
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

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HAZARD COMMUNICATION ISSUES

Precautionary Statements for Gas Cylinders Proposal to remove Precautionary Statement P410 for gases under pressure

Transmitted by the Responsible Packaging Management Association of Southern Africa
(RPMASA) on behalf of the Southern African Compressed Gas Association

Introduction

1. At the 16th session (December 2008) the Subcommittee approved the programme of work for the biennium 2009-2010 to include revision of Annexes 1, 2 and 3 of the GHS for precautionary statements.
2. INF.14 tabled at the 17th session by the United Kingdom on behalf of the informal correspondence group made several proposals for amendments to the precautionary statements including on a proposal regarding P410 "Protect from sunlight" for gases under pressure.
3. For some considerable time the Southern Africa Compressed Gases (SACGA) Association's Working Group, relating to gas cylinders, has been discussing precautionary statement labels and, in particular the GHS P410 which states that cylinders should be protected from sunlight. P410 presents the gas industry in the region with a major problem as it, and its customers, cannot protect each and every compressed gas cylinder from sunlight. It is totally impractical in the African context and the SAGCA has no records of incidents due to storage in sunlight.
4. The SACGA believe that this precautionary statement should therefore be removed from the GHS with regard to compressed gases. The reason being that, in practice, it is difficult to achieve with very few companies actually complying with this requirement. Cylinder standards throughout the world state that the test pressure of a cylinder must be equal to, or greater than, the developed pressure at 65°C and hence the cylinders are well protected from an integrity point of view.

5. The SACGA has been in discussion with the European Industrial Gases Association (EIGA) regarding this subject who would like to have this statement made not mandatory in regions where it is deemed not to be necessary.

Proposal

6. The SACGA therefore wishes to formally request the Sub-Committee to consider removal of the precautionary statement P410 for gases under pressure.

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