

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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LIMITED QUANTITIES (MULTIMODAL HARMONIZATION)

Comments on ST/SG/AC.10/C.3/2007/26

Package marking

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

1. VOHMA agrees with many of the introductory statements included in the submission by AHS regarding the need for international multi-modal harmonization in the regulations that apply to dangerous goods authorized to be offered and transported according to the authorizations for exceptions as a “limited quantity”. We concur that a universally acceptable marking that is suitable for use in all modes of transport in all jurisdictions should be displayed on packages containing limited quantities of dangerous goods. We also agree that past efforts undertaken during the previous biennium may not have succeeded because the subject may have been addressed in very broad proposals.
2. While we appreciate the AHS goal of achieving harmonization, VOHMA believes that the proposal at ST/SG/AC.10/C.3/2007/26 is once again an unnecessarily broad proposal which proposes assigning a UN identification number based, not on the hazards but on the end use of the material.
3. Chapter 2.0 of the Model Regulations applicable to classification includes at 2.0.1.1, definitions “Substances (including mixtures and solutions) and articles subject to these Regulations are assigned to one of the nine hazard classes according to the hazard of the most predominant of the hazards they present.” At 2.0.2.1 “Dangerous goods are assigned to UN numbers and proper shipping names according to their hazard classification and their composition.” The proposal by AHS to revise 3.4.9 would assign a unique UN number to all dangerous goods in limited quantities intended for consumer use without consideration of the hazard class or proper shipping name as currently required by Chapter 2.0 of the Model Regulations.

4. VOHMA does not support introducing the assignment of a UN identification number based on final use of the dangerous goods. The UN identification number is used by handlers, carriers, stowage and segregation personnel, as well as emergency responders to identify the specific hazards and response methods that should be used in the event of a fire or release. To assign a UN identification number, common to all dangerous goods intended for consumer use, would not only be inconsistent with the principles of 2.0.2.1, the number would be of no value in identifying the hazards of the package contents.
 5. VOHMA suggests that the current marking requirements of the ADR at 3.4.4 (c) whereby the UN identification number, or in the case of multiple dangerous goods in limited quantities in the same package, either multiple identification numbers or the letters “LQ” be displayed within the diamond shaped marking, would be a less burdensome and more beneficial method of marking the package. The design of the symbol or marking is inconsequential as long as it is acceptable to all modes of transport in all geographies.
 6. In the ocean container-ship mode of transport, thousands of TEUs are loaded aboard the vessel for transport on the high seas. Often, dangerous goods in limited quantities, including those intended for consumer use, are packed in container-load lots, not visible within the sealed freight container. The hazards presented by limited quantities intended for consumer use are no different than those presented by limited quantities for laboratory or industrial use, and we see no benefit in providing additional relaxation of the regulations based on end-use of the goods.
 7. We also do not support the proposal which provides “Consumer products do not require a dangerous goods transport document”. All consignments are accompanied by some type of commercial document such as a waybill or bill of lading and propose that the text at 3.4.7 be retained for all limited quantities “In addition to the provisions for documentation specified in 5.4.1, the words “limited quantity” or “LTD QTY” shall be included with the description of the consignment.”
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