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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

Sixteenth session Geneva, 10 -12 (a.m) December 2008 Item 2 (a) of the provisional agenda

UPDATING OF THE SECOND REVISED EDITION OF THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Physical hazards

Clarification for the classification of aerosols for flammability

Transmitted by the expert from Sweden¹

Background

1. The GHS has a separate hazard class "flammable aerosols" for aerosols with flammable properties (see Chapter 2.3 of the GHS).

2. Based on the content of flammable component(s), on the heat of combustion and/or on the outcome of specified tests it is decided whether or not any given aerosol should be classified as a flammable aerosol (see Chapter 2.3 of the GHS).

¹ In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.4/24, Annex 2 and ST/SG/AC.10/34, para. 14).

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3. The flammable component(s) of an aerosol may itself (themselves) be classified in the hazard classes "flammable gas", "flammable liquid" or "flammable solid" according to the criteria in Chapters 2.2, 2.6 or 2.7 of the GHS.

Problem

4. A substance or mixture classified as a flammable gas, flammable liquid or flammable solid contained in an aerosol dispenser may thus result in the aerosol dispenser being classified as a flammable aerosol. This at first glance results in double classification for the same hazardous property, which should be avoided.

5. It has therefore to be made clear in the GHS that aersosol dispensers should not be classified as flammable gases, flammable liquids or flammable solids. They should be subjected to the procedure for flammable aerosols only, and classified and labelled accordingly.

Proposals

6. In Chapter 2.2 (flammable gases) amend NOTE 2 under Table 2.2.1 to read as follows:

"NOTE 2: Aerosols should not be classified as flammable gases. See Chapter 2.3."

7. In Chapter 2.6 (flammable liquids) insert a NOTE 4 under Table 2.6.1 to read as follows:

"NOTE 4: Aerosols should not be classified as flammable liquids. See Chapter 2.3."

8. In Chapter 2.7 (flammable solids) insert a NOTE 2 under Table 2.7.1 to read as follows:

"NOTE 2: Aerosols should not be classified as flammable solids. See Chapter 2.3."

Consequentially change the word "NOTE" to read "NOTE 1" under Table 2.7.1.