

**Committee of Experts on the Transport of Dangerous Goods  
and on the Globally Harmonized System of Classification  
and Labelling of Chemicals**

**28 June 2019**

**Sub-Committee of Experts on the Transport of  
Dangerous Goods**

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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**

**Comments on ST/SG/AC.10/C.3/2019/22 regarding  
paragraph 4.1.5.2 c)**

**Transmitted by the expert from Canada**

**Introduction**

1. In reviewing document ST/SG/AC.10/C.3/2019/22, the expert from Canada noted that for paragraph 4.1.5.2 c) of the Model Regulations, it appears that the clarification goes beyond the choice of the word “hazard” or “risk”.
2. Paragraph 4.1.5.2 c) states “The packages will withstand any loading imposed on them by foreseeable stacking to which they will be subject during transport so that they do not add to the risk presented by the explosives, the containment function of the packagings is not harmed, and they are not distorted in a way or to an extent which will reduce their strength or cause instability of a stack”.
3. The meaning of “so that they do not add to the risk presented by the explosives” is unclear. As mentioned in document ST/SG/AC.10/C.3/2019/22, for transport, the word “risk” refers to the probability of an event multiplied by the consequence, and the word “hazard” refers to the inherent properties of the substance. Therefore, it would appear that the correct word in regards to the explosives would be “hazard” as we refer to the inherent properties of the explosives. However, the paragraph is in fact referring to an increased probability of an event as a result of the stacking of the packages, and not the inherent nature of the explosives.
4. As the word “risk” would be the correct word to address the issue related to the stacking of packages, it appears that the word “explosives” should be replaced by the words “unintended ignition, initiation or rupture of the package” to be consistent with the wording used in the rest of the Chapter, which are associated with the risk of an event related to the stacking of packages. Therefore, the experts from Canada suggest to change the wording of paragraph 4.1.5.2 c).

## Proposal

5. Modify the text of paragraph 4.1.5.2 c) as follows (new proposed text in underline and deleted text in ~~strikethrough~~):

*“The packages will withstand any loading imposed on them by foreseeable stacking to which they will be subject during transport so that ~~they~~the packages do not cause an increase in the risk of unintended ignition, initiation or rupture of the package presented by the explosives, the containment function of the packagings is not harmed, and ~~they~~the packages are not distorted in a way or to an extent which will reduce their strength or cause instability of a stack.”*

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