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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-ninth session
Geneva, 3-12 (a.m.) July 2006
Item 5 of the provisional agenda

LIMITED QUANTITIES

Comments on limited quantities

Transmitted by the International Civil Aviation Organization (ICAO)

1. Background

1.1 Extracts from the report of the DGP/20 with regard to limited and excepted quantities are presented below for the information of the meeting.

2. Limited quantities

2.1 During DGP-WG/05, members had indicated general support for revising the limited quantity provisions in the Technical Instructions in order to avoid confusion in modal regulations. It was noted that the use of the term “limited quantities” was misleading as provisions for air transport were markedly different to those for other modes. In order to reduce confusion, it had been suggested consideration be given to adopting a new name and it was agreed the issue needed further discussion. The Technical Instructions uses the terminology “limited quantities” but the requirements in the Technical Instructions are significantly different from the limited quantity provisions in the UN Model Regulations and in the regulations of the other modes.

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2.2 A comparison of the Technical Instructions provisions with the UN Regulations had shown that:

- (a) all the products now allowed under the ICAO provisions for limited quantities are allowed under the UN provisions for limited quantities;
- (b) the quantities allowed for limited quantities in the Technical Instructions fall within the limits authorized under the UN limited quantities provisions;
- (c) both ICAO and the UN allow a maximum gross mass of the package of 30 kg;
- (d) in the UN as well as in ICAO, packages must comply with the specified construction requirements and single packagings cannot be used. UN Specification Packagings are not required; and
- (e) the provisions for documentation exist in the Technical Instructions as well as in the UN Recommendations.

2.3 The major differences between the Technical Instructions and the UN Recommendations are:

- (a) full marking and labeling compliance is required by the Technical Instructions; and
- (b) the Technical Instructions require packages to be capable of withstanding a 1.2 m drop test and a 24-hour stacking test.

2.4 Since the differences noted above indicate that the Technical Instructions are more stringent than the UN Recommendations, it was suggested that packages prepared according to the Technical Instructions should be acceptable to other modes, provided the packages were made easily recognizable by marking them with the UN number placed inside a diamond outline. It was agreed to add a requirement to the Technical Instructions (in 5.2.4.1.1) for such a mark, to become mandatory from 1 January 2009. It was also suggested that the UNSCETDG should be requested to add a Note to its recommendations that for air transport, hazard warning labels must be applied.

3. **Excepted quantities**

3.1 The meeting was advised that a working paper on the subject of excepted quantities of dangerous goods had been presented by a member of the UNSCETDG to that body's meeting in July 2005. No conclusion had been reached, and a new paper had now been prepared for presentation at the December 2005 meeting of UNSCETD. This paper was presented to DGP/20 for its review so that the DGP's views could be presented to UNSCETD by the Secretary. It was noted that the new text was much closer to the Technical Instructions than was the case in the previous submission.

3.2 Members had reviewed the proposals but had been hampered because they could not easily identify precisely what differences there were between the new proposals and the Technical Instructions. It was agreed that a detailed comparison would be produced but in any case it would be valuable for DGP to advise the UNSCETDG, through the Secretary, that it strongly supported the development of intermodal provisions on this subject and that it had been a very successful concept in aviation. One member reiterated that, notwithstanding the good safety record, his organization had misgivings about excepted and limited quantity provisions. He considered that, whatever the UNSCETDG might decide, the provisions of the Technical

Instructions should not be made less stringent. This point was echoed by other speakers. Furthermore, the UNSCETDG should be advised that it would be highly desirable to have Model Regulations broadly based on the Technical Instructions. Although some differences could be accepted, weakening the stringency of the Technical Instructions provisions would not be acceptable.

4. **Proposal**

4.1 The Sub-Committee is invited to note the support of ICAO for this work, the development of intermodal provisions for excepted quantities in particular.

4.2 The Sub-Committee is further invited to consider this suggestion in paragraph 2.4 “that packages prepared according to the Technical Instructions should be acceptable to other modes, provided the packages were made easily recognizable by marking them with the UN number placed inside a diamond outline.”
