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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

Forty-fifth session
Geneva, 23 June – 02 July 2014
Item 4 (b) of the provisional agenda
Listing, classification and packing:
Classification inconsistencies (application of criteria versus dangerous goods list)

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Transmitted by the European Chemical Industry Council (CEFIC)[1]

Introduction

1. In the report of the Sub-Committee on its forty-third session held in Geneva from 24 to 28 June 2013 (ST/SG/AC.10/C.3/86), the following summary on the discussion is shown:

> ### B. Classification inconsistencies (application of criteria versus dangerous goods list)
>
> Informal document: INF.15 (CEFIC)
>
> 38. It was pointed out that the procedures for assigning a product to a UN number were explained clearly in chapter 2.0 of the Model Regulations. If a dangerous product was mentioned by name in the Dangerous Goods List, the transport conditions specified for that product should be applied irrespective of whether the name and description accounted for all hazards posed by the substance. Others believed a more appropriate name and description should be selected (for example an n.o.s entry) that reflected all hazards posed by the substance and related transport

[1] In accordance with the programme of work of the Sub-Committee for 2013–2014 approved by the Committee at its twenty-sixth session (see ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

conditions. It was recognized that if new data on the dangerous properties of a product mentioned by name identified additional hazards, the new data should be submitted, using the form in Figure 1 of the Recommendations, for the Sub-Committee to decide on a new classification and the appropriate transport conditions. **ICCA was requested to prepare a text for the Guiding Principles to indicate the procedure to be followed until the classification was updated, particularly when there were differences between the labelling for transport and the labelling required under other regulations.**

Note: since CEFIC submitted INF.15, it is CEFIC and not ICCA who should have been reported.

2. Based on this text highlighted above the following proposals have been developed. There are 2 possibilities to add text to the guiding principles: in Part 2 and in Part 3. For both Parts a proposal has been developed, but only one should be implemented.

3. The new proposal is based on the discussion we had in December and on the fact that there have been changes to substances listed by name in the past and there was no interim classification for these substances, although the additional classes discussed were class 6.1 and class 8. Therefore CEFIC sees no need to have an interim solution. The substances listed by name have all been listed for many years and the classifications and the transport conditions have proven to be safe.

4. Beside this it is questionable whether all hazards need to be communicated for transport. It seems that there is a principle of "Precedence of hazards", which is applied in transport to avoid numerous labels, which may confuse the people involved in a transport. In most cases the number of classes is limited to 3. If this principle would no longer apply, a huge number of new UN numbers would need to be generated to cover all possible combinations of classes.

5. The comments in the proposed text regarding the examples need not to be taken into the final text, but have been added to explain the examples. The examples shall only show that the assignment of a class / division or the packing group is not always based on the strict application of the classification criteria, but that other aspects are taken into consideration. This leads to stricter or less strict assignment. **There is NO request to change any of these classifications or a judgement on the classification and assigned packing groups.**

6. Similar text may be needed in the Model Regulations, combined if needed with some theoretical examples.

Proposal

7. In the part 2 "Classification" of the "Guiding principles for the development of the UN model regulations", after the following text,

…

8. When these definitions are used with the list of proper shipping names for dangerous goods, they provide guidance to those who are responsible for classifying substances; and a notable degree of standardization while retaining a flexibility that allows diverse situations to be taken into account. Classifications for substances in the Model Regulations are made on the basis of consideration of data submitted to the Sub-Committee of Experts on the Transport of Dangerous Goods by governments, intergovernmental organizations and other international organizations in the form recommended in Figure 1. However the actual data submitted are not formally endorsed by the Sub-Committee.

…

add:

The substances and articles listed by name in column 2 of the list shall be transported as listed, according to their classification in the list, unless and until the subcommittee of experts on TDG provides an updated list, based on new or additional data provided by TDG experts (e.g. National authorities, Industry stakeholders). A class or a packing group may have been assigned to describe the transport conditions rather than to reflect the classification. For products having more than two hazards, normally the two predominant hazards need to be communicated only. In certain cases it may even be necessary to communicate just one hazard (e.g. explosives, self-reactive substances, pyrophoric liquids, etc.). The precedence of hazard characteristics should be taken from the precedence of hazard table (see chapter 2.0.3).

Examples for this are provided in the following:

UN1230 METHANOL, 3 (6.1), PG II

UN1547 ANILINE, 6.1, PG II

UN1577 CHLORODINITROBENZENES, LIQUID, 6.1, PG II

UN1578 CHLORONITROBENZENES, SOLID, 6.1, PG II

UN1590 DICHLOROANILINES, LIQUID, 6.1. PG III

UN1591 o-DICHLOROBENZENE, 6.1 PG III

UN1661 NITROANILINES, 6.1, PG II

UN1662 NITROBENZENE, 6.1, PG II

UN1663 NITROPHENOLS, 6.1, PG III

UN1671 PHENOL, SOLID, 6.1, PG II

UN1673 PHENYLENEDIAMINES, 6.1 PG III

UN1708 TOLUIDINES, LIQUID, 6.1, PG II

UN2023 EPICHLORHYDRINE, 6.1 (3), PG II

UN2078 TOLUENE DIISOCYANATE, 6.1, PG II

UN2311 PHENETIDINES, 6.1, PG III

UN2432 N, N-DIETHYLANILINE, 6.1, PG III

UN2474 THIOPHOSGEN, 6.1, PG I

UN2512 AMINOPHENOLS, 6.1, PG III

UN3409 CHLORONITROBENZENES, LIQUID, 6.1, PG II

UN3441 CHLORONITROBENZENES, SOLID, 6.1, PG II

UN3442 DICHLOROANILINES, SOLID, 6.1, PG II

UN3451 TOLUIDINES, SOLID, 6.1, PG II

UN3458 NITROANISOLE, SOLID, 6.1, PG III

UN3495 IODINE, 8 (6.1), PG III

SP 279: This substance is assigned to this classification or packing group based on human experience rather than the strict application of classification criteria set out in these regulations.

UN3268 SAFETY DEVICES, electrically initiated, 9

This entry applies to safety devices for vehicles, vessels or aircrafts, e.g. air bag inflators, air bag modules, … which contains class 1 or other classes … (see SP 280), but the transport conditions of class 9 have been applied by the UN Sub Committee of experts TDG (the test series 6(c) of Part 1 of the Manual of Test and Criteria has been used to show that no explosion of the device or no fragmentation of the device casing or pressure receptacle, and no projection hazard nor thermal effect which would significantly hinder fire-fighters or emergency respond efforts in the immediate vicinity takes place).

UN3480 LITHIUM ION BATTERIES, 9 and

UN3090 LITHIUM METAL BATTERIES, 9

The transport conditions described in class 9 are sufficient for a safe transport

UN2212 BLUE ASBESTHOS or BROWN ASBESTOS, 9, PG II

UN2315 POLYCHLORINATED BIPHENYLS, LIQUID, 9, PG II

UN2590 ASBESTOS CHRYSOTILE, 9, PG III

UN3432 POLYCHLORINATED BIPHENYLS, SOLID, 9, PG II

UN2729 HEXACHLOROBENZENE, 6.1, PG III

UN2730 NITROANISOLES, LIQUID, 6.1, PG III

These substances pose a chronic hazard to the health, but to guarantee the correct transport conditions, class 9 or 6.1 is assigned.