

**COMMITTEE OF EXPERTS ON THE TRANSPORT
OF DANGEROUS GOODS**

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

**(Geneva, 5-16 July 1999,
agenda item (6))**

**DRAFT AMENDMENTS TO THE MANUAL
OF TESTS AND CRITERIA**

Comments on ST/SG/AC.10/C.3/1999/31

Transmitted by the expert from the United States of America

1. The Sub-Committee will recall that over the past four years the Committee has worked to revise the test prescription and the criteria for the 6(c) test of the Manual of Tests and Criteria. The conclusion of this work is reflected in document ST/SG/AC.10/14. In doing so specific criteria for classifying products to Division 1.4 and a compatibility group other than “S” and to Division 1.4S were developed. These are now reflected in paragraphs 16.6.1.4.5 and 16.6.1.4.6 of the Test Manual (see ST/SG/AC.10/14).
 2. The expert from the United States regards the criteria for 1.4S in the revised 6(c) test taken together with the criteria that are already included in the 6(a) and 6(b) tests as comprehensive and does not consider there to be a need for further refinement of the 1.4S criteria. On this basis the expert from the United States can not support the proposal by the experts from Canada and Germany in document ST/SG/AC.10/C.3/1999/31.
 3. It is recognized that there may be some variation in the interpretation of the note under 2.1.1.4(d) in the Model Regulations which takes into account “hazardous effects” of the product arising from accidental functioning. With the revisions that have been introduced in the 6(c) test, the expert from the United States believes that the hazardous effects referred to in the note to 2.1.1.4(d) should be regarded as the same effects that are used to define 1.4S in the 6(c) test.
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