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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
Transport of Dangerous Goods**
(Twenty-first session, 1-10 July 2002
agenda item 10)

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

Consumer commodities

Transmitted by the expert from the United Kingdom

INTRODUCTION

1. At the 20th session of the UN Sub-Committee of Experts on the Transport of Dangerous Goods, the expert from the United Kingdom presented Information Paper 18 which was in response to ST/SG/AC.10/C.3/2001/41 from the observer from Switzerland. The Swiss observer had proposed that pharmaceutical products ready for use be exempt from the provisions of the Model Regulations.
2. The expert from the United Kingdom sympathised with the intentions of the Swiss paper but felt that pharmaceutical products should not be exempt from all the Model Regulations which at present governed them and that the proposals should be broadened out to cover other consumer products. In addition the United Kingdom's proposals would be so worded as to remove the need for ICAO's Consumer Commodities Identification Number ID 8000. The United Kingdom would add both a new proper shipping name, and a new packing instruction P 910 based on the current packing instruction in the ICAO Technical Instructions.
3. This packing instruction has existed in the ICAO Technical Instructions since it was first published in 1982. There is no record of any incident occurring as a result of the use of this instruction in the last 20 years. In addition goods move to and from airports classified in this way without difficulty and there is no evidence of a difficulty in safety terms.

4. During the discussions, most present sympathised with the intentions of the United Kingdom expert but felt that more work was needed on the proposals, including the proper shipping name. The expert from the United Kingdom resubmits his proposals below which take account of comments made during the discussions and subsequently in writing and asks that the Sub-Committee now consider adopting them.

PROPOSALS

1. Introduce a new proper shipping name of "CONSUMER COMMODITY 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)
4000 ?	<u>CONSUMER COMMODITY READY</u> containing small quantities of dangerous goods	9			3XX	NONE	P910	

Comment: The UN substance identification number 4000 is proposed in order that this is an easy identifier in the same way that ICAO use UN 8000 for consumer commodities now.

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

"Items transported under this proper shipping name are those intended for personal, recreational or household use, including items administered or sold to patients by doctors or medical administrations and those sold or administered by veterinary practitioners for animals. They are limited to those items containing dangerous goods in quantities not exceeding the limited quantity thresholds shown in Column 7 of the dangerous goods list."

Comment: This special provision clarifies the meaning of consumer commodities and the meaning of "small quantities".

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, 4.1.1.6 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 30kg.</p>		

"

4. Amend 3.4.9 to read as follows:

"Limited quantities of dangerous goods for personal or household use, that are packaged and distributed in a form intended or suitable for sale through retail agencies, or intended for distribution by medical professionals or for personal medical use, may furthermore be exempted from the requirements for a dangerous goods transport document provided that they meet all the requirements of P910."
