
**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-ninth session

Geneva, 3-12 (a.m.) July 2006

Item 5 of the provisional agenda

LIMITED QUANTITIES

Excepted Quantities

Comments on ST/SG/AC.10/C.3/2006/45

Submitted by the International Vessel Operators Hazardous Materials Association, Inc. (VOHMA)

1. VOHMA wishes to thank the expert from the United Kingdom for undertaking the task of synopsisizing the recommendations put forth by the participants in the working group meetings as well as the plenary session of the December 2005 session. During the lunchtime working group meetings, numerous suggestions and proposals were presented and copious edits followed, presenting a daunting task in assembling this work into a viable proposal now presented in this session for consideration by this sub-committee as ST/SG/AC.10/C.3/2006/45.
2. VOHMA would like to take this opportunity to provide additional information for consideration by this sub-committee based on discussions during the working group meetings, discussions with other industry representatives, and conclusions drawn by VOHMA members at our membership meetings. While we would agree that very little danger may be presented by a dozen or so packages transported in mixed break-bulk cargo on an aircraft, we feel that the same may not be true if thousands of these packages of excepted quantity dangerous goods are packed as a container-load or even several container-loads transported on a cellular container-ship. Modal harmonization would be enhanced by applying limits in the Model Regulations applicable to all modes.
3. The proposed section 3.5.1.6 would require the name of the consignor or the consignee to be entered on the transport unit marking, as illustrated at Figure 3.5.1. In the case of multiple consignments within a consolidation this requirement would be burdensome. We suggest that the information required to be entered on the IATA excepted quantities label at 2.7.6, including the hazard classes and UN numbers of the contents would be of greater value. Of greater concern, is the exception to displaying the marking. During the working group meetings it was suggested that the marking be required for a cargo transport unit transporting any quantity of consignments identified as excepted quantity and that the threshold limit would apply to the authorized gross mass which could be offered as an excepted quantity. If the consignment exceeded the authorized mass, a shipper's declaration for dangerous goods would be required since it would no longer qualify as an excepted quantity.

4. In regard to proposed 3.5.1.7 no documentation is required, except in the maritime mode when the transport unit carries 1000 packages or more of dangerous goods in excepted quantities, in which case a container packing certificate is to be provided. VOHMA would like to remind the sub-committee that the container packing certificate at 5.4.2 certifies that the packing of the cargo transport unit has been carried out in accordance with the paragraphs (a) through (i) all of which deal with the condition of the cargo transport unit, the inspection of packages loaded therein, the proper segregation of incompatible dangerous goods, the marking, labeling and placarding of packages and containers, and states that a dangerous goods transport document, as indicated at 5.4.1.1 has been received for each dangerous goods consignment loaded in the container/vehicle. Since it is proposed that no transport document be required, the criteria for a CPC would not be met, therefore the proposal to include only 5.4.2.1 paragraphs (a) to (h). No information related to the identification of the dangerous goods, the classification, or other information that might be vital in the event of an incident at sea is entered upon the container packing certificate. For example, incidents involving fire occurring within containerized cargo, stowed in thousands of containers on board a vessel, can readily spread to adjacent containers and responding crew-members must be able to quickly assess the personal protection equipment (PPE) needed to safely respond. Some form of a descriptive document for these consignments is necessary if they are to be transported in significant cumulative quantities.
5. Suggestions made during the working group sessions indicated an interest in setting a threshold limit that would apply to the authorization to ship a consignment as an excepted quantity. Recommendations ranged from 500 kg to 1000 kg or to the use of the number of packages to establish such threshold. Since the submission now under consideration proposes that no dangerous goods documentation be required, VOHMA recommends that the sub-committee consider a weight limit as the threshold since all cargo, by any mode of transport, whether regulated as dangerous or not, is accompanied by some form of a bill-of-lading or other commercial document which is used to establish the tariff on a weight rated basis. We suggest a threshold of 500 kg, since it has been stated that these excepted quantity consignments are seldom shipped in larger lots. A carrier could readily determine if the weight of the consignment were within the authorized threshold limit.
6. VOHMA proposes that the proposed text at ST/SG/AC.10/C.3/2006/45 be amended as follows:

3.5.1.6 Marking of transport units

Transport unit containing dangerous goods in only excepted quantities need not be placarded. They shall however be marked with the mark shown in Figure 3.5.1 with a minimum dimension of 250 mm x 250 mm, on both sides and both ends of the transport unit in accordance with 5.3.1.1.4.

3.5.1.7 Documentation

Where a transport unit contains 500 kg or less of dangerous goods in excepted quantities and will be transported by sea, they shall be described on a bill of lading or any other document as "Dangerous goods in excepted quantities". Consignments of excepted quantities greater than 500 kg in one transport unit are subject to the full documentation requirements of Chapter 5.4, including 5.4.1.5.X."

5.4.1.5.X *Excepted quantities (to be added)*

When dangerous goods are transported according to the exceptions for dangerous goods packed in excepted quantities provided for in Column 7 of the Dangerous Goods List and Chapter 3.5, the words “Excepted quantity” shall be included.

Table X.1.1 Excepted Quantities

Class 6.1, Packing Group I, authorization is proposed in accordance with the code E5 corresponding to the thresholds at 3.5.1.2. VOHMA proposes that an additional note be added under the Table X.1.1 as *(f) Toxic substances in Class 6.1, PG I, presenting inhalation toxicity are not authorized to be offered under the provisions of this Chapter*. The superscript *(f)* should be entered on class 6.1 in the Class/Division column of the table. The ICAO TI at 2.4.2.2 excludes 6.1 substances having an inhalation toxicity of packing group I.

7. VOHMA suggests to this subcommittee that consideration of our concerns would not prohibit the shipping of dangerous goods or substances in greater quantities than the excepted quantity threshold limits as suggested, but would merely make those consignments subject to the documentation requirements of Chapter 5.4. Alternatively, the provisions of Chapter 3.4 for offering the consignments as limited quantities could be used, subject to the documentation and marking requirements therein.
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