

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Eighteenth session, 3-12 July 2000,
agenda item 5)

MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

EDITORIAL AND TECHNICAL AMENDMENTS TO THE UN MODEL REGULATIONS

COMMENTS ON PROPOSAL ST/SG/AC.10/C.3/2000/5, Editorial and Technical Amendments to UN Model Regulations, IMO

Submitted by the European Chemical Industry Council (CEFIC)

1. INTRODUCTION

The IMO secretariat submitted a proposal on editorial and technical amendments to the UN Model Regulations. The intent was to maintain consistent requirements in the UN Model regulations and the IMDG Code. Concerning the proposals on Part 4, Chapter 4.1, Organic Peroxides and Self-Reactive Substances, CEFIC is of the opinion that some of the proposed changes are not only of an editorial nature, but will change transport requirements in the current UN Model Regulations. In this information paper some proposals are given to correct inconsistencies and to improve technical descriptions to bring them in line with the current UN Model Regulations.

2. PROPOSALS

On proposal ST/SG/AC.10/C.3/2000/5:

Part 4, Chapter 4.1, 4.1.7.0, General,

Proposal 1:

Delete proposed 4.1.7.0.1: "The packaging of an organic peroxide or self-reactive substance required to bear a subsidiary risk label of Class 1 shall comply with the provisions in 4.1.5.)"

Renumber proposed 4.1.7.0.2 to 4.1.7.0.1.

Justification:

Only part and certainly not all of the provisions of 4.1.5. are applicable to these organic peroxides or self-reactive substances. In packing instruction P520, Additional requirements, number 4, references are made to the relevant parts of 4.1.5.

Proposal 2:

Delete 4.1.7.2.3: “Emergencies to be taken into account are:

- .1 for an organic peroxide, the self-accelerating decomposition of the organic peroxide and fire engulfment; and
- .2 for a self-reactive substance of Class 4.1, the substance's ability to ignite easily from external sources such as sparks and flames and the likelihood of a strongly exothermic reaction caused by excessively high transport temperatures or by contamination.”

Justification:

*Emergencies described in proposed 4.1.7.2.3.2 are based on the product properties as described in 2.4.2.3.1.2. Essentially they are the same as for organic peroxides. The emergencies to be taken into account are identical for self-reactive substances as for organic peroxides. This is also incorporated in the IBC instruction IBC520, Additional requirement 2 (for both self-reactive substances and organic peroxides). Emergencies described in proposed 4.1.7.2.3.1 are applicable to both self-reactive substances and organic peroxides. These are covered in IBC520. **If desired**, the text can be integrated with proposed 4.1.7.2.5 (see proposal 4 of this document).*

Proposal 3:

Amend proposed 4.1.7.2.4 to be read:

For self-reactive substances temperature control is required according to 2.4.2.3.4. For organic peroxides temperature control is required according to 2.5.3.4.1. Provisions of temperature control provisions are given in 7.1.4.3.1.

Re-number proposed 4.1.7.2.4 to 4.1.7.2.3.

Justification:

*The criteria for the application of temperature control are **not** similar for self-reactive substances and organic peroxides.*

Proposal 4:

Insert (see justification proposal 2) as the first sentence in proposed 4.1.7.2.5:

Emergencies to be taken into account are self-accelerating decomposition and fire engulfment.

Re-number proposed 4.1.7.2.5 to 4.1.7.2.4.
