

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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DANGEROUS GOODS PACKED IN LIMITED QUANTITIES

Comments on ST/SG/AC.10/C.3/2004/44

Transmitted by the International Air Transport Association (IATA)

Introduction

The International Air Transport Association would like to comment on the specific proposals contained in document ST/SG/AC.10/C.3/2004/44 produced by the Experts from Canada and France and also to offer some general comments on some of the basic principles with regard to “Limited Quantities”.

Specific Comments

The proposals contained in the document may appear attractive from a ‘harmonized’ approach for multi-modal transport, but they do not meet the needs of the air transport industry. The specific concerns of the air transport industry on the proposals are:

1. **Classification.** The original request to the UN by ICAO was for the allocation of a UN number, UN 8000, for ‘Consumer commodities’. Consumer commodities under the ICAO provisions are restricted to aerosols in Division 2.1 and Division 2.2, Class 3 (Packing Group II or III), Division 6.1 (Packing Group III only) and UN 3175. In addition, such substances must not have a subsidiary risk. The proposals contained in the document extend the air mode concept of consumer commodities significantly to any substance currently permitted under the Limited Quantities provisions of Chapter 3.4.
2. **Packaging.** The ICAO packaging requirements for Limited Quantities require outer packagings that while not UN Specification must still meet a defined standard. The proposals in the document would permit packaging of a lesser standard than currently applies for air transport.
3. **Marking and Labelling.** The air mode provisions provide no relaxation for Limited Quantities or Consumer commodities from the marking and labelling requirements applicable to dangerous goods, except that when shipped as “Consumer commodities” they are classified in Class 9 and segregated on board an aircraft accordingly. For air transport, hazard labels on all packages containing dangerous goods, including those under the limited quantity and consumer commodity provisions form an essential part of risk communication for all persons involved in the transport chain. For persons in the warehouse and on the ramp, hazard labels are the only method by which dangerous goods can be clearly identified and appropriate segregation / separation applied.

4. **Documentation.** As with marking and labelling, for air transport, Limited Quantities / Consumer commodities must comply with all of the provisions of the ICAO Technical Instructions for the dangerous goods transport document. The air mode requires that operators must use an acceptance checklist for dangerous goods consignments. The dangerous goods transport document and the information provided on it by the shipper forms an essential component of that acceptance check.

In addition, the information provided on the dangerous goods transport document is essential for provision of the required information for the notification to pilot-in-command. Removal of this information would compromise the ability of operators to confirm that the consignment complies with all of the regulatory requirements. The impact of this is a potential reduction in the level of safety for air transport.

Basic Principles

The original request from ICAO to the Sub-Committee was for a UN number to be allocated to “Consumer commodities” as UN 8000. As identified above, in the ICAO Technical Instructions, consumer commodities are a very limited group of dangerous goods that, provided that they are packed in accordance with ICAO Packing Instruction 910, may be treated as Class 9. These substances are still subject to all of the marking, labelling and documentation requirements of the ICAO Technical Instructions.

Following this request, a much wider discussion evolved that brought in the whole concept of Limited Quantities and Excepted Quantities from ICAO to see how this could be harmonized with the UN concept of Limited Quantities. The result being the proposals contained in document ST/SG/AC.10/C.3/2004/44.

IATA believes that the issues should be separated and that the original request from ICAO for UN 8000 should be revisited and the various request considered in isolation. The potential for a single harmonized standard for Limited Quantities should still continue, but also should include adopting into the UN Model Regulations the air mode provisions for Dangerous Goods in Excepted Quantities. It is understood that the classification criteria for the air mode provisions for Dangerous Goods in Excepted Quantities may need to be streamlined in order not to be less restrictive than limited quantities.
