



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 Transport of Dangerous Goods

Sixty-fourth session

Geneva, 24 June–3 July 2024

Item 10 (b) of the provisional agenda

Issues relating to the Globally Harmonized System of Classification and Labelling of Chemicals:

Simultaneous classification in physical hazards and
possible combination of hazards

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals

Forty-sixth session

Geneva, 3–5 July 2024

Item 2 (b) of the provisional agenda

Work on the Globally Harmonized System of Classification and Labelling of Chemicals:

Simultaneous classification in physical hazards and
precedence of hazards

Proposal for further clarification on the hazard class “Aerosols” in the Globally Harmonized System

Transmitted by the European Aerosol Federation (FEA)*

I. Introduction

1. At its forty-fifth session, the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (GHS Sub-Committee) acknowledged that the improvement of the text of note 2 below table 2.3.1 of the GHS fell outside the current scope of the work of the informal working group on combinations of physical hazards and invited FEA to consider taking the lead on this topic and submit a proposal.
2. FEA agrees it makes sense to clarify the text of chapter 2.3 at once.
3. This document builds on document ST/SG/AC.10/C.3/2024/4–ST/SG/AC.10/C.4/2024/1 and related informal documents INF.4–INF.3 transmitted by the expert from Germany on behalf of the informal working group on combinations of physical hazards.
4. The proposal below has been prepared in cooperation with the Household and Commercial Products Association (HCPA) of the United States of America.

II. Discussion

5. It was informally discussed that “*NOTE 2: Aerosols containing more than 1 % flammable components or with a heat of combustion of at least 20 kJ/g, which are not submitted to the flammability classification procedures in this chapter should be classified*”

* A/78/6 (Sect. 20), table 20.5.



as aerosols, Category 1.” is deemed to be normative and thus should be in the main text rather than in a note. The text could also be more precise.

III. Proposal for the GHS

6. In chapter 2.3, FEA proposes to amend note 2 below table 2.3.1 (Criteria for aerosols) as follows (new text is shown **bold, underlined**, deleted text is marked as ~~strike through~~):

“**2.3.1.2.2** ~~NOTE 2:~~ Aerosols containing more than 1 % flammable components or with a heat of combustion of at least 20 kJ/g **that have not been tested according to 2.3.1.2.1, third indent**, ~~which are not submitted to the flammability classification procedures in this chapter~~ should be classified as aerosols, Category 1.”

IV. Consequential amendment

7. If option 1 for aerosols in document ST/SG/AC.10/C.3/2024/4–ST/SG/AC.10/C.4/2024/1 is preferred and this proposal agreed, consequently the proposed “NOTE 2” will be below the new paragraph 2.3.1.2.2 and should be renamed “NOTE”.

8. If option 2 for aerosols in document ST/SG/AC.10/C.3/2024/4–ST/SG/AC.10/C.4/2024/1 is preferred and this proposal agreed, there is no consequential amendment.

V. Request to the sub-committees

9. The TDG and GHS sub-committees are invited to consider the proposal for aerosols in paragraph 6 of this document in connection with the proposals submitted by the informal working group on combinations of physical hazards.
