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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

Limited quantities comments on INF 51

Transmitted by the experts from France, Germany, [Netherlands](#) and Sweden

Introduction

We welcome the principle of having consumer commodities indicated as dangerous goods. These risks have been shown to not be insignificant from the French study (Ref 2002/47). However the present system of two different regimes (Limited quantities and consumer commodities) is too complicated and confusing for the consignors, emergency responders and enforcement bodies.

Furthermore, the two regimes overlap and there is no safety benefit from having the two systems. Indeed there are adverse safety effects from the confusion.

The following proposal is for a simple consolidated system adaptable for all modes.

Proposal:

Add the [following entry](#):

UN No.	Name and Description	Class	Sub-risk	PG	Special Provisions	Limited quantities
4000	DANGEROUS GOODS PACKAGED IN LIMITED QUANTITIES					See Chapter 3.4

Proposed Revision to Chapter 3.4

CHAPTER 3.4

~~LIMITED QUANTITIES AND CONSUMER COMMODITIES~~

DANGEROUS GOODS PACKAGED IN LIMITED QUANTITIES

3.4.1 *Limited Quantities*

3.4.2 Limited quantities are dangerous goods offered for transport and transported in accordance with the applicable provisions in this Chapter. All provisions and requirements of these Regulations apply to the transport of limited quantities except as specifically provided in this Chapter.

3.4.3 The quantity limits for the inner packaging or article is specified for each substance in Column 7 of the Dangerous Goods List in Chapter 3.2. In addition, the word "None" in Column 7 indicates that the substance shall not be transported as a limited quantity.

3.4.4 Dangerous goods shall be packed in inner packagings placed in suitable outer packagings. However, the use of inner packagings is not necessary for the transport of articles such as aerosols or "receptacles, small, containing gas". The packagings shall meet the provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8 and be designed so that they meet the construction requirements of 6.1.4. The total gross mass of the package shall not exceed 30 kg.

3.4.5 Shrink-wrapped or stretch-wrapped trays in compliance with 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8 are acceptable as outer packagings, except that inner packagings that are liable to break or be easily punctured such as those made of glass, porcelain, stoneware or certain plastic materials, etc., shall not be transported in such outer packagings. The total gross mass of the package shall not exceed 20 kg.

3.4.6 Liquids included in Class 8, Packing Group II, and contained in glass, porcelain or stoneware inner packagings shall be enclosed in a compatible and rigid intermediate packaging.

3.4.7 Different dangerous goods transported as limited quantities may be placed in the same outer packaging provided they will not interact dangerously in the event of leakage.

3.4.8 Segregation provisions for dangerous goods need not apply within a vehicle or freight container.

3.4.9 ~~In addition to the provisions for documentation specified in 5.4.1, the words "limited quantity" or "LTD QTY" shall be included on a transport document with the description of the consignment (see 5.4.1.5.2).~~

The dangerous goods description and additional information (see 5.4.1) shall be limited to the following:

?? UN 4000

?? DANGEROUS GOODS PACKAGED IN LIMITED QUANTITIES.

?? The class (es) and Subsidiary risks (in brackets) of the goods in the package preceded by the word class

?? The total quantity of dangerous goods covered by the description (by volume or mass, as appropriate).

The classes shall be mentioned immediately after the PSN.

3.4.10 Packages containing limited quantities need not bear a label or the proper shipping name of the substance, but shall be marked with the UN number ~~of the substance~~ 4000, preceded by the letters "UN", placed within a diamond. The width of the line forming the diamond shall be at least 2 mm and the UN number shall be at least 6 mm high. ~~When more than one substance is included in the package and the substances are assigned to different UN numbers, the diamond shall be large enough to include each relevant UN number.~~ The class and subsidiary risk numbers (in brackets) of the goods in the packaging shall be displayed on the package, adjacent to the diamond -label. [The mark shall be applied on at least one side or end of the outer packaging and conform to the provisions of paragraphs 5.2.1.2 (a) to (d).]

~~3.4.11 *Consumer Commodities*~~

~~3.4.11.1 Consumer commodities are dangerous goods intended or suitable for personal, recreational or household use including drugs, medicines and other items administered or sold to or for humans or animals by doctors, medical administrations, veterinary practitioners, pharmacies or retail sales distributors.~~

~~3.4.11.2 Dangerous goods transported as consumer commodities shall be in compliance with 3.4.4 to 3.4.8.~~

~~3.4.11.3 The quantity limit for the inner packaging or article is specified for each substance [in Column 7 of the Dangerous Goods List in Chapter 3.2. The word "NONE" in Column 7 indicates that the substances shall not be transported as a consumer commodity **OR** 500 g/500ml except when the word "NONE" appears in Column 7 of the Dangerous Goods List]~~

~~Note: The quantity limits should be included once the limits have been by the Sub-Committee and a decision is taken.~~

~~3.4.11.4 A transport document is not required for dangerous goods transported under this entry.~~

~~3.4.11.5 Packages containing consumer commodities shall bear the UN number "4000", preceded by the letters "UN", placed within a diamond. The width of the line forming the diamond shall be at least 2 mm and the UN number shall be at least 6 mm high. The mark shall be applied on at least one side or end of the outer packaging and conform to the provisions of paragraphs 5.2.1.2 (a) to (d).~~

Consequential amendments :

Delete 5.4.1.5.2 and renumber the following paragraphs accordingly.

Annex 1

Examples:

UN 4000 DANGEROUS GOODS PACKAGED IN LIMITED QUANTITIES

Class 3, (6.1)/class 2

