the TDG Sub-Committee adopted the proposals of amendments to the Manual of Tests and Criteria** in paragraphs 17, 18, 19, 20 and 21 in document ST/SG/AC.10/C.4/2018/24.

14. **The TDG Sub-Committee also adopted the proposal in paragraph 22 for continuation of the work on this issue** (see also item 9 below).

(Ref.Doc.: Draft report of the TDG Sub-Committee on its 54th session: ST/SG/AC.10/C.3/2018/CRP.3/Add.10, paragraphs 112-114)

Item 5 Classification of chemicals under pressure (Chapter 2.3 of the GHS and special provision 362 of the Model Regulations) and additional consequential amendments to the GHS (GHS Sub-Committee agenda item 3 (a))

Documents: ST/SG/AC.10/C.4/2018/25 (CEFIC, EIGA)
ST/SG/AC.10/C.4/2018/23 (FEA)

15. There was support for a harmonized approach for the classification for chemicals under pressure for all sectors. However, several experts considered that further work was necessary before the proposed amendments to the Model Regulations could be adopted.

16. In view of the above, **the representative of CEFIC withdrew the proposal in paragraphs 8 and 9 of the document**, invited delegations who offered to provide comments in writing to share them with her and said that she would consider submitting a revised proposal during the next biennium that would also take account of the feedback received from the GHS Sub-Committee.

17. **TDG Sub-Committee experts were invited to work with their counterparts at the GHS Sub-Committee to ensure multisectoral harmonization of the criteria for chemicals under pressure.**

18. **Noting that the proposals in document ST/SG/AC.10/C.4/2018/23 addressed amendments to the GHS only, the Sub-Committee did not consider them.**

(Ref.Doc.: Draft report of the TDG Sub-Committee on its 54th session: ST/SG/AC.10/C.3/2018/CRP.3/Add.10, paragraphs 116-119)

Item 6 Review of Chapter 2.1 of the GHS (GHS Sub-Committee agenda item 3 (b))

Documents: ST/SG/AC.10/C.4/2018/20 (Chairman of the Working Group on Explosives, Sweden)

Informal documents: INF.10 (United States of America, IME, SAAMI)
INF.18 (United States of America, IME, SAAMI)
INF.34, paragraph 10 of the report of the Working Group on Explosives (Chairman of the Working Group)

19. The TDG Sub-Committee took note of the outcome of the discussions of the Working Group on Explosives on this issue (**see informal document INF.34, paragraph 10 of the report of the Explosives Working Group**) and noted that it had accomplished its mandate to review the technical criteria for assignment of explosives to sub-categories 2A, 2B and 2C in the GHS, without consequential changes to the current classification system in transport. It was noted that this would provide an improved system to address classification of explosives in packaging configurations other than those used for transport purposes. The TDG Sub-Committee was informed that **a proposal for amendment to the GHS was being developed**. It was also noted that no agreement was reached on the splitting of Category 1 and that discussions on this issue would continue.

20. The expert from Spain reiterated its opposition to the revised classification scheme developed within the framework of the work on the review of Chapter 2.1 of the GHS.

21. The TDG Sub-Committee expressed its appreciation to the Working Group for the work accomplished in this area. The Chairman of the Working Group informed the TDG Sub-Committee that **the Working Group would continue to provide technical advice and support to the GHS Sub-Committee and its informal correspondence group on the review of Chapter 2.1, if needed**.

(Ref.Doc.: Draft report of the TDG Sub-Committee on its 54th session: ST/SG/AC.10/C.3/2018/CRP.3/Add.9, paragraphs 108-110)

Item 7 Alignment of the wording of “shall be considered” and “shall be categorised” in the Manual of tests and Criteria in the context of the GHS (GHS Sub-Committee agenda item 3 (a))

Informal document: INF.11 (Germany)

22. After discussion in the Working Group of Explosives of the TDG Sub-Committee, **Germany withdrew informal document INF.11**. See informal document INF.34, paragraph 20 of the report of the Working Group on Explosives.

Item 8 Updating of references to OECD Guidelines (GHS Sub-Committee agenda item 3 (a))

Document: ST/SG/AC.10/C.3/2018/70 (European Union)

23. The TDG Sub-Committee **adopted the amendment to 2.8.3.2 of the Model Regulations** to take into account the revised OECD Test Guideline 431 allowing sub-categorisation for skin corrosion with some changes.

(Ref.Doc.: Draft report of the TDG Sub-Committee on its 54th session: ST/SG/AC.10/C.3/2018/CRP.3/Add.10, paragraph 115)

Item 9 Programme of work

Terms of reference for the work on combinations of physical hazards

Document: ST/SG/AC.10/C.4/2018/21 (Germany)

24. There was general support to the terms of reference proposed by Germany for a systematic analysis of all possible combinations of physical hazard classes with regards to their simultaneous assignment to a chemical. The TDG Sub-Committee noted that the GHS Sub-Committee would consider including this item on its programme of work for 2019-2020.

(Ref.Doc.: Draft report of the TDG Sub-Committee on its 54th session: ST/SG/AC.10/C.3/2018/CRP.3/Add.10, paragraph 120)

Criteria for water-reactivity

25. The expert from Germany informed the TDG Sub-Committee that some work was done on this issue but considered that there was no need to keep it as specific item in the programme of work for the next biennium.

(Ref.Doc.: Draft report of the TDG Sub-Committee on its 54th session: ST/SG/AC.10/C.3/2018/CRP.3/Add.11, paragraph 129)

Tests for oxidizing liquids (UN Test O.2) and oxidizing solids (UN Tests O.1 and O.3)

Document: ST/SG/AC.10/C.4/2018/24, paragraph 22 (France)

Informal document: INF.22 (France)

26. The TDG Sub-Committee noted that work on tests O.1, O.2 and O.3 would have to be pursued during the next biennium and agreed to the additional tasks proposed in paragraph 2 (a) and (b) of informal document INF.22, as well as those listed in paragraph 3 of informal document INF.19 (submitted at the thirty-fifth session of the GHS Sub-Committee) referred to in document ST/SG/AC.10/C.4/2018/24, paragraph 22. It was also noted that France would continue to lead the work on this matter.

(Ref.Doc.: Draft report of the TDG Sub-Committee on its 54th session: ST/SG/AC.10/C.3/2018/CRP.3/Add.11, paragraph 132)

Working Group on Explosives

27. The TDG Sub-Committee agreed on the work items for 2019-2020 proposed by Working Group in paragraph 21 of the report of the Working Group on Explosives of the TDG Sub-Committee reproduced in informal document INF.34. It also agreed that the Working Group should meet again twice during that period under the Chairmanship of Mr. E de Jong (Netherlands).

(Ref.Doc.: Draft report of the TDG Sub-Committee on its 54th session: ST/SG/AC.10/C.3/2018/CRP.3/Add.11, paragraph 133)

Consolidated programme of work for 2019-2020

28. The TDG Sub-Committee agreed to include the following items in its work programme for 2019-2020:

- (a) Explosives and related matters (including review of test series 6; improvement of test series 8; review of tests in parts I, II and III of the Manual of Tests and Criteria; UN standard detonator; review of packing instructions for explosives; application of security provisions to explosives N.O.S.; Test N.1 for readily combustible solids; review of Chapter 2.1 of the GHS; energetic samples; issues related to the definition of explosives; review of packaging and transport requirements for ANEs);
- (b) Listing, classification and packing (including amendments to the list of dangerous goods and packing instructions; toxicity of UN Nos. 2248, 2264 and 2357, polymerizing substances);
- (c) Electric storage systems (including testing of lithium batteries; hazard-based system for classification of lithium batteries; transport provisions; damaged or defective lithium batteries; and sodium-ion batteries);
- (d) Transport of gases (including global recognition of UN and non-UN pressure receptacles);

- (e) Miscellaneous proposals of amendments to the Model Regulations (including documentation (e.g. e-documentation), marking and labelling issues; packaging issues; tank issues; fibre-reinforced plastics (FRP) portable tanks);
 - (f) Cooperation with IAEA;
 - (g) Global harmonization of transport of dangerous goods regulations with the Model Regulations;
 - (h) Guiding principles for the Model Regulations;
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