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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

(Twenty-fifth session, 5-14 July 2004,
agenda item 5)

DANGEROUS GOODS PACKED IN LIMITED QUANTITIES

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

Transmitted by:

The International Association of Soap, Detergent and Maintenance Products (AISE),

The Consumer Specialty Products Association (CSPA),

The European Aerosol Federation (FEA),

The International Federation of Freight Forwarders Associations (FIATA),

The International Express Carriers Conference (IECC)

1. The industries represented by the organisations listed above have an essential interest in the transport of dangerous goods in Limited Quantities. They comprise both consignors of goods in limited quantities and those who are responsible for carrying them. Harmonised Limited Quantities provisions is a key issue for industry.
2. They recognise and appreciate the hard work and effort which all the members of the working group have made. They also recognise the large scale of the work undertaken and the fact that this cannot be accomplished in one biennium. It is not their intention to delay any decisions.
3. However, whilst they welcome some of the proposals made, the options presented in ST/SG/AC.10/C.3/2004/44 do not yet address all the needs of industry. Those needs remain, as the world is changing: international movements of goods are increasing rapidly. Intermodal movements of goods are now the norm and the complications of unharmonised Limited Quantities provisions lead to high costs and the potential for poor compliance, which can then impact on safety.
4. In their view the working group cannot be expected to complete the mammoth task it set itself in just one biennium. This issue has been raised several times in the past and it would be a great shame if the work were now stopped because it must extend beyond a single biennium.

Proposal

5. To implement the concept of Excepted Quantities into the UN Model Regulations and to make it available for all transport modes.
6. That the UN sub committee agrees that the working group, comprising regulators, consignors and carriers, should continue its work into the next biennium.
7. Because of the enormity of the task it is proposed to continue it on a simpler basis, allowing realistic expectations and a collaborative approach between regulators at UN and modal level, consignors and carriers. Such is industry's commitment to completing this important task, it is willing to provide a joint chairman to help progress the work in the next biennium. The work could be tackled in steps. For example:
8. Proposed Steps:
 - Collect the different existing modal and regional regulations for Limited Quantities (e.g. IMDG vs. ADR vs. ICAO vs. CFR49 vs. Australian Dangerous Goods Code vs. others (Japan, China, etc.) with a translation if necessary;
 - Analyse the difference between them against the existing UN Model Regulations;
 - Examine the reasons for each difference objectively;
 - Collect the new or additional needs from both regulators and industry;
 - Assess the implication for regulators/regulations/industry;
 - If possible quantify possible impacts;
 - Try to get a common position or clear options to vote on;
 - Agree on one possible level across all modes/regions;
 - Where differences are essential, agree exceptions for regions and/or mode.
9. If the UN sub committee agrees that this type of approach is attractive, then a more detailed proposal and work plan, written jointly by regulators and industry, could be submitted for approval in December.
