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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

Thirty-third session
Geneva, 30 June-9 July (a.m.) 2008
Item 5 of the provisional agenda

LIMITED QUANTITIES (MULTIMODAL HARMONIZATION)

Transport of dangerous goods in limited quantities

Transmitted by the expert from France*

Background

1. At its 31st session, the Sub-Committee considered the issue of a harmonized marking for the transport of limited quantities of consumer goods. It was recognized that national and international regulatory systems had varying approaches, in particular with respect to the interpretation of 3.4.9 which states “limited quantities of dangerous goods for personal or household use, that are packaged and distributed in a form intended or suitable for sale through retail agencies, may furthermore be exempted from marking of the UN number on the packaging and from the requirements for a dangerous goods transport document.” During several informal working group meetings, the issue was discussed extensively and it was agreed that a harmonized marking for international transport of such goods would be desirable. Such a marking could be incorporated within national and international regulations to facilitate the transport of such goods on a worldwide level.

* In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.3/60 para. 100 and ST/SG/AC.10/C.3/34, para. 14)

2. The informal working group produced a report outlining a recommended way forward which was circulated to both the International Maritime Organization (IMO) and the International Civil Aviation Organization (ICAO) for review and comment. At its 32nd session, the informal working group met again and reviewed the feedback received. The Sub-Committee's report noted that the feedback was generally favorable (see ST/SG/AC.10/C.3/64, section V). A few issues were discussed in detail, for example, the representatives of ICAO and IMO identified marking and documentation provisions that are considered necessary by their respective regulatory bodies. It was agreed however that a harmonized marking recognized by all modes would facilitate international transport and help to eliminate problems with reshipments at destination (i.e. shipments made in accordance with the US CFR 49 or the European ADR).

3. The intent of this paper is to propose a revised marking which could serve as a basis for harmonization of existing national and international regulatory systems. It is suggested that with the adoption of a harmonized marking, the provisions of Chapter 3.4 could be significantly revised. In line with the recommendations made by the working group and in view of the feedback received from the modal authorities, this working document proposes to:

- (a) Establish a single marking that would be applied to all limited quantities;
- (b) Allow flexibility for the various modes in determining documentation requirements;
- (c) Eliminate the reference to "household goods" in Chapter 3.4.

However the possibility to add additional information as stated in the proposed new 3.4.7 would give the flexibility to keep special provisions adapted to the air mode where for instance "ID8000" could be added as it was suggested during the meetings of the working group for limited quantities falling under the ICAO "consumer commodities".

This needs not to appear in the model rules but room is given to ICAO to make its own decision.

This extra additional marking would then be accepted by all other modes.

4. A first draft of this proposal has been circulated as agreed during the 32nd session of the sub-committee. Some comments have pointed out the need to clarify the «additional information» in 3.4.7. To take care of this it is proposed to add some clarification text at the end of 3.4.7, showing that this addition is limited to some precise cases. The example of ICAO ID 8000 consumer commodities is given. To be clearly identified the text added to the initial proposal.

Proposals

5. The proposals are contained in the three annexes to this document:

Annex 1 contains the minimal changes needed with "track changes";

Annex 2 contains the modified paragraphs in Chapter 3.4 as they would appear;

Annex 3 contains a second option as it appears that the layout of the paragraphs could be rationalized by merging the provisions concerning segregation in and outside the package, and the provision concerning labelling and marking.

Annex 1**Chapter 3.4****DANGEROUS GOODS
PACKED IN LIMITED QUANTITIES****Proposal with track changes**

3.4.1 to 3.4.6 (*unchanged*)

~~3.4.7 In addition to the provisions for documentation in 5.4.1, the words “limited quantity” or “LTD QTY” shall be included within the description of the consignment (see 5.4.1.5.2).~~

~~3.4.78 Packages containing dangerous goods in limited quantities need not be marked with the proper shipping name of the contents, but shall be durably and legibly marked with the the marking shown in Figure 1 below. The marking must be readily visible. Additional information relative to the nature of the goods may appear in the center portion of the marking.[when it is needed to identify certain groups of goods, for mode specific reasons (e.g. « ID 8000 consumer commodity » in the ICAO technical instructions)]. UN number of the contents (preceded by the letters “UN”) placed within a diamond. The width of the line forming the diamond shall be at least 2 mm; the number shall be at least 6 mm high. Where more than one substance is included in the package and the substances are assigned to different UN numbers, then the diamond shall be large enough to include each relevant UN number.~~

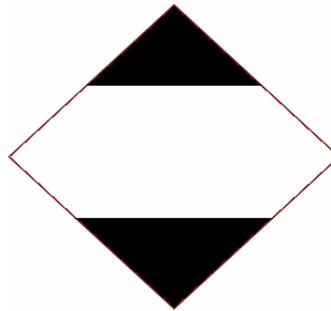


Figure 1 – Marking for packages containing limited quantities. Top and bottom portions must be black, center area white or suitable contrasting background. Minimum dimensions: 100 mm x 100 mm. Minimum width of line forming diamond: 2 mm.

~~3.4.89 Limited quantities of dangerous goods for personal or household use, that are packaged and distributed in a form intended or suitable for sale through retail agencies, may furthermore be exempted from marking of the UN number on the packaging and from the requirements for a dangerous goods transport document. Other than for air or sea transport, the documentation provisions of 5.4.1 need not apply to limited quantities of dangerous goods. When a transport document is required, in addition to the provisions for documentation in 5.4.1, the words “limited quantity” or “LTD QTY” shall be included within the description of the consignment (see 5.4.1.5.2).~~

Annex 2

Chapter 3.4

**DANGEROUS GOODS
PACKED IN LIMITED QUANTITIES**

Proposed new text

3.4.1 to 3.4.4 (*unchanged*)

3.4.5 Different dangerous goods packed in limited quantities may be placed in the same outer packaging provided they will not interact dangerously in the event of leakage. (*unchanged*)

3.4.6 Packages of dangerous goods transported according to this Chapter need not be labeled. Any segregation provisions for dangerous goods need not apply within a vehicle or freight container. (*unchanged*)

3.4.7 Packages containing dangerous goods in limited quantities need not be marked with the proper shipping name of the contents, but shall be durably and legibly marked with the the marking shown in Figure 1 below. The marking must be readily visible. Additional information relative to the nature of the goods may appear in the center portion of the marking, [when it is needed to identify certain groups of goods, for mode specific reasons (e.g. «ID 8000 consumer commodity» in the ICAO technical instructions)].

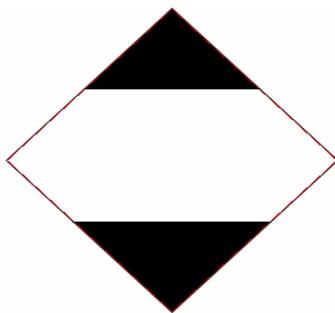


Figure 1 – Marking for packages containing limited quantities. Top and bottom portions must be black, center area white or suitable contrasting background. Minimum dimensions: 100 mm x 100 mm. Minimum width of line forming diamond: 2 mm.

3.4.8 Other than for air or sea transport, the documentation provisions of 5.4.1 need not apply to limited quantities of dangerous goods. When a transport document is required, in addition to the provisions for documentation in 5.4.1, the words “limited quantity” or “LTD QTY” shall be included within the description of the consignment (see 5.4.1.5.2).

Annex 3**Chapter 3.4****DANGEROUS GOODS
PACKED IN LIMITED QUANTITIES****Option 2 : same contents as in annexes 1 and 2 with a different
paragraph layout**

3.4.1 to 3.4.4. (*unchanged*)

3.4.5 Different dangerous goods packed in limited quantities may be placed in the same outer packaging provided they will not interact dangerously in the event of leakage. Any segregation provisions for dangerous goods need not apply within a vehicle or freight container.

3.4.6 Packages containing dangerous goods in limited quantities need not be labeled, and marked with the proper shipping name of the contents, but shall be durably and legibly marked with the marking shown in Figure 1 below. The marking must be readily visible. Additional information relative to the nature of the goods may appear in the center portion of the marking, [when it is needed to identify certain groups of goods, for mode specific reasons (e.g. « ID 8000 consumer commodity » in the ICAO technical instructions)].

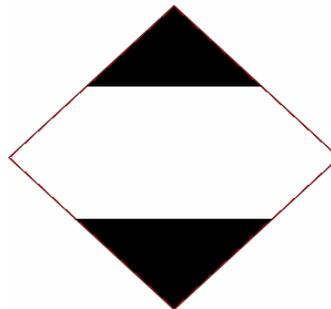


Figure 1 – Marking for packages containing limited quantities. Top and bottom portions must be black, center area white or suitable contrasting background. Minimum dimensions: 100 mm x 100 mm. Minimum width of line forming diamond: 2 mm.

3.4.7 Other than for air or sea transport, the documentation provisions of 5.4.1 need not apply to limited quantities of dangerous goods. When a transport document is required, in addition to the provisions for documentation in 5.4.1, the words “limited quantity” or “LTD QTY” shall be included within the description of the consignment (see 5.4.1.5.2).
