

**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

2 December 2010

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Item 4 of the provisional agenda

**Listing, classification and packing**

## Proposal for a new UN number for Mercury in manufactured articles

### Transmitted by the expert from Canada

1. In INF.15 the expert from the United Kingdom suggested one way of addressing the difficulties arising from the allocation of the toxicity subsidiary risk would be to create a completely separate UN number for the Model Regulations MERCURY IN MANUFACTURED ARTICLES which would not attract the 6.1 subsidiary risk.
2. Based on the comments provided by the Subcommittee on the proposals contained in INF.15 and confirmation that UN 2809 Mercury will be assigned a subsidiary of Division 6.1 in the 17<sup>th</sup> revised edition of the Model Regulations, a modified proposal has been developed that takes into account the existing exemptions for surface transport while recognizing the unique air transport considerations.
3. The assignment of a new special provision against the existing entry for UN 2809 was considered, however the need to have specific packing requirements for these articles that do not conform with P800 made this solution impractical.
4. Add a new entry in the Dangerous Goods List as follows:

UN No.	Name and description	Class or division	Subsidiary risk	UN packing group	Special provisions	Limited and excepted quantities		Packagings and IBCs	
						(7a)	(7b)	Packing instruction	Special provisions
(1)	(2)	(3)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9)
XXXX	MERCURY CONTAINED IN MANUFACTURED ARTICLES	8	<u>6.1</u>	<u>III</u>	SP3ZZ SP3YY	[5 kg]	<u>E0</u>	P003	PPYY

5. Add new special provisions SP3ZZ and SP3YY in column (6) and in Chapter 3.3. Add PPYY in column (9) and in P003.

"SP3ZZ For land and sea transport mercury in manufactured instruments and articles containing not more than 1Kg of mercury are not subject to these Regulations. For manufactured instruments and articles containing quantities of mercury greater than 1 kg but not more than 5 kg see UN 3363. For air transport articles containing not more than 15g of mercury are not subject to these Regulations".

(Note: this aligns to RID/ADR SP599 and IMDG SP941 and also aligns with the current requirements for UN 3363)

"SP3YY A toxic subsidiary risk label need not be applied"

"PPYY For UNXXXX sealed inner liners or bags of strong leak-proof and puncture resistant material impervious to mercury which will prevent escape of the substance from the package irrespective of the position of the package shall be used. For air transport additional requirements may apply".

(Note: this text would broadly align with ICAO requirements)

6. Add a new special provision SP 3XX in column (b) against UN 2809 as follows:

"3XX For manufactured instruments and articles containing mercury see UN XXXX."

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