

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 Transport of Dangerous Goods
(Twentieth session, 3-12 December 2001, agenda item 10)

MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Comments on ST/SG/AC.10/C.3/2001/41 (Switzerland)

Transmitted by the Expert from the United Kingdom

1. The expert from the United Kingdom notes and sympathises with the principle of the proposal from the observer of Switzerland detailed in paper ST/SG/AC.10/C.3/2001/41. In reviewing the proposal, however, the expert from the United Kingdom notes certain omissions from the description of the modal provisions given by the observer from Switzerland. The expert from the United Kingdom also believes that there is a wider problem that needs to be addressed and which might also solve difficulties associated with the air transport of Consumer Commodities, currently assigned a unique identifying number of ID 8000.
2. The expert from the United Kingdom does not believe that the products described by the observer from Switzerland can be exempt from all the provisions of the Model Regulations for multi-modal transport. This is demonstrated by the provision made for Consumer Commodities in the ICAO Technical Instructions, to which no UN substance identification number is assigned. It is also recognised that there is currently modal disharmony in addressing such products. It should be possible to develop regulatory text which can be applied in all modes but which would still enable individual modes to exempt such products from some or all of their requirements. This would necessitate the identification of such retail products by the assignment of a new UN number, proper shipping name, and associated provisions.
3. In the view of the expert from the United Kingdom it is not appropriate to apply the proposed UN number to goods of all Classes and Hazard Divisions of dangerous goods. It is proposed that this be limited to aerosol products in Class 2, and substances of 3, 4.1, 4.3, 5.1, 6.1, 8 and 9. It is also suggested that they be limited to products of Packing Group II and III.
4. It is suggested that a new Packing Instruction be introduced and allocated the same number as that currently used by the ICAO Technical Instructions, in order to facilitate the introduction of such a packing instruction.
5. The expert from the United Kingdom therefore suggests that the proposal from the observer of Switzerland be developed further in the following manner:

Proposals

1. Introduce a new Proper Shipping Name of "RETAIL PRODUCTS, READY FOR USE containing small quantities of dangerous goods".

UN. No (1)	Name and description (2)	Class or division (3)	Subsidiary risk (4)	UN packing group (5)	Special Provisions (6)	Limited quantities (7)	Packagings and IBCs	
							Packing instruction (8)	Special provisions (9)
xxxx	RETAIL PRODUCTS, READY FOR USE containing small quantities of dangerous goods	9			3XX	NONE	P910	

2. Add a new Special Provision SP 3xx as follows:

Retail Products, Ready For Use are materials intended for personal [for humans or animals] or household use, including items administered or sold to patients by doctors or medical administrations. They are limited to aerosol products of Division 2.1 and 2.2 and to substances of Packing Group II or III in Classes and Hazard Divisions 3, 4.1, 4.3, 5.1, 6.1, 8 and 9.

3. Add new Packing Instruction P 910 as follows:

P 910	PACKING INSTRUCTION	P910
This instruction applies to UN xxxx		
<p>Packagings shall conform to the general provisions in 4.1.1.1, 4.1.1.2, 4.1.1.4 and 4.1.1.8 and be so designed that they meet the construction requirements of 6.1.4.</p> <p>Inner packagings or aerosol products shall not exceed 500ml or 500g.</p> <p>Outer packagings constructed of suitable material of adequate strength and design in relation to the packaging capacity and its intended use shall be used. Where this packing instruction is used for the transport of articles or inner packagings of combination packagings the packaging shall be designed and constructed to prevent inadvertent discharge of articles during normal conditions of transport.</p> <p>Packages shall be capable of withstanding a 1.2 m drop onto solid concrete in the position most likely to cause damage.</p> <p>The gross mass of the package shall not exceed 25kg.</p>		

