



**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-sixth session**

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Item 6 (e) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods:
other miscellaneous proposals****Corrections to the steel types to be used for classifying for
corrosivity****Transmitted by the expert from Belgium*****Introduction**

1. At the fifty-fourth session of the Sub-Committee of Experts on the Transport of Dangerous Goods, Belgium presented informal document INF.15 in which it was explained that there is a difference between the English and the French versions of paragraph 2.2.8.3 c) ii) of the Model Regulations. The English version allows testing for corrosivity to be performed on steel type Unified Numbering System (UNS) G10200 or a similar type. The French version on the other hand does not mention the wording “or similar type” and thus was more restrictive than the English text (see underlined text).

English text paragraph 2.2.8.3 c) ii) of the Model Regulations

For the purposes of testing steel, type S235JR+CR (1.0037 resp. St 37-2), S275J2G3+CR (1.0144 resp. St 44-3), ISO 3574 or Unified Numbering System (UNS) G10200 or a similar type or SAE 1020, and for testing aluminium, nonclad, types 7075-T6 or AZ5GU-T6 shall be used. An acceptable test is prescribed in the Manual of Tests and Criteria, Part III, Section 37.

* In accordance with the programme of work of the Sub-Committee for 2019–2020 approved by the Committee at its ninth session (see ST/SG/AC.10/C.3/108, paragraph 141 and ST/SG/AC.10/46, paragraph 14).

French text paragraph 2.2.8.3 c) ii) of the Model Regulations

Pour les épreuves sur l'acier, on doit utiliser les types S235JR+CR (1.0037, respectivement St 37-2), S275J2G3+CR (1.0144, respectivement St 44-3), ISO 3574, "Unified Numbering System" (UNS) G10200 ou SAE 1020, et pour les épreuves sur l'aluminium les types non revêtus 7075-T6 ou AZ5GU-T6. Une épreuve acceptable est décrite dans le Manuel d'épreuves et de critères, troisième partie, section 37.

2. As explained in INF.15, the secretariat provided information that the mention "or similar type" was in both language versions of the original proposal, which was adopted between square brackets during the twenty-first session of the Sub-Committee of Experts on the Transport of Dangerous Goods. Nevertheless, during the twenty-second session these texts were re-examined on the basis of an informal document that did not contain the mention "or similar type" in neither of the language versions. Additionally the mention "or similar type" could also not be retrieved in the consolidated list of amendments to the twelfth edition of the Model Regulations on the Transport of Dangerous Goods that was adopted after the twenty-second session.

3. Based on the information given by the secretariat, it was concluded that this was an editorial error and that the mention "or similar type" was accidentally not deleted from the English version of the revised texts. As such in document INF.15 presented at the fifty-fourth session, Belgium proposed to delete the mention "or similar type" in the English version of the text in paragraph 2.2.8.3 c) ii).

4. During the discussion at the fifty-fourth session, it was agreed that this difference in wording could indeed lead to a different application of paragraph 2.2.8.3 c) ii) but several delegations were reluctant to accept the proposal as such, since they wanted to check with their stakeholders whether deleting this notion would not cause problems for them. Additionally the representative of IMO drew attention to the fact that work on corrosivity was going on for the IMSBC Code, that was expected to be presented in September 2019 and thought it might be good to consider the outcome of this work in the light of updating the paragraph (see report at the fifty-fourth session, ST/SG/AC.10/C.3/108, paras. 118-120).

5. Additionally some experts pointed out that the mention "or similar type" was also not present in the corresponding texts of the French and English versions of the Manual of Tests and Criteria section 37, paragraph 37.4.2 where the procedures to be followed for testing corrosivity and the steel types to be used are listed.

English text in paragraph 37.4.2 of the Manual of Tests and Criteria

Steel type S235JR+CR (1.0037, resp. St 37-2), S275J2G3+CR (1.0144, resp. St 44-3), ISO 3574, Unified Numbering System (UNS) G10200 or SAE 1020 (see Figure 37.4.1)

French text paragraph 37.4.2 of the Manual of Tests and Criteria

Acier des types S235JR+CR (1.0037, respectivement St 37-2), S275J2G3+CR (1.0144, respectivement St 44-3), ISO 3574 ou G10200 du système UNS (Unified Numbering System).

6. Given the feedback received from the secretariat on how these paragraphs were written and revised and given the fact that the mention "or similar type" is also not present in neither of the corresponding texts of the Manual of Tests and Criteria, Belgium still consider this to be an editorial error and as such proposes to delete the mention "or similar type" from the English version of the text in paragraph 2.2.8.3 c) ii).

7. While reviewing paragraph 37.4.2 of the Manual of Text and Criteria, it was also noted that the English and the French text of this paragraph do not correspond. Firstly, the English texts refers to the unexisting figure 37.4.1 while the French text does not (see

underlined text in paragraph 5). Belgium also consider this an editorial error and, as such, proposes to delete the reference from this paragraph.

8. More importantly, the French text of paragraph 37.4.2 does not refer to UNS SAE 1020. Which is in contrast with the other relevant paragraphs already mentioned in this document. As such, in our third proposal it is proposed to align the French version of paragraph 37.4.2 with the text of paragraph 2.2.8.3 c) ii) of the Model Regulations (for comparison, see paragraph 1 of this document).

Proposal 1

9. Amend the second sentence of paragraph 2.8.3.3 c) ii) in the English version of the Model Regulations as follows (deleted text struck through)

For the purposes of testing steel, type S235JR+CR (1.0037 resp. St 37-2), S275J2G3+CR (1.0144 resp. St 44-3), ISO 3574 or Unified Numbering System (UNS) G10200 or ~~a similar type or~~ SAE 1020, and for testing aluminium, nonclad, types 7075-T6 or AZ5GU-T6 shall be used.

Proposal 2

10. Amend the second indent in paragraph 37.4.2 in the English version of the Manual of Tests and Criteria as follows (deleted text struck through)

Steel type S235JR+CR (1.0037, resp. St 37-2), S275J2G3+CR (1.0144, resp. St 44-3), ISO 3574, Unified Numbering System (UNS) G10200 or SAE 1020 ~~(see Figure 37.4.1).~~

Proposal 3

11. Amend the second indent in paragraph 37.4.2 in the French version of the Manual of Tests and Criteria as follows (new text underlined, deleted text struck through)

Acier des types S235JR+CR (1.0037, respectivement St 37-2), S275J2G3+CR (1.0144, respectivement St 44-3), ISO 3574, ~~ou G10200 du système~~ UNS (Unified Numbering System) G10200 ou SAE 1020.