

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

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Item 7 of the provisional agenda

Comments on ST/SG/AC.10/C.3/2004/36 – Documentation Requirements

Transmitted by the expert from the United States of America

1. The expert from the United States of America has reviewed the amendments proposed by FIATA in ST/SG/AC.10/C.3/2004/36, and does not agree that they are necessary or appropriate. FIATA proposes to allow UN package codes as an alternative to listing the generic package type (drum, box, jerrican, etc.) on the transport document as required by 5.4.1.5.1. The requirement in 5.4.1.5.1 does not authorize the use of packaging codes currently. The primary concern with the FIATA proposal is that package codes are not readily understood by all people in the transport chain, or by emergency response personnel. When incidents occur during transport, emergency responders need to know the number and types of packages present. For example, emergency responders at the scene of an incident would use the information to be certain that they have accounted for all of the packages and taken appropriate hazard remediation measures. After a release of hazardous materials from a motor vehicle involved in a highway traffic accident, it is important for the emergency responders to quickly ascertain the number and types of packages when determining their emergency response actions. While it is beneficial to a responder to know that there are “50 drums” of a material loaded on a truck, “50 1A1” may be meaningless. Another concern is that it can be confusing if the numerical packaging code follows the number of packagings (e.g. 11 11A).

Proposal

2. It is proposed that the UN text in 5.4.1.5.1 either be left unchanged or, if the Sub-Committee believes it to be necessary, that the text be clarified to indicate that package codes are allowed as additional information as shown below:

If the second option is preferred amend 5.4.1.5.1 to read as follows:

"5.4.1.5.1 Total quantity of dangerous goods

Except for empty uncleaned packagings, the total quantity of dangerous goods covered by the description (by volume or mass as appropriate) of each item of dangerous goods bearing a different proper shipping name, UN number or packing group shall be included. For Class 1 dangerous goods, the quantity shall be the net explosive mass. For dangerous goods transported in salvage packagings, an estimate of the quantity of dangerous goods shall be given. The number and kind (e.g. drum, box, etc.) of packagings shall also be indicated. **UN packaging codes may be used to supplement the description of the type of package.** Abbreviations may be used to specify the unit of measurement for the total quantity.
