

**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**

**(Twentieth session, 3-12 December 2001,
agenda item 4)**

Transport of certain solids by air

Transmitted by the observer from The Bahamas

1. UN 1910 – Calcium Oxide and UN 2812 – Sodium Aluminate, Solid carry SP 106, ie only dangerous in air transport. It is believed that these substances do not met the UN criteria for Class 8, PG III, but in view of the known aggressive reaction when wet with aluminium they are classified by ICAO on grounds of "human experience".
 2. However, both substances now also carry Packing, IBC and Large Packaging Instructions, when packaging issues should surely be a matter for ICAO ? Today, they are in a tank list.
 3. The current IMDG Code lists UN 2812 as a Class 8, PG III, substance dangerous in sea transport (Amd.t 30, 3rd errata), ie no reference to SP 106, as pointed out by Japan. But the current Code ignores UN 1910, which the 12th UN Model Regulations treat the same as UN 2812.
 4. There is a conflict in the Model Regulations. The question is: should PS 106 or the Packing Instruction numbers be deleted from both substances?
 5. In view of the present inconsistency in the IMDG Code, it is desirable to resolve this conflict at the UN level during this session, so that an adjustment may be submitted to IMO's MS Committee for May 2002.
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