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**COMMITTEE OF EXPERTS ON THE TRANSPORT  
OF DANGEROUS GOODS**

**Sub-Committee of Experts on the  
Transport of Dangerous Goods**  
(Eighteenth session, 3-14 July 2000,  
agenda item 5 (a))

**MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS  
ON THE TRANSPORT OF DANGEROUS GOODS**

**Listing and classification**

**Fumigated Units**

**Transmitted by the expert from the United States of America**

**Background**

1. The Sub-Committee will recall that at its 16th session, a proposal by the International Maritime Organization was adopted (see UN/SCETDG/16/INF.16) to add a new entry to the dangerous goods list for transport units under fumigation. Special provision 29 was also applied to the new entry. Following discussions at the 17th session (see ST/SG/AC.10/C.3/32, paras. 40-41 and Addendum 2), it was decided to amend the English version of the proper shipping name of UN 3359 ("fumigated unit") and to add a new special provision 302 to define the word "unit".
2. In the 11th revised edition of the Model Regulation, only the general documentation and identification requirements in 5.5.2 are applicable to fumigated units. These provisions were included to preclude exposure to toxic fumigants upon entering a fumigated unit. The warning sign posted on the door to the transport unit along with required documentation was considered adequate recognizing that fumigated transport units posed no other risk than confined space entry.

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3. The effect of the new entry for fumigated units is to subject such units to all of the applicable requirements of the regulations, including documentation, placarding, emergency response information, and training requirements. The expert from the United States notes that fumigated units in sea transport, by nature of their being stowed in confined spaces below deck, pose a greater hazard than in land transport. While the application of additional requirements as contained in the reformatted IMDG Code may be warranted for sea transport these should not apply generally to all modes of transport.

4. For other than sea transportation, the provisions in 5.5.2 are sufficient to ensure the safe transport of fumigated units. On this basis it is proposed that clarifying text be added to the regulations to ensure that for land transport, fumigated units are not subject to any requirements of the regulations other than those in 5.5.2 for fumigated units.

5. The Sub-Committee should also reconsider the application of special provision 29 to FUMIGATED UNITS. This special provision 29 applies to low hazard self heating substances (e.g., agricultural products) and provides relief from package labelling requirements. Since "units" described in the new special provision 302 are not subject to labelling requirements this provision is irrelevant and should be removed from the new entry.

6. The IMDG Code also incorporates a provision for removal of the warning sign upon ventilation of the unit (see DSC 5/13/Add.1, Annex 2, p. 120). It is proposed that this provision be incorporated in 5.5.2.

**Proposal**

7. Add the following text to special provision 302:

Except when transported by sea, fumigated units are only subject to the requirements in 5.5.2.

8. Remove "29" from column (6).

9. Add the following sentence to the end of paragraph 5.5.2.2:

"When the fumigated transport unit has been ventilated to remove harmful concentrations of fumigant gas, the warning sign shall be removed."

**Revised requirements for fumigated units based on the above proposal:**

10. The new entry would appear in the dangerous goods list as follows:

1	2	3	4	5	6	7	8	9	10	11
3359	FUMIGATED UNIT	9			302	NONE	NONE			

11. Special Provision 302 would read as follows:

302 In the proper shipping name, the word UNIT means:

a road freight vehicle;  
a railway freight wagon;  
a freight container;  
a road tank vehicle;  
a railway tank wagon; or  
a portable tank.

Except when transported by sea, fumigated units are only subject to the requirements in 5.5.2.

12. 5.5.2 would read as follows:

**"5.5.2 Documentation and identification of fumigated transport units**

5.5.2.1 Transport documents associated with the carriage of transport units that have been fumigated shall show the date of fumigation and the type and amount of the fumigant used. In addition, instructions for disposal of any residual fumigant including fumigation devices (if used) shall be provided.

5.5.2.2 A warning sign as specified in Figure 5.6 shall be placed on each fumigated transport unit in a location where it will be easily seen by persons attempting to enter the interior of the unit. When the fumigated transport unit has been ventilated to remove harmful concentrations of fumigant gas, the warning sign shall be removed."

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