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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Geneva, 5-16 July 1999,
agenda item 5 (g))

MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS

Toxic by inhalation substances

CEFIC comments on ST/SG/AC.10/C3/1999/49

Background

There is no evidence that the classification criteria for the toxic materials of Class 6.1 PG I presently included in the Model Regulation are inadequate or detrimental in term of safety performances.

The proposal to create in Class 6.1 PG I different subgroups for the toxic by inhalation substances has never been justified on the basis of practical safety problems arising from the present system. The adoption of such new classification criteria will only therefore lead to unnecessary change and to additional needless complexity.

The principle has until now never been adopted or endorsed by the UNCETDG.

The introduction of the packing instructions P601 and P602 was finally agreed at the December 1998 meeting because it was based on existing packing requirements.

Comments on this new proposal

Proposal ST/SG/AC.10/C3/1999/49 is based on the rational of this unapproved classification system. It is not justified by practical safety consideration but only by the need to align the packing instructions with this new classification system.

CEFIC has a specific major reservation on the new concept of double packaging, consisting of an inner drum and an outer one.

Conclusions

The above-mentioned proposal ST/SG/AC.10/C3/1999/49, is based on the axiom that Class 6.1 PG I has to be separated in two subgroups, and is in this respect questionable.

The issue of toxic by inhalation should only be addressed on the base of well-defined safety problems arising from the present Model Regulation requirements.
