

## COMITE TECHNIQUE INTERNATIONAL DE PREVENTION ET D'EXTINCTION DU FEU

INTERNATIONAL TECHNICAL COMMITTEE FOR THE PREVENTION AND EXTINCTION OF FIRE

INTERNATIONALES TECHNISCHES KOMITEE FÜR VORBEUGENDEN BRANDSCHUTZ UND FEUERLÖSCHWESEN

# CTIF

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

### Limited Quantities

#### Comment on proposals to amend chapters 3.4 and 5.3 limited quantities ST/SG/AC.10/C.3/1999/56, ST/SG/AC.10/C.3/2000/9 and ST/SG/AC.10/C.3/2000/32

### General

The CTIF sees an urgent need for the proposed labelling for the sake of safety of emergency responders and personnel in the transport chain.

### Maximum Consignment Quantity

If the Committee do not wish to define a hazard related maximum consignment quantity of goods consigned as Limited Quantities that can be shipped without a placard 2000L/kg seems to be a reasonable amount.

However, from the perspective of the emergency responders a risk related maximum consignment quantity is preferable.

Under emergency conditions one has to judge the practical problems different from those under normal conditions. If a product is accidentally released the health hazard for operators in parcel services, local distribution, etc. as well as emergency responders are very much depending on the properties and quantities of the accidentally released product. This is also true for the means of response necessary on the scene to mitigate the impact of a release.

CTIF therefore suggest that the maximum consignment quantity should be risk related.

ADR marginals 10010 and 10011 define exempted quantities, which are allowed without any marking. CTIF believes that those definitions are very well elaborated and should be applied in principle here also.

Transports with limited quantities should be labelled if the gross mass exceeds the exempted quantities defined in marginal 10011 of the current ADR.

If the Committee has the opinion that the resulting maximum consignment quantities are too small CTIF believes that a multiplication factor **2** would be an acceptable compromise which would result in a maximum consignment quantity of 2000L/kg for most products.

### Transport Unit Placarding

CTIF supports the Australian proposal

