

UN/SCETDG/26/INF.42

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-sixth session
Geneva, 29 November-7 December 2004
Item 3 (a) of the provisional agenda

OUTSTANDING ISSUES OR PROPOSALS OF AMENDMENTS TO THE RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Comments on ST/SG/AC.10/C.3/2004/85 (EIGA) and UN/SCETDG/26/INF.27 (USA)

Transmitted by the expert from Belgium

Introduction

1. The Expert of Belgium agrees with the intent of the EIGA proposal ST/SG/AC.10/C.3/2004/85.
2. The point of view of the United States of America, given in UN/SCETDG/26/INF.27, that exceptions should not take the form of a note and that the amendment would create confusion with respect to the refrigerated liquefied gases, is also valid.
3. The proposals of the United States of America however will create new problems. With their 2.2.2.1 (b), it is impossible for a dissolved or a refrigerated liquefied gas to be non-flammable, non-toxic ! Moreover, a definition is not the appropriate place to address the field of application of the Model Regulations.

Proposals

1. Redraft the first sentence of 2.2.2.1.(b) as proposed by EIGA (eliminate the words “are transported at a pressure not less than 280 kPa at 20 °C, or as refrigerated liquids, and which”.
 2. Introduce a new 2.2.2.3, as follows :
“2.2.2.3 Gases of Division 2.2, other than refrigerated liquefied gases, are not subject to these Regulations if they are transported at a pressure less than 280 kPa at 20 °C.”
-