

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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OTHER BUSINESS

Comment to the proposals transmitted by the International Dangerous Goods and Containers Association (IDGCA) in ST/SG/AC.10/C.3/2006/55

Submitted by the expert from Germany

Undoubtedly, there are some problems related to the recommended methods for SADT determination as described in Section 28 of the Manual of Tests and Criteria, particularly with regard to solid substances. Reasons for that are the necessary adaptations of the state of the art as well as long experience in using the methods.

In the opinion of the expert from Germany the proposed modifications and updates are suitable to only a limited extent. Therefore the proposals of IDGCA as presented in the above-mentioned document should not be adopted at this stage. The problem of the correct determination of the SADT for substances as packed for transport is very complex and needs further consideration on basis of experience of the all the experts involved and interested in this matter. Germany appreciates a discussion and proposes to install an informal working group to prepare a coordinated proposal for a revision of Section 28 of the Manual of Tests and Criteria.

The working group could take the document ST/SG/AC.10/C.3/2006/55 as one basis for further discussions and take into consideration the following exemplary comments:

- Any experimental evidence for the results the authors present in the annex is missing.
- The proposed SADT definitions should be carefully reviewed.
- The usefulness of a kinetic-based simulation method depends strongly on the quality of the available or measured data. The work to determine exact data is very extensive and needs a lot of expert knowledge.
- The assertion that the UN tests H.2 and H.3 are principally inapplicable for solid products corresponds not with long experiences.
- Currently, the usefulness of the UN test H.4 also for solid self-reactive substances is discussed in the scientific literature.

If the Sub-Committee of Experts decides to establish an informal working group, the expert of Germany is prepared to host and organise the meeting.
