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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-sixth session
Geneva, 29 November-7 December 2004
Item 2 of the provisional agenda

PROVISIONS ADOPTED BY THE SUB-COMMITTEE FOR AMENDMENTS TO THE RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Comments on ST/SG/AC.10/C.3/2004/100 (Secretariat) and on ST/SG/AC.10/C.3/2004/105 (USA)

Transmitted by the expert from Belgium

Introduction

1. The Expert of Belgium agrees with the comment made by the secretariat in point 15 of its paper ST/SG/AC.10/C.3/2004/100 (“... *the packing instructions are not the appropriate places for indicating what is allowed for carriage or not, and that exemptions should rather be indicated by special provisions in Chapter 3.3 ...*”).
2. The Expert of Belgium is also of the opinion that LP02 and L2 should not be listed in columns (8) and (9) of the dangerous goods list against UN 1950, as indicated in paragraph (b) of this point 15. But PP87 is a similar case (only authorised for waste aerosols), and should therefore also be eliminated from column (9) of the dangerous goods list against UN 1950.
3. When LP02, L2 and PP87 are eliminated from the dangerous goods list, they can only be reached via special provision XXX. This means that the first part of the proposed PP87 and L2 (describing their field of application) are unnecessary duplications of what already has been indicated in special provision XXX itself. Moreover, with the proposed texts of XXX and L2, the aerosols must always meet the provisions of special provision 190 and of 6.2.4.2 if they are packed according to LP02 and L2.
4. The text of special provision XXX, as proposed in paragraph (a), could be editorially improved and simplified.
5. It will indeed be very difficult or impossible to identify toxic aerosols when these have been collected after use, as indicated in paragraph 16. A different approach might be necessary for the aerosols having been used, and the ones rejected after the hot water bath test.

Belgium reached a similar conclusion after studying ST/SG/AC.10/C.3/2004/105 of the United States of America and the safety concerns it contains : the adopted texts might be limited to aerosols collected after use (which in many cases will no longer fulfill special provision 190) for which there is a real necessity and no other practical solution possible. For the ones rejected after the hot water bath test other solutions might be envisaged in the next biennium.

If this approach is acceptable, the text between square brackets in proposal 1 is to be eliminated.

Proposals

1. Change the content of special provision XXX as follows :
“XXX When waste aerosols[, other than toxic aerosols,] are transported for the purpose of recycling or disposal, they need not necessarily meet the requirements of special provision 190 [and/or of 6.2.4.2], provided they are packed in accordance with packing instruction P003 and special provision PP87, or packing instruction LP02 and special packing provision L2.”
 2. PP87, LP02 and L2 are not to be listed in columns (8) and (9) of the Dangerous Goods List against UN 1950.
 3. Amend the first sentence of PP87 to read:
“The packagings shall have ...” (remainder unchanged and last sentence in square brackets deleted).
 4. Amend the first sentence of L2 to read:
“Inner packagings are not required. The large packaging ...” (remainder unchanged and last sentence in square brackets deleted).
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