

CETDG/21/INF.5

**COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS**
(Twenty-first session, 4-12 December 2000
agenda item 2 (b))

WORK OF THE SUB-COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Draft Amendments to the Recommendations on the Transport of Dangerous Goods

Documentation for the Transport of Dangerous Goods

Transmitted by the Hazardous Materials Advisory Council (HMCA)

Discussion

1. At the 18th session of the Sub-Committee of Experts on the Transport of Dangerous Goods (July 2000), the Sub-Committee approved a change in the sequence of information on transport documents. In the revised sequence, the UN number would appear first. During the discussions in July and the previous December on this issue, no safety-related arguments were offered by those Experts supporting this change. To the contrary, since the IMDG Code, ICAO Technical Instructions and a number of national regulations follow the present provisions in the Model Regulations with respect to sequence, such a change is likely to cause confusion among those in the transport chain that follow those provisions for worldwide air and sea transport. In HMCA's view, a revision of the sequence could well result in a decreased level of safety. In addition, there would be considerable cost in both re-programming computer systems to accommodate the new sequence and in the re-training of employees. We have received cost estimates from member companies of well over USD 500,000 / Euro 600,000 per company to revise computer systems and re-train employees. Company forms, contracts, manuals, and emergency response guides also would need to be revised at additional cost.

2. We agree with the conclusions in the IATA paper (ST/SG/AC.10/2000/36) that there are no significant benefits to making such a revision, only potential safety problems and considerable expense. HMCA believes that changes affecting worldwide transport should not be adopted to accommodate regional requirements unless a well-defined safety improvement can be demonstrated.

3. At the October 2000 meeting of the ICAO Dangerous Goods Panel Working Group, a number of members expressed serious concern about the proposed change and agreed, by a large majority, that ICAO would not support this action.

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Proposal

4. HMAC strongly supports the conclusion by IATA that a case for improved safety in transport has not been made with respect to a revision of the sequence. We ask that the Committee carefully consider the adverse safety and economic ramifications of this draft amendment and retain the sequence as it presently appears in the Model Regulations.
