

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

17 June 2011

Thirty-ninth session

Geneva, 20–24 June 2011

Item 8 of the provisional agenda

Global harmonization of transport of dangerous goods regulations with the Model Regulations

Harmonization of the IMDG Code with the 17th revised edition of the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations

Note by the secretariat

1. The Editorial and Technical Group (E and T Group) of the IMO Sub-Committee on Dangerous Goods, Solid Cargoes and Containers met from 6 to 15 April 2011 under the chairmanship of Mrs. Olga Lefèvre Pestel (France).
2. When considering harmonization of the IMDG Code with the 17th revised edition of the UN Recommendations on the Transport of Dangerous Goods, the E and T Group noted a number of issues that should be referred to the UN Sub-Committee.

Assignment of SP 172 to UN Nos 2977 and 2978

3. The E and T Group noted that UN 2977 and UN 2978 had been assigned SP 172 in ADR/RID but not in the Recommendations on the transport of dangerous goods, requested TDG Sub-Committee to look into this discrepancy and expressed the view that DSC 16 should consider the assignment of SP 172 to the above UN numbers on the basis of relevant decisions of the TDG Sub-Committee;

Assignment of PP40

4. The E and T Group noted that the assignment of PP40 to substances in P410 in the IMDG Code was not in line with the assignment of the same in the Recommendations on the transport of dangerous goods and was of the opinion that, as a general rule, special packing provisions applicable to sea transport should be drafted by the TDG Sub-Committee, in consultation with the Sub-Committee and, therefore, invited interested delegations to submit appropriate proposals for consideration at the TDG Sub-Committee in the first instance.

Container/vehicle packing certificate

5. The E and T Group invited the TDG Sub-Committee to note that reference to “dangerous goods documentation” in 5.4.2.3 and 5.4.2.4 was incorrect and instead it should make reference to “container/vehicle packing certificate”.

Lithium batteries – new provisions in 2.9.4

6. In reviewing amendments related to lithium batteries, the group, noting that 2.9.4.1 required cells or batteries to be of the type proved to meet the requirements of each test of the Manual of Tests Criteria, Part III, sub-section 38.3, existing batteries of design types conforming to previous versions of the Manual of Tests Criteria were not in accordance with the new provisions and that the TDG Sub-Committee will reconsider this issue on the basis of the relevant decisions of the ICAO Technical Panel, which considered these issues at its last meeting, requested DSC 16 to consider the matter further, taking into account relevant decisions of the thirty-ninth session of the TDG Sub-Committee.

Revision of chapter 3.4 – dangerous goods packed in limited quantities

7. Regarding amendments to provisions on marking and placarding (annex 3, paragraph 3.4.5.1), the group had mixed views on whether to align the existing provisions in the IMDG Code, amendment 35-10, associated with the surviving of the information for at least three months' immersion in the sea or to align with a corresponding generic text in the Recommendations on the transport of dangerous goods and requested the Sub-Committee to consider the matter and decide accordingly.

Transport of UN 2211 and 3314 in cargo transport units

8. The group, recalled that DSC 15 having considered the document DSC 15/3/3 (Germany), proposing to assign a new special provision for the transport of substances UN 2211 and UN 3314, taking into account the fact that the release of flammable vapours would lead to a rise in pressure which could damage the container, and, having noted that the safety concerns are not only related to pressure but also to flammability had agreed with the proposal in principle, prepared new maritime mode specific SP 965, taking into account the proposal in document E&T 15/3/3 (CEFIC) (see annex).

9. Having debated the proposals in document E&T 15/3/3 and noting that the proposals in paragraphs 3.1 and 3.3 of the above document have already been taken into account in the above new SP 965, the group invited interested delegations to submit proposals associated with transporting UN 2211 and UN 3314 in hermetically sealed and suitable pressure resistance packagings (E&T 15/3/3, paragraph 3.2) to DSC 16 for consideration.

UN 2381 and SP 354

10. Regarding the assignment of SP 354 to UN 2381 PG II, the group was of the view that the assignment of SP 354 was restricted to substances in PG I and, therefore, this special provision should not be assigned to UN 2381 substances falling in PG II and decided, in this particular case, not to harmonize with the Recommendation on the transport of dangerous goods and invited the TDG Sub-Committee to note the above decision of the group and decide accordingly.

UN 3497 and SP 300

11. When looking into the assignment of SP 300 to UN 3497, the group, noting that the assignment of the above special provision was irrespective of the packing group the substance belonged to, and as such should be assigned to UN 3497 substances falling in all packing groups, invited the TDG Sub-Committee to reconsider the assignment of SP 300 to UN 3497 in the Recommendations on the transport of dangerous goods, where its application was limited to PG II only.

Annex

SP965

“965 When transported in cargo transport units, the cargo transport units shall provide an adequate exchange of air in the unit (e.g., by using ventilated container, open-top container or container in one door off operation) to prevent the build-up of an explosive atmosphere. Alternatively, these entries shall be transported under temperature control in refrigerated cargo transport units that comply with the provisions of 7.3.7.6.

When cargo transport units with venting devices are used, these devices shall be kept clear and operable.

When mechanical devices are used for ventilation, they shall be explosion-proof to prevent ignition of flammable vapours from the substances.

Where the substance is loaded in closed cargo transport units, special attention shall also be paid to the provisions of 7.3.6.1.

Cargo transport units shall be marked with a warning mark including the words “CAUTION – MAY CONTAIN FLAMMABLE VAPOUR” with lettering not less than 25 mm high. This mark shall be affixed at each access point in a location where it will be easily seen by persons opening or entering the cargo transport unit and shall remain on the cargo transport unit until the following provisions are met:

- (a) The cargo transport unit has been ventilated for one hour to remove the hazardous concentration of vapour or gas.
 - (b) In the immediate vicinity of the cargo transport unit there is no source of ignition.
 - (c) The goods have been unloaded.
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