

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
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Item 2(a) of the provisional agenda

Comments on paper ST/SG/AC.10/C.3/2006/76

Transmitted by The Council on Safe Transportation of Hazardous Articles (COSTHA)

In paper ST/SG/AC.10/C.3/2006/76 the International Air Transport Association (IATA) proposes to add additional definitions in 1.2.1; revise marking requirements for overpacks set out in 5.1.2.1; add additional requirements in 5.4.1.5.9 and create a new 7.1.1.10. The primary basis for these proposals is to identify the existence of freight forwarders and how packages are handled and loaded into transport units or conveyance.

COSTHA recognizes the concerns raised in their paper however we believe there are significant problems with the proposals. We appreciate the opportunity to express our comments.

Comments on the proposals

Proposal 1

1. The proposed definition of a unit load could conceivably include a freight container or a transport unit. We do not believe these were intended to be included as a unit load. We recommend the definition of a unit load should be revised to read:

Unit load means an enclosure used to contain one or more packages to form one unit for convenience of handling and stowage during transport. A unit load does not include an overpack, freight container or transport unit.

Examples of unit loads are a number of packages:

- (a) placed or stacked on to a load board such as a pallet and secured by strapping, shrink wrapping, stretch wrapping, or other suitable means;
- (b) placed in a protective outer packaging such as a box or crate;
- (c) permanently secured together in a sling;
- (d) placed in an aircraft container or aircraft pallet.

Proposal 2

The proposal specifies that the marking requirements for overpacks, set out in 5.1.2.1 be mandatory. The provisions set forth in the Modal regulations are recommendations only and it is expected that governments, intergovernmental organizations and international organization will use the Modal Regulations as a basis for national and international transport regulations.

The proposed text is essentially the same as the text currently specified in 5.1.2.1 and we do not feel that any substantial reason (s) were presented to make any changes to the current text.

Proposal 3

The insertion of the words “**Overpack Used**” on a shipping document does not provide any additional safety or hazard communication information that is not otherwise identified in the Modal Regulations. The documentation requirements set forth in Chapter 5.4 clearly identifies the dangerous goods that are contained in the consignment. Adding the words “**Overpack Used**” serves no useful purpose.

Proposal 4

We believe the requirements specified in Proposal 4 would be best served if it were reflected in 5.1.2. We recommend the Title of 5.1.2 be revised to read **Use of overpack and unit load**. A new 5.1.2.4 would be added to include the text presented in proposal 4.

We also recommend the word “or” and item (C) be deleted. Item (C) is already addressed in item (B).

It should be pointed out that other National or International regulations, as well as consignors may have additional restriction of dangerous goods that may be placed in a unit load. We suggest the **NOTE** at the end of proposal 4 be revised to read:

“**NOTE:** Modal regulations; National and International modal regulations, consignor and/or carrier requirements may apply restrictions on the type and/or quantity of dangerous goods that may be place in a unit load.”
