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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

Thirteenth session  
Geneva, 9-11 July 2007  
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

Flammable aerosols

Transmitted by the European Aerosol Federation (FEA)

**Introduction**

1. The technical focal point for completing the GHS work on flammable aerosols is the UN Sub-Committee of Experts on the Transport of Dangerous Goods.
2. Section 31 of the *UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria* now includes the classification procedures, test methods and criteria for flammable aerosols.
3. The GHS text has then implemented these provisions in its Chapter 2.3 related to flammable aerosols. Paragraph 2.3.4.2.2 directly refers to sub-sections 31.4, 31.5, and 31.6 of the *UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria*, for the flammability test methods.

4. A note existing in Section 31 of the *UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria* was omitted in the GHS text. FEA discovered this discrepancy following discussion with the European Commission about the implementation of the GHS within the European Union.

5. Sub-section 31.2 of the *UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria* related to the scope includes the following text:

***“NOTE: Aerosol dispensers not submitted to flammability classification procedures in this sub-section shall be classified as extremely flammable”.***

6. FEA supports the conservative approach which considers all aerosols containing flammable components to be classified and labelled with the strictest flammable classification unless the aerosol manufacturer demonstrates there is no risk. This approach is mirrored in the above note which was omitted in the GHS text. This note also allows aerosol manufacturers not to test under the new regime aerosol products classified and labelled as extremely flammable. Testing these products would be superfluous and without impact on the safety of users.

7. FEA proposes to align the GHS text with the *UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria*.

8. FEA does not foresee problems with safety, feasibility or enforceability.

## **Proposal**

### **2.3.2.1 Replace “NOTE” by “NOTE 1”**

At the end of the text add ***“NOTE 2: Aerosol dispensers not submitted to flammability classification procedures in this chapter shall be classified as extremely flammable.”***

or

**2.3.2.2** At the end of the text add ***“NOTE: Aerosol dispensers not submitted to flammability classification procedures in this chapter shall be classified as extremely flammable.”***

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