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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

Thirtieth session
Geneva, 4-12 (a.m.) December 2006
Item 2(a) of the provisional agenda

**PROPOSALS OF AMENDMENTS TO THE RECOMMENDATIONS
ON THE TRANSPORT OF DANGEROUS GOODS**

Excepted quantities

Note by the secretariat

Assignment of excepted quantity codes for substances of Division 5.2

1. At its last session, the Sub-Committee adopted codes for excepted quantities on the basis of ST/SG/AC.10/C.3/2006/45 (United Kingdom). It was agreed to add alphanumeric codes to column 7 of the Dangerous Goods List (see ST/SG/AC.10/C.3/2006/101).
2. For Division 5.2 the code E2 has been indicated with a footnote reading: "Division 5.2 dangerous goods may ONLY be transported as excepted quantities if in UN No. 3316, Chemical Kit or First Aid Kit;".
3. However, the table where this footnote appears is not to be reproduced in the Model Regulations. Therefore the secretariat suggests that the indication "NONE" should be entered in column 7 for all Division 5.2 entries, and that the following special provision be assigned to all these entries:

"SPXXX Organic peroxides may be transported as excepted quantities when transported under UN No. 3316, Chemical kit or First aid kit."

Assignment of Excepted quantity codes for substances of Class 2

4. For Division 2.2, the code E2 has been indicated with a footnote reading: "For gases, the volume indicated for inner packagings refers to the water capacity of the inner receptacle and the volume indicated for outer packagings refers to the combined water capacity of all inner packagings within a single outer package;".
5. The information given in this footnote may be useful for the users of Excepted quantities regime. Therefore, the secretariat suggests that this should be reproduced as a new paragraph in 3.5.1.2, after the table.

Assignment of excepted quantity codes for substances without packing groups

6. Some dangerous goods for which packing groups are not assigned have not been addressed. It seems that they should be assigned the mention "NONE":

UN No.		Class / Division	LQ
1327	HAY, STRAW or BHUSA	4.1	3 kg
3360	FIBRES, VEGETABLE, DRY	4.1	NONE
1856	RAGS, OILY	4.2	NONE
2426	AMMONIUM NITRATE, LIQUID (hot concentrated solution)	5.1	NONE
2794	BATTERIES, WET, FILLED WITH ACID, electric storage	8	1 L
2795	BATTERIES, WET, FILLED WITH ALKALI, electric storage	8	1 L
2800	BATTERIES, WET, NON-SPILLABLE, electric storage	8	1 L
3028	BATTERIES, DRY, CONTAINING POTASSIUM HYDROXIDE SOLID, electric storage	8	2 kg
2990	LIFE-SAVING APPLIANCES, SELF-INFLATING	9	NONE
3072	LIFE-SAVING APPLIANCES NOT SELF-INFLATING containing dangerous goods as equipment	9	NONE
3166	ENGINE, INTERNAL COMBUSTION or VEHICLE, FLAMMABLE GAS POWERED or VEHICLE, FLAMMABLE LIQUID POWERED	9	NONE
3171	BATTERY-POWERED VEHICLE or BATTERY-POWERED EQUIPMENT	9	NONE
3245	GENETICALLY MODIFIED MICROORGANISMS or GENETICALLY MODIFIED ORGANISMS	9	NONE
3316	CHEMICAL KIT or FIRST AID KIT	9	NONE
3334	AVIATION REGULATED LIQUID, N.O.S.	9	NONE
3335	AVIATION REGULATED SOLID, N.O.S.	9	NONE
3359	FUMIGATED UNIT	9	NONE
3363	DANGEROUS GOODS IN MACHINERY or DANGEROUS GOODS IN APPARATUS	9	NONE

7. Should the Sub-Committee decide to assign "NONE" to UN 3316, the secretariat proposes to add the following sentence at the end of special provision 251 in Chapter 3.3: "Chemical kits and first aid kits containing dangerous goods in inner packagings which do not exceed the quantity limits for excepted quantities applicable to individual

substances as specified by means of an alphanumeric codes in column 7 (bottom of the cell) of the Dangerous Goods List may be transported in accordance with Chapter 3.5."

Column 7: Heading and explanatory text

8. For the assignment of Excepted quantity codes in column 7 of the Dangerous Goods List, the principle adopted by the Sub-Committee according to the proposal in ST/SG/AC.10/C.3/2006/45 is to split the cells in column 7 into 2 parts separated by an horizontal line.
9. The Dangerous Goods List is actually presented as an Excel document. Excel format allows a wide range of keyword searching possibilities. However, this format does not permit to split existing cells easily while keeping the possibility to use the data filter function properly.
10. Therefore, the Secretariat proposes, as an alternative, to place the Limited Quantity values in the top of the cells and the Excepted quantity codes in the bottom of the cells in column 7, without horizontal line between these two codes.
11. Proposal:

In the amendments adopted by the Sub-Committee at its 27th, 28th and 29th sessions (Document ST/SG/AC.10/C.3/2001/101), modify the amendments to Chapter 3.2 as follows:

3.2.1 In the new explanatory text for column 7:

In the first sentence, replace "above the horizontal line" by "at the top of the cells".

In the second sentence, replace "Below the horizontal line" by "At the bottom of the cells".

In the last sentence, replace "above or below the horizontal line" by "at the top or at the bottom of a cell".

In the amendments to the Dangerous Goods List, delete the horizontal line in the new heading for column 7 and delete ", add a horizontal line in each cell and insert" after "In column (7)".

Assignment of a code for goods not permitted to be transported as excepted quantities

12. It is furthermore proposed to use a code "E0" instead of "None" for the goods not permitted to be transported as excepted quantities.

References to column 7 of the Dangerous Goods List

13. Different paragraphs of the UN Model Regulations refer to limited quantities indicated in column 7 of the Dangerous Goods List. The assignment of Excepted quantity codes in column 7 will make it necessary to amend the existing references to column 7.

14. Proposals:

Amend the following paragraphs as follows:

3.3.1 SP236 Replace the last sentence ("The quantity limit shown in Column 7 of the Dangerous Goods List applies to the base material.") by the following: "The quantity limit and the excepted quantity code shown in column 7 of the Dangerous Goods List apply to the base material."

SP251 In the first paragraph, replace "in column 7" by "in column 7 (top of the cell)".
In the last paragraph, insert "for limited quantities" after "quantity limits".

SP301 In the fourth and the last sentences, replace "in column 7" by "in column 7 (top of the cell)".

3.4.1 In the second and the third sentences, replace "in column 7" by "in column 7 (top of the cell)".

5.4.1.5.2 Replace "in column 7" by "in column 7 (top of the cell)".

3.5.1.2, heading of the columns in the table

15. The secretariat suggests that the heading of the second and third columns should be amended to read "Maximum quantity per inner packaging" and "Maximum quantity per outer packaging" respectively.

Marking of packages (3.5.1.5)

16. The secretariat would like to remind the Sub-Committee that one of its basic terms of reference, embodied in ECOSOC resolution 468G (XV) of 15 April 1953, is "Recommending marks or labels for each grouping or classification which shall identify the risk graphically and without regard to printed text". In international transport, a text printed on a package in a given language is not necessarily understood everywhere in the world. Therefore the secretariat suggests that the words "DANGEROUS GOODS IN EXCEPTED QUANTITIES" be replaced by the acronym "EQ".

17. The words "Class & Division Number(s)" should not appear on the mark itself and should be replaced by an asterisk with a corresponding footnote "* / location of class and division numbers" or "* / Place for class and division numbers".

18. The meaning of "Class & Division Number(s)" should be clarified. For example, for gases of Division 2.2, it is not clear whether the indication should be "2, 2.2", "2" or "2.2". In this respect, it should be recalled that the word "division" is not used in the IMDG Code except for the Classes 1 and 2 divisions, and that it is used in ADR, RID and ADN only for Class 1 divisions.

19. For the identification of the name of the consignor or consignee, this should be done on the model of the mark through asterisks (see para. 17 above).

20. The secretariat would like to recall that the words "consignor" and "consignee" may be interpreted differently depending on the legal context of the contract of transport, and this could be a problem for multimodal international operations. For example, under ADR, when there is a contract of carriage, the consignors and consignees are the consignors and consignees according to the contract of carriage and are not necessarily the original consignor and the final consignee, since they could be freight forwarders. Usually, the name of the original consignor and final consignee are marked on the package, but since the consignor and the consignee could be different on a specific leg of a multimodal transport operation, the requirement to indicate the name of the consignor or consignee on this mark could lead to problems.

3.5.1.6

21. The term "transport unit" is not defined in the Model Regulations, except in 5.3.1.1.1 where it is defined "for the purposes" of Chapter 5.3. It is not clear how this provision would be interpreted for air transport.
22. The secretariat suggests that the "transport units" concerned be specifically named in this paragraph if they differ from those listed in 5.3.1.1.1, or, if they are the same, that a definition be included in 1.2.1. It is recalled that the word "cargo transport unit" is used in the IMDG Code, and that a transport unit under ADR means a motor vehicle without an attached trailer or a combination of a motor vehicle with an attached trailer.

3.5.1.7

23. This paragraph is likely to raise problems of interpretation. It should make clear whether a transport document according to Chapter 5.4 is requested or not, and if such a document is not requested, whether the information is required when electronic data processing (EDP) or electronic data interchange (EDI) transmission techniques are used instead of paper documentation.

Cross-references to paragraphs related to Class 7

24. As a consequence to the draft amendments concerning radioactive material adopted by the Sub-Committee at its last session (see ST/SG/AC.10/C.3/58/Add.2), the secretariat proposes to replace "2.7.7.1.2.1 and 2.7.9.1" by "1.5.1.5" in the note in 3.5.1.1.
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