

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

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Item 6 (f) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: other miscellaneous proposals

Review of the wording of certain amendments to the 18th revised edition of the Model Regulations

Transmitted by the International Air Transport Association (IATA)

Introduction

1. During the review of the amendments to the 18th revised edition of the Model Regulations as part of the development of changes for the ICAO Technical Instructions some issues were noted in some terms used in the amendments as follows:
2. New text was adopted into Chapter 2, 2.2.4, 2.3.5, 2.6.2.5 and 2.8.3 to address substances that may be subject to dangerous decomposition or polymerization. In each new paragraph the opening sentence reads “Chemically unstable ... of ... shall not be accepted for transport unless the necessary precautions ...”.
3. The use of the term “accepted for transport” here is questioned as this implies that there is somehow a responsibility of the carrier to perform some validation, notwithstanding that responsibility for ensuring that these substances are safe for transport rests with the consignor. It is believed that the sentence should read instead “Chemically unstable ... of ... shall not be consigned for transport unless the necessary precautions ...”.
4. Special Provision 2014 was revised to include a new paragraph that reads in part “... those manufactured before 31 December 2016 may be carried until 1 January 2019 without a “TOXIC” subsidiary labelling label”.
5. The use of the word “carried” here implies that the actual movement in transport of these articles must not extend beyond 1 January 2019. The actual duration of transport from the consignor to the consignee varies significantly depending on the mode of transport and of course the distance between the consignor and consignee.
6. It is suggested that only the manufacturer will have knowledge of the properties of the article and therefore the limitation in the special provision should be on date at which these articles can no longer be consigned for transport rather than carried. It is believed that the sentence should read instead “... those manufactured before 31 December 2016 may be consigned for transport until 31 December 2018 without a “TOXIC” subsidiary labelling label”.

Proposal

7. The Subcommittee is invited to consider the issues identified above to decide if these should be considered for inclusion through a corrigendum to the 19th revised edition of the Model Regulations, and also for advice to the modal bodies for inclusion into the next revision to the international modal regulations.

8. Revise 2.2.4 as follows:

“2.2.4 Gases not accepted for transport

Chemically unstable gases of Class 2 shall not be ~~accepted-consigned~~ for transport unless the necessary precautions have been taken to prevent the possibility of a dangerous decomposition or polymerization under normal conditions of transport or unless transported in accordance with special packing provision (r) of packing instruction P200 (4) of 4.1.4.1, as applicable. For the precautions necessary to prevent polymerization, see special provision 386 of Chapter 3.3. To this end particular care shall be taken to ensure that receptacles and tanks do not contain any substances liable to promote these reactions.”.

9. Revise 2.3.5 as follows:

“2.3.5 Substances not accepted for transport

Chemically unstable substances of Class 3 shall not be ~~accepted-consigned~~ for transport unless the necessary precautions have been taken to prevent the possibility of a dangerous decomposition or polymerization under normal conditions of transport. For the precautions necessary to prevent polymerization, see special provision 386 of Chapter 3.3. To this end particular care shall be taken to ensure that receptacles and tanks do not contain any substances liable to promote these reactions.”.

10. Revise 2.6.2.5 as follows:

“2.6.2.5 *Substances not accepted for transport*

Chemically unstable substances of Division 6.1 shall not be ~~accepted-consigned~~ for transport unless the necessary precautions have been taken to prevent the possibility of a dangerous decomposition or polymerization under normal conditions of transport. For the precautions necessary to prevent polymerization, see special provision 386 of Chapter 3.3. To this end particular care shall be taken to ensure that receptacles and tanks do not contain any substances liable to promote these reactions.”.

11. Revise 2.8.3 as follows:

“2.8.3 Substances not accepted for transport

Chemically unstable substances of Class 8 shall not be ~~accepted-consigned~~ for transport unless the necessary precautions have been taken to prevent the possibility of a dangerous decomposition or polymerization under normal conditions of transport. For the precautions necessary to prevent polymerization, see special provision 386 of Chapter 3.3. To this end particular care shall be taken to ensure that receptacles and tanks do not contain any substances liable to promote these reactions.”.

12. Special Provision 204 revise the last paragraph as follows:

“Articles containing smoke-producing substance(s) toxic by inhalation according to the criteria for Division 6.1 shall be labelled with a “TOXIC” subsidiary risk label (Model No 6.1, see 5.2.2.2.2), except that those manufactured before 31 December 2016 may be ~~carried until 1 January 2019~~consigned for transport until 31 December 2018 without a “TOXIC” subsidiary label.”
