



**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****Fifty-fourth session**

Geneva, 26 November-4 December 2018

Item 6 of the provisional agenda

**New proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods****Editorial corrections to the Model Regulations****Transmitted by the expert from Germany*****Introduction**

1. Special provision 172 (d) should be amended to further align the wording with column (3) of the dangerous goods list. The term “subsidiary class” is not used in the context of the Model Regulations.
2. P200 (3) (c) refers to the “filling factor”. The term “filling factor” is not used in the context of the Model Regulations and could be misunderstood as being different from the defined term “filling ratio”.
3. P300 (1) last sentence and (2) last sentence limit the total amount of fuel “per unit and package”. The term “unit” should be replaced with “primary containment” to be in line with the first sentence of each paragraph.
4. Some inconsistencies were noted with regard to the use of the terms “solid plastics” and “rigid plastics”. It seems that the term solid plastics is mainly used in provisions on packagings and large packagings, see in particular the packing instructions and chapter 6.1 and 6.6 which refer to 4H2 boxes as “plastics, solid (4H2)”, to 6HH” and 6PH2 composite packagings as “in solid plastics box/packaging” and to 50H large packagings as “rigid plastics”. The term rigid plastics is used in the intermediate bulk container (IBC) packing instructions and in chapter 6.6. But there is no strict distinction between packagings and large packagings on the one side and IBCs on the other side: For example, PP63 mentions rigid plastics and, P800 and P804 refer to rigid plastic as inner packaging. There seems to be no difference in the meaning, the German versions of ADR and RID translate both terms in the same way (“starr”). This document does not contain specific proposals as the Sub-Committee should have a general discussion on this issue first.

* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, para. 14).

Proposals for amendments

5. In Special provision 172 (d), replace “subsidiary class or division” by “subsidiary hazard or division”.
6. In P200 (3) (c), delete “(filling factor)”.
7. In P301 (1) last sentence, replace “unit” by “primary containment”. In P301 (2) last sentence, replace “unit” by “primary containment”.

Proposal for consideration

8. The Sub-Committee is invited to consider whether the use of language with regard to solid/rigid plastics should be unified.
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