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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Sub-Committee of Experts on the Transport of Dangerous Goods

REPORT OF THE SUB-COMMITTEE OF EXPERTS ON ITS TWENTIETH SESSION

(Geneva, 3-11 December 2001)

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Annexes

REPORT

ATTENDANCE

1. The Sub-Committee of Experts on the Transport of Dangerous Goods held its twentieth session from 3 to 11 December 2001 with Mr. S. Benassai (Italy) as Chairman and Mr. F. Wybenga (United States of America) as Vice-Chairman; 3 and 4 December were reserved exclusively for the work of a working group on the transport of gases.

2. Experts from the following countries took part in the session: Argentina; Australia; Austria; Belgium; Brazil; Canada; China; Czech Republic; Finland; France; Germany; Iran (Islamic Republic of); Italy; Japan; Mexico; Netherlands; Norway; Poland; South Africa; Spain; Sweden; United Kingdom; United States of America.

3. Under rule 72 of the rules of procedure of the Economic and Social Council, observers from the following countries took part: Bahamas; Portugal; Switzerland.

4. Representatives of the following specialized agencies were present: International Civil Aviation Organization (ICAO); International Maritime Organization (IMO); World Health Organization (WHO); International Atomic Energy Agency (IAEA).

5. The following intergovernmental organizations were also represented: European Commission; Intergovernmental Organization for International Carriage by Rail (OTIF).

6. Representatives of the following non-governmental organizations took part in the discussion of items of concern to their organizations: American Biological Safety Association (ABSA); Compressed Gas Association (CGA); European Committee of Paint, Printing Ink Artists Colours Manufacturer's Associations (CEPE); European Industrial Gases Association (EIGA); European Liquefied Petroleum Gas Association (AEGPL); European Cylinder Makers Association (ECMA); European Secretariat of Manufacturers of Light Metal Packagings (SEFEL); Hazardous Materials Advisory Council (HMAC); International Air Transport Association (IATA); International Confederation of Container Reconditioners (ICCR); International Confederation of Plastics Packaging Manufacturers (ICPP); International Council of Intermediate Bulk Container Associations (ICIBCA); International Association of the Soap, Detergent and Maintenance Products Industry (AISE); International Confederation of Drums Manufacturers (ICDM); International Council of Chemical Associations (ICCA); International Federation of Freight Forwarders Associations (FIATA); International Organization for Standardization (ISO); International Union of Railways (UIC).

7. The Director of the Transport Division of the Economic Commission for Europe (UNECE), Mr. José Capel Ferrer, informed participants that the personnel resources scheduled in the proposed UNECE budget for the 2002-2003 biennium for activities relating to the reconfiguration of the Committee and the establishment of a new Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals comprised a Professional post (P4) to be filled, but that temporary assistance only would be provided for the General Service (GS) post initially requested; all of this was subject to endorsement by the General Assembly which had still to discuss and adopt the United Nations budget for 2002-2003 before the end of the year.

8. He also informed the Sub-Committee that the draft resolution submitted by the Economic and Social Council at its substantive session (July 2001) contained in the report of the Secretary-General (E/2001/44) had been the subject of discussion and that the Group of 77 developing countries and China had submitted a different draft resolution. A compromise had ultimately been found and the Council had adopted resolution 2001/34 on 26 July 2001 (see INF.44), but had decided to postpone the continuation of consideration of the report of the Secretary-General until the resumption of its substantive session of 2001. Consideration of the report had still not been resumed. He stressed that discussion of the resolution within the Council appeared to be linked to the unfamiliarity of delegations to the Council with the activities and role of the Committee. He therefore invited all experts to aim at better communication with their countries' representatives to the Council and to ensure that those representatives were duly informed about the importance of the Committee's work on the safety of the transport of dangerous goods and the facilitation of international trade, particularly in the case of countries belonging to the Group of 77 and China.

9. The expert from Argentina indicated that there was coordination between countries belonging to the Group of 77 and China that are members of the Committee and their representatives at the Council sessions. Noting that more information is needed for countries that are not members of the Committee, she invited all experts and the secretariat to improve communication with representatives of countries which are not members of the Committee and, as a consequence, are not always fully aware of the implications of its work.

ADOPTION OF THE AGENDA

Documents: ST/SG/AC.10/C.3/39 and -/Add.1

Informal documents: INF.1 and INF.2

10. The Sub-Committee adopted the provisional agenda prepared by the secretariat, after amending it to include late submissions of informal documents (INF.1 to INF.50), except for informal document INF.28 which was replaced by informal document INF.28/Rev.1 (Belgium) and informal documents INF.6, INF.7 and INF.8 withdrawn by China.

ADDITIONAL PROVISIONS FOR THE TRANSPORT OF GASES

Documents: ST/SG/AC.10/C.3/34 - Report seventeenth session
ST/SG/AC.10/C.3/36 - Report eighteenth session
ST/SG/AC.10/2000/22 (EIGA)
ST/SG/AC.10/C.3/2001/31 (United States of America)
ST/SG/AC.10/C.3/2001/48 (EIGA)

Informal documents: INF.12 (EIGA)
INF.13 (Canada)
INF.31 (Germany)
INF.33 (United Kingdom)
INF.34 (Canada)
INF.46 (Sweden)
INF.48 (Report of the Working Group)

11. As scheduled by the Committee and as agreed at the last session (ST/SG/AC.10/C.3/38, para.15), a Working Group on the transport of gases met in parallel with the session, from 3 to 5 December 2001, to consider the questions raised in the annex to document ST/SG/AC.10/C.3/2001/31 and questions which had not been resolved during the previous biennium.

12. The Sub-Committee took note of the Working Group's report (see annex 1); the texts resulting from the work of the Group are annexed to this report for consideration at the next session.

13. In response to a question from the expert from Norway, the representative of EIGA, the Chairman of the Working Group, said that provisions relating to holding time had not been provided for cryogenic receptacles, unlike the case of tanks, because transport for these receptacles was generally of very brief duration.

14. Noting that packing instruction P202 had been deleted, the Sub-Committee agreed that it should be "reserved".

15. With reference to the label for cryogenic liquids for which the IATA Regulations provided, the Sub-Committee noted that it was of little interest in the case of closed cryogenic receptacles since the vapour could not escape. In any case, some experts were of the opinion that questions of labels should from now on be discussed in the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals.

16. With regard to the Working Group's recommendations contained in paragraphs 22 and 23 of the report, the representative of EIGA would consult the secretariat on matters of consistency with editing rules, terminology in the Model Regulations overall and possible implications for other chapters or sections.

Informal documents: INF.12 (AEGPL)
INF.46 (Sweden)

17. The Sub-Committee agreed that the authors of these proposals should submit them in the form of official documents.

Informal document: INF.42 (ISO)

18. The Sub-Committee took note of the information provided by the representative of ISO on the programme of work of technical committee TC58 (receptacles for gases).

Informal document: INF.33 (United Kingdom)

19. Several delegations considered that it was not appropriate to include additional provisions in the Model Regulations permitting the transport of gas cylinders for specific uses (e.g. for hot air balloons) since that could encourage future proposals to introduce new special provisions for each specialized type of cylinder, although transport operations of this nature remained relatively marginal at the international level.

20. It was also stressed that the transport of cylinders of this type was already covered by a multilateral agreement (M 74) under ADR and that paragraph 6.2.1.1.2 of the Model Regulations covered the possibility of transporting certain types of cylinders which were not listed in the Model Regulations.

21. Some experts asserted that the authorization to carry certain types of cylinder was the responsibility of the competent authorities concerned and that it was not necessary to introduce new provisions in this regard into the Recommendations. Moreover, these cylinders were not generally transported full but were filled in the vicinity of their place of use.

22. The representative of the United Kingdom said that these cylinders were indeed transported both filled and partially filled internationally and that appropriate provisions needed to be drawn up in order to settle practical problems. Noting that one delegation did not oppose the principle of the proposal but regretted that complete construction requirements reflecting an appropriate safety level had not been proposed, he said that he would submit an official proposal at the next session on the basis of the comments made during the discussion.

TANKS

Safety devices for portable tanks

Document: ST/SG/AC.10/C.3/2001/45 (Spain)

Informal document: INF.43 (Spain)

23. Following discussion of the document introduced by the expert from Spain, the latter withdrew his proposal and invited the experts of the Sub-Committee to correspond with him with a view to improving the wording of paragraph 6.7.2.12.1.

Transport of solids in portable tanks

Document: ST/SG/AC.10/C.3/2001/55 (United States of America)

Informal document: INF.38 (United States of America)

24. The Sub-Committee was by and large favourable to the idea of adding provisions for the transport of solids in tanks, and several delegations hoped that the work would be completed during the current biennium.

25. The representative of UIC noted that provisions already existed in RID and ADR and expressed the hope, as proposed by the United States of America, that a rational approach would be applied to the assignment of tank codes. He hoped that the work would be carried out in parallel with the work on the transport of solids in bulk since the rational approach should be similar.

26. The observer from the Bahamas pointed out that provisions for the transport of solids in portable tanks had been adopted by IMO and that they could be applicable as from 1 January 2003. He therefore hoped that the decisions taken on the basis of the rational approaches would not involve significant amendments to these provisions of the IMDG Code.

27. The expert from the United States of America considered that the decisions taken by IMO only constituted a first stage in the response to the immediate needs of maritime transport and that the fuller provisions proposed are the logical development.

28. Several delegations said that not only all cases of solids should be dealt with, in particular powdered or granular substances, but also substances in paste form or loaded in the molten state and then solidified.

29. Since the majority of the delegations had not had time to consider document INF.38 in detail, it was agreed that a correspondence group should be established led by the expert from the United States of America who would submit a new proposal at the next session.

Thermally activated closing mechanisms for internal valves on portable tanks

Document: ST/SG/AC.10/C.3/2001/56 (United States of America)

30. The proposal contained in paragraph 3 to clarify the use of the term "quick closing" was adopted.

31. The proposal contained in paragraph 5 to establish the minimum distance between the remote-controlled closing device and the filling or discharge opening was not adopted.

32. Several delegations expressed reservations about some aspects of this document, in particular, that the emergency closing mechanism could become mandatory for portable tanks intended for the carriage of flammable liquids of Class 3. A vote was taken and the proposal was not adopted.

33. The expert from the United States of America said that the proposals contained in his document formed a whole, and since some had not been adopted, the adoption of the proposal in paragraph 3 no longer had much significance. He therefore requested that the texts should remain as they were; the Sub-Committee agreed to this. He would possibly submit a new proposal.

Definitions (Design pressure, maximum allowable working pressure)

Informal document: INF.5 (UIC)

34. The expert from UIC informed the Sub-Committee that a working group had met to discuss the proposals contained in this document and that on conclusion of the discussion the group had arrived at a compromise on certain questions. He also said that a new document would be drafted and submitted at the next session on the basis of the agreement obtained on those questions.

TRANSPORT OF SOLID SUBSTANCES IN BULK IN CONTAINERS

Carriage of infectious substances in bulk

Document: ST/SG/AC.10/C.3/2001/38 (United Kingdom)

35. Most of the experts were in principle in favour of preparing specific provisions for the carriage of infectious substance in bulk (UN Nos. 2900 and 3291). After a discussion on the proposals put forward, the expert from the United Kingdom requested all interested delegations to send him their comments by the end of February 2002 so that he could prepare a new official proposal for the next session.

Document: ST/SG/AC.10/C.3/2001/37 (United Kingdom, Germany)

Informal documents: INF.36 (Norway)
INF.11 (ICCA)

36. The proposals related to the transport of solid substances in bulk containers were discussed by a lunchtime working group which met from 5 to 7 December under the chairmanship of the Vice-Chairman.

37. The Vice-Chairman informed the Sub-Committee that the working group had completed its tasks and that the outcome would be reflected in a revised document that would be submitted by Germany and the United Kingdom to the Sub-Committee at its next session. He said that ICCA would provide proposals for a rationalized approach in the next biennium.

PACKAGINGS (INCLUDING IBCs AND LARGE PACKAGINGS)

Document: ST/SG/AC.10/C.3/2001/40 (United Kingdom)

38. This proposal for a special packaging provision within packing instruction P403 followed on from the proposal contained in document ST/SG/AC.10/C.3/2001/17 discussed at the previous session. It was adopted with some amendments (see annex 2).

Special packing provision PP1

Document: ST/SG/AC.10/C.3/2001/43 (CEPE)

Informal document INF.19 (CEPE)

39. Several experts said that they opposed CEPE's proposal to exempt packages carried as palletized loads, boxes, pallets or other unit loads in accordance with special provision PP1 from the marking and labelling requirements of Chapter 5.2.

40. The representative of CEPE withdrew his proposal and said that he would submit a new proposal in the light of the comments made.

UN No. 2956 musk xylene, packing instruction P409

Document: ST/SG/AC.10/C.3/2001/49 (United Kingdom)

Informal document: INF.49 (Secretariat)

41. The proposal to delete special provisions 133 and 181 for UN No. 2956 was not adopted, since some experts considered that the explosive behaviour of musk xylene when closely confined in a packaging should be borne in mind.

42. The Sub-Committee admitted, nevertheless, that the wording of special provisions 133 and 181 was no longer very appropriate for this substance now that packing instruction P409 had been assigned to it, and a compromise solution was adopted on the basis of informal document INF.49 (see annex 2).

43. The expert from Germany said that he was unable to support the change of philosophy since the introduction of packing instruction P409. He considered that, as a general rule, the explosive property subsidiary risk label should be required, even for packagings covered by instruction P409, unless the competent authority was satisfied, on the basis of test data, that the substance as packed did not demonstrate explosive behaviour.

Instruction P407

Document: ST/SG/AC.10/C.3/2001/50 (United Kingdom)

44. The amendment proposed was adopted (see annex 2).

Note to paragraph 6.1.4.1.1

Document: ST/SG/AC.10/C.3/2001/52 (SEFEL)

45. The proposal submitted by SEFEL was adopted with some amendments (see annex 2).

Packaging of large lithium batteries

Document: ST/SG/AC.10/C.3/2001/54 (United States of America)

46. The proposal to modify instruction P903 was adopted with some amendments (see annex 2).

Drafting changes

Informal documents: INF.14 and INF.15 (United Kingdom)

47. The amendments proposed were adopted with some consequent changes (see annex 2).

Packagings for UN Nos. 3175, 3243 or 3244

Informal document: INF.16 (United Kingdom)

48. The expert from the United Kingdom took note of the various comments on this informal document and said that he would submit an official proposal to take them into account.

Instruction LP02, flexible large packagings

Informal document: INF.24 (ICCA)

49. The representative of ICCA was invited to submit an official proposal taking into account the comments made and furnishing more information on these new packagings.

UN Nos. 1910 and 2812

Informal document: INF.45 (Bahamas)

50. The observer from the Bahamas informed the Sub-Committee that a small working group had met to consider the situation of entries UN 1910 and 2812, which, according to the United Nations Recommendations, were applicable to air transport only and for which, in his opinion, provisions were not required in columns (7), (8) and (9) of the table in Chapter 3.2. One of these entries, had, however, been incorporated in the IMDG Code.

51. The Sub-Committee confirmed that these entries were intended only for transport by air and should not concern maritime transport. However, the recommendation of the small working group for the deletion of the requirements concerning packaging and limited quantities in columns (7), (8) and (9) should be submitted in writing as an official proposal for discussion.

TRANSPORT OF INFECTIOUS SUBSTANCES

Informal documents: INF.22 (Canada)
INF.41 (WHO)

52. The Sub-Committee noted that WHO had organized a meeting in Lyon, France, from 8 to 10 October 2001, to discuss the current regulations for the transport of infectious substances and diagnostic specimens, and intended to prepare a proposal of amendments to the Recommendations on the Transport of Dangerous Goods for submission to the next session of the Sub-Committee.

53. The Sub-Committee also noted that the expert from Canada had invited delegations to participate in an informal meeting in Lyon subsequently on 11 and 12 October 2001, and had prepared a draft revised section 2.6.3 reproduced in INF.22. The expert from Canada invited all delegations to provide comments on this draft revised text at their earliest convenience.

54. Some experts welcome the work undertaken by Canada since they considered that the existing regulations caused problems of implementation, as underlined in the WHO document. However, they regretted that not all experts of the Sub-Committee had been invited to participate

in the WHO meeting and underlined that any revision of current regulations would require a better cooperation with the Sub-Committee.

55. The expert from France proposed to organize, in cooperation with IATA, an informal meeting of a working group to discuss these issues during the IATA Conference to be held in Paris from 11 to 15 March 2002.

56. The expert from the United States of America expressed concern about WHO intending to submit their own proposal separately from the expert from Canada. He said that more cooperation with the Sub-Committee was needed, and that the first step for this work should be to explain clearly in writing where problems were with the current requirements. With a clear understanding of the problems, it could be possible to find solutions without having to redraft completely new regulations. He underlined that the present requirements of the UN Model Regulations for Class 6.2 were in the process of being made mandatory through national legislation in his country and re-addressing these issues substantially would delay considerably the legislative process. He said that the Canadian document raised a great number of substantial issues, including labelling, which went far beyond the resolution of potential implementation problems. Therefore, he was not in favour of convening a meeting of an informal working group without any mandate to discuss clearly identified issues. He considered that this work could be carried on in the next biennium.

57. The expert from Germany supported the views of the expert from the United States of America and underlined that basic changes would require a proper justification. He was in particular concerned by the deletion of Note 2 to 2.6.3.1.1 and of the concept of risk groups 2 and 3.

58. The expert from the United Kingdom recalled that the revision of the Class 6.2 provisions was part of the programme of work for the current biennium and that the expert form Canada had been mandated to co-ordinate this work.

59. The Sub-Committee finally agreed with the proposal by the expert from France to host an informal working group meeting from 11 to 13 March 2002 in Paris, on the understanding that document INF.22 and any other document submitted would be considered as a basis for discussion but not as a basis for proposal.

Notification for the transport of infectious substances

Informal document: INF.4 (Australia)

60. The Sub-Committee agreed that the examples of transport details to be notified by the consignor to the consignee in 5.5.1.2 (d) could be deleted.

61. Several experts supported the view that the notification measures indicated in 5.5.1.2 should be recommended measures rather than mandatory requirements. However, since the provisions contained in the Model Regulations are expected to be transformed into mandatory requirements through applicable legal instruments, the Sub-Committee agreed that the entire paragraph 5.5.1.2 should be deleted (see annex 2).

LISTING AND CLASSIFICATION

Correct assignment of UN Nos., proper shipping names and packing instruction numbers with respect to physical state

Informal document: INF.17 (Netherlands and Germany)

62. The experts from the Netherlands and Germany submitted the provisional results of their work concerning the correct assignment of UN numbers, proper shipping names and packing instructions to substances with respect to their physical state. They requested that delegates should transmit their comments on this document to them, particularly with reference to a criterion enabling the number of new entries to be inserted in the list of dangerous goods to be reduced.

63. They would prepare a revised proposal for the next session of the Sub-Committee on the basis of the comments received.

Aniline hydrochloride

Document: ST/SG/AC.10/C.3/2001/21 (Germany)

64. The expert from Germany withdrew this document.

Elevated temperature substances

Document: ST/SG/AC.10/C.3/2001/42 (United States of America)

Informal document: INF.35 (Canada)

65. The discussion showed that the question of transport of substances under elevated temperature was not extensively addressed in the Model Regulations, since classes other than Class 3 could also be covered. Furthermore, in Class 3, there was no entry for liquids with a flashpoint below 60.5 °C carried at elevated temperatures above their flashpoint.

66. The experts from the United States of America and from Canada said that they would submit new proposals for the next session.

Calcium hypochlorite

Documents: ST/SG/AC.10/C.3/2001/25 (South Africa)
ST/SG/AC.10/C.3/2001/25/Corr.1 (South Africa and Germany)

Informal documents: INF.3 (South Africa)
INF.26 (Germany)

67. Several experts did not support the various proposals concerning the classification of calcium hypochlorite tablets.

68. The experts from South Africa and Germany said that they would submit a new proposal taking account of the comments made to replace ST/SG/AC.10/C.3/2001/25/Corr.1. The expert from South Africa will submit a formal proposal to replace INF.3.

69. The expert from Germany requested that document INF.26 be carried forward for the next session as a background document for the test results. He requested all delegations to send him their comments by the end of February 2002.

Persalt sodium carbonate peroxyhydrate
Persalt sodium perborate monohydrate

Documents: ST/SG/AC.10/C.3/2001/35 (Germany)
ST/SG/AC.10/C.3/2001/36 (Germany)

70. The two proposals from Germany were adopted with some modifications (see annex 2).

Testing of liquid and solid substances according to their corrosive properties on steel and aluminium

Document: ST/SG/AC.10/C.3/2000/24 (Germany)

Informal document: INF.27 (Germany)

71. After a general discussion on the result of the two sessions of the informal working group hosted by the expert from Germany, the expert from Germany invited experts to submit comments before 15 February 2002 so that he could submit a proposal for the next session.

72. The Chairman recalled that this issue of classification of corrosive substances was also relevant for the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals.

Schematic classification of organometallic substances

Informal document: INF.20 (ICCA)

73. The representative of ICCA indicated that he would submit a formal proposal on this subject for the next session. Experts were invited to send him their comments.

74. The expert from the United States of America expressed concern at the fact that, according to this proposal, a number of well-known existing UN Numbers for organometallic substances would be deleted.

EXPLOSIVES, SELF-REACTIVE SUBSTANCES AND ORGANIC PEROXIDES

Classification criteria for fireworks

Informal documents: INF.9 (Netherlands)
INF.37 (United States of America)
INF.50 (China)

75. The Sub-Committee took note of the report of the informal working group held in the Hague (Netherlands) from 16 to 18 October 2001 at the invitation of the Government of the Netherlands, as well as of the comments made by the expert from the United States of America.

76. The Sub-Committee also noted the test results provided by the expert from China in INF.50.

77. The Sub-Committee agreed that the default system for classification of fireworks should be based on the test data available in all countries for the classification of existing fireworks, and that classification according to test results should always take precedence over the default classification.

78. There were divergent opinions as to whether or not the possibility of classification in division 1.4 should be provided by the default system, and if yes whether classification under 1.4S should be allowed since classification under 1.4S is normally based on tests.

79. Several experts considered that the default system should not be based only on the size of fireworks, but also on other parameters such as the weight of the pyrotechnic substance contained per item or per package.

80. The Sub-Committee finally agreed that a parallel working group should be held during its next session with the mandate to develop a default classification list with annex 1 of INF.9 as a starting point. All experts should send urgently to the expert of the Netherlands (e-mail: paul.huurdeman@dgg.minvenw.nl) their test results for default classification on the basis of test series 6, and the expert of the Netherlands would prepare an official proposal for the next session of the Sub-Committee on the basis of annex 1 to INF.9 and of this exchange of views.

Classification of ammonium nitrate emulsions, suspensions and gels (ANEs)

Document: ST/SG/AC.10/C.3/38, paras. 82-83 and annexes 1 and 2 (Report of the Sub-Committee on its last session)

Informal document: INF.21 (Japan)

81. Several experts welcome the results obtained by performing tests of series 8(a), 8(b) and 8(c) on some ANEs.

82. The expert from the United States of America said that the document had been submitted late and he had had no time to check these results.

83. The expert from Japan was asked to submit the document to the next session as a formal proposal.

84. The expert from South Africa mentioned that the test 8(c) (Koenen test) performed in her country led to the question of the appropriateness of this test for classifying ANEs.

85. The expert from Norway said that, since there were questions on adopted tests, since test 8(d) remained to be discussed and since the question of transport of ANEs in tanks should also be addressed, a working group on ANEs should be convened during the next session.

86. The expert from the United States of America considered that these issues could be considered during the plenary session, but most experts shared the view of the expert of Norway that, due to the growing use and transport of ANEs, it would be necessary to conclude that work during this biennium and a working group session would be more appropriate to discuss such technical issues.

87. The Sub-Committee decided that a working group of experts on explosives would be held during the first week of the next session to discuss firework default classification (2,5 days) and ANEs (1,5 days).

Type G self-reactive substances

Document: ST/SG/AC.10/C.3/2001/33 (Germany)

88. Several experts did not agree with the German interpretation of Note 1 to paragraph 2.4.3.2.3.1 of the Model Regulations. This Note only meant that type G substances could be classified in division 4.2 if they met division 4.2 criteria, contrary to the other types of self-reactive substances which had to be classified in division 4.1 even when meeting also division 4.2 criteria. This did not imply that type G substances had to be systematically considered as candidates for division 4.2.

89. The expert from Germany said that he would submit a revised proposal.

N.O.S. entries for desensitised explosives and energetic substances

Document: ST/SG/AC.10/C.3/2001/34 (Germany)

90. The Sub-Committee adopted the proposal for N.O.S. entries for desensitised explosives with some modifications (see annex 2).

91. Since there was not much support for the N.O.S. entries for energetic substances, the expert from Germany withdrew the part of the proposal related to such substances.

Rationalized list of currently assigned organic peroxides

Document: ST/SG/AC.10/C.3/2001/47 (ICCA)

Informal document: INF.10/Rev.1 (ICCA)

92. The Sub-Committee adopted the principles of updating and rationalizing the list of organic peroxides, but as informal document INF.10/Rev.1 had been submitted late and as several experts said they had extensive comments on the proposed revised list, the representative of ICCA was requested to prepare a new consolidated document taking account of these comments for the next session.

HARMONIZATION WITH THE INTERNATIONAL ATOMIC ENERGY AGENCY (IAEA) REGULATIONS FOR THE SAFE TRANSPORT OF RADIOACTIVE MATERIAL

Document: ST/SG/AC.10/C.3/2001/57 (IAEA)

Informal documents: INF.29 and INF.30 (IAEA)

93. The Sub-Committee took note of the various draft amendments to the IAEA Regulations adopted so far, and noted that a complete list of corresponding amendments to the Model Regulations would be submitted to the Sub-Committee in July 2002 after formal adoption by the relevant IAEA body at its next session (TRANSSC VII, 4-8 March 2002).

94. The Chairman underlined that it would be appropriate to submit comments, if any, on these draft amendments to the IAEA before their formal adoption by TRANSSC VII. Since there were no comments on the substance of the proposed amendments, the Sub-Committee was invited to consider, before the next session, the suitability of the location of the proposed amendments in the UN Model Regulations, and of their wording.

95. The Sub-Committee noted with satisfaction that other draft amendments, intended to bring more consistency between the IAEA Regulations and the UN Model Regulations, would also be proposed to TRANSSC VII.

96. The representative of IAEA mentioned that further work in this respect was also envisaged by his organization, in particular with regard to terminology and definitions, subsidiary risks and documentation.

97. The expert from the United Kingdom noted that certain documents related to the IAEA Regulations, in particular concerning packaging testing procedures, had not yet been published by IAEA. He said that there were still fundamental differences between the IAEA and the UN methodologies for testing of packagings, the application of marks and the allocation of packing instructions, and that these problems should be addressed in future.

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

Exemption of pharmaceutical products

Document: ST/SG/AC.10/C.3/2001/41 (Switzerland)

Informal document: INF.18 (United Kingdom)

98. Several experts were opposed to the proposal presented by the expert from Switzerland, since as presented it would exempt from the Model Regulations a wide range of dangerous goods other than medicines without any quantity limitation. They felt that there were already suitable provisions in Chapter 3.4 for such products when packaged in limited quantities and distributed for retail sale or for personal or household use.

99. The observer from Switzerland withdrew his proposal and supported the proposal by the United Kingdom in INF.18 for a new entry for retail products in Class 9.

100. Some experts supported also the proposal by the United Kingdom, but had concerns regarding some of the details (e.g. shipping name, quantities per package, etc.). As it had been submitted as an informal document, the expert from the United Kingdom was invited to submit an official proposal for the next session on the basis of comments from other delegations.

Transport of hybrid electric vehicles

Document: ST/SG/AC.10/C.3/2001/53 (United States of America)

101. The proposal was adopted (see annex 2).

GLOBAL HARMONIZATION OF SYSTEMS OF CLASSIFICATION AND LABELLING OF CHEMICALS

Substances hazardous for the environment

Documents: ST/SG/AC.10/C.3/2001/39 (United Kingdom)
ST/SG/AC.10/C.3/2001/15 (Belgium)

Informal document: INF.28/Rev.1 (Belgium)

102. The Sub-Committee welcomed the work the expert from the United Kingdom had done on the preparation of a text for Chapter 2.9 concerning the classification of substances hazardous for the environment on the basis of the texts of the Globally Harmonized System of Classification and Labelling (GHS).

103. The expert from Belgium proposed that the texts should be simplified by presenting them in a more prescriptive form and in a more appropriate logical order in the context of statutory requirements for transport, without modifying the criteria. He said, however, that he had not had the time to complete his proposal in full, particularly as regards the texts concerning mixtures.

104. The majority of delegations considered that, for substantive aspects, the GHS texts should be kept. Several delegations would nevertheless have liked these provisions to be trimmed by deleting all the particulars that were unnecessary in transport regulations and by including references to the GHS where explanations were required.

105. Several experts requested that the question of applying criteria to substances already classified as hazardous should also be discussed, to see whether it would be necessary, as in the IMDG Code, to identify and label all substances meeting those criteria, or whether the present recommendation, according to which it was unnecessary to add a label identifying a pollution hazard to substances already classified as hazardous, should be left. The expert from Germany proposed that a list of the substances in question should be prepared for the next session if the Sub-Committee were already going to take a substantive decision on the matter.

106. The Chairman said that it would be preferable to come back to this question at the next session on the basis of written proposals.

107. The expert from the United Kingdom said that in view of the work already furnished and the small number of written comments which had been transmitted to him, he had no intention of submitting a revised proposal. He would therefore like the proposed text to be put to the vote.

108. The observer from the Bahamas said that it would not be advisable to revise the document with a view to replacing certain sections by references to the GHS, since the GHS document had not been published officially, and until it was, it was preferable to have as full a text as possible. In order that progress on this question should not be further delayed, he hoped that the document would be adopted as it stood.

109. A vote was taken on the United Kingdom 's proposal which was adopted with some corrections of details (see annex 2).

110. Bearing in mind the discussion that had taken place, a member of the secretariat pointed out that the text adopted already contained a large number of references to the GHS document and asked whether they should be deleted and the sentences in question amended.

111. The expert from Belgium considered that several paragraphs were not in keeping with the latest version of the GHS, particularly with reference to mixtures.

112. The Chairman asked the experts to check all the new provisions carefully to ensure that they were in accordance with the GHS. He also invited those experts who wished to amend the provisions to submit written proposals for amendments to the texts adopted.

Hazard communication

Document: ST/SG/AC.10/C.3/2001/44 (United States of America)

113. The expert from the United Sates of America informed the Sub-Committee that his Government had initiated a study that will attempt to assess the concerns raised in relation to the recommended use of a diamond-shaped pictogramme in the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) for all chemical hazard communication

purposes, notably as regards the impact on transport of dangerous goods operations, hazard identification and segregation during transport, transport emergency response and enforcement.

114. Several delegations welcomed this study and expressed interest for the results which would be made available at the next session.

115. Other delegations expressed concern at the fact that this study seemed to be directed at pointing out the possible negative impacts of the GHS pictogramme on the existing transport regulatory systems but would neither address the impact on other regulatory systems nor the benefits of a harmonized multisectoral approach.

116. The Chairman recalled that the Sub-Committee had already decided to support the multisectoral use of the diamond-shaped pictogramme, and that since there was no request to propose a different approach, it could only take note of the initiative of the United States of America.

117. The expert from the United States of America said that he would amend the methodology of his study on the basis of constructive comments from members of both Sub-Committees and would present the results in July.

GHS symbol for serious health effects

Informal document: INF.40 (Sweden)

118. The expert from Sweden informed the Sub-Committee that new pictograms for serious health effects would be proposed to the GHS Sub-Committee at its forthcoming second session (12-14 December 2002).

OTHER BUSINESS

Applications for consultative status

Document: ST/SG/AC.10/C.3/2001/51 (ICCTA)

Informal document: INF.23 (ABSA)

119. The Sub-Committee agreed to provide consultative status to the American Biological Safety Association (ABSA) and to the International Council of Chemical Trade Associations (ICCTA) for participation in its work when matters within the competence of their organization are discussed.

Cooperation with the Intergovernmental Committee for the Cartagena Protocol on Biosafety (ICCP)

120. The Sub-Committee noted the recommendations made by the second meeting of ICCP (Nairobi, Kenya, 1-5 October 2001). Recalling that the transport of some genetically modified organisms was subject to the provisions of the Model Regulations on the Transport of Dangerous Goods, and noting that ICCP had appropriate expertise in this field, the Sub-Committee agreed that cooperation should be established as regards matters concerning handling, packaging,

transport and identification, and that the provisions of the Model Regulations could be amended to accommodate the transport regulatory needs of the Cartagena Protocol on the basis of concrete proposals.

121. The expert from the United States of America said that he was working with other officials in ICCP and was considering amendments to the UN Model Regulations to make them more consistent with regulations of other sectors and the Cartagena Protocol. He also indicated that he would cooperate with the expert from Canada regarding genetically modified microorganisms and the review of Division 6.2.

Safety in tunnels report

Informal document: INF.39 (United Kingdom)

122. The Sub-Committee noted that the Organization for Economic Co-operation and Development (OECD) and the Permanent International Association of Road Congresses (PIARC) had published a report on the "Transport of Dangerous Goods through Road Tunnels", on 16 October 2001. The report can be obtained from OECD or accessed electronically on the OECD website (www.oecd.org).

Programme of work for the July 2002 session

123. The Sub-Committee was informed that, due to the reconfiguration of the Committee, only four meeting days instead of eight in the past would be allocated to the finalization of the biennium cycle work at the December 2002 session. Therefore as many issues as possible would have to be resolved at the next session (1 to 10 July 2002).

124. Three working group meetings will be held in parallel with the plenary session during the first week (transport of gases, fireworks, ammonium nitrate emulsions).

Deadline for submission

125. The deadline for submission of documents for the next session is 5 April 2002. In view of the expected number of documents, delegations were invited to submit their proposals well in advance of the deadline whenever possible.

ADOPTION OF THE REPORT

126. The Sub-Committee adopted the report on its twentieth session and the annexes thereto on the basis of a draft prepared by the secretariat.
