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

6 December 2010

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Comments on ST/SG/AC.10/C.4/2010/13: Hazard communication for supply and use of aerosols (FEA/UK)

Transmitted by the expert from Australia

Background

1. At the nineteenth session of the GHS Sub-Committee, the expert from the United Kingdom and FEA jointly submitted a formal document ST/SG/AC.10/C.3/2010/17 (also submitted to the thirty-seventh session of the TDG Sub-Committee as ST/SG/AC.10/C.3/2010/17) which took into account the comments received. There was general support for the proposal to include all aerosols (flammable and non-flammable aerosols) under a single chapter of the GHS but several experts considered that further work was needed regarding the proposed hazard communication elements. The Sub-Committee invited the authors of the document to take account of the comments received and to submit a revised proposal. The expert from the United Kingdom and FEA hope that this formal proposal, which takes into careful account the comments received will be finalised and adopted at this last meeting of the biennium.

Proposal

- 2. Australia considers that if aerosols classification is to be located within a single chapter ("one stop shop" of the GHS it is important to ensure the principle of labelling relevant to the classification as dictated by other classification criteria is clear within that chapter. Australia therefore proposes slight clarifying amendments to the text within the FEA/UK proposal in INF.13 to clarify that additional pictograms (beyond the flame) may be required depending on classification.
- 3. Amend the proposed 2.3.2.1 to add a clarifying clause at the end:
 - "2.3.2.1 Amend NOTE 2 to read:

"NOTE 2: Flammable Aerosols do not fall additionally within the scope of chapters 2.2 (flammable gases), 2.5 (gases under pressure), 2.6 (flammable liquids) and 2.7 (flammable solids). Depending on their contents, aerosols may however fall within the scope of other hazard classes, *including their labelling elements*."

