

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 paper ST/SG/AC.10/C.3/2007/26

Transmitted by The Council on Safe Transportation of Hazardous Articles (COSTHA)

In paper ST/SG/AC.10/C.3/2007/26 the Association of Hazmat Shippers (AHS) proposes to add a new UN number for consumer products and to allow packages containing a Consumer Product to be marked with the UN number within a diamond. The primary basis for this proposal is an attempt to harmonize the package marking requirements for dangerous goods commodities that are manufactured for retail sale or distribution for household or personnel use. COSTHA recognizes the concerns raised by AHS and appreciate the opportunity to express our comments.

Comments

COSTHA members represent approximately \$2 trillion in commerce. Many of the products shipped by our members can be identified as consumer commodities and these products are an important commodity in the global marketplace. Consumer type dangerous goods are usually packaged in relatively small quantities and present minimal risk during transport. However, due to the nature of the supply chain and the vast quantity of shipments, we support the development of a more comprehensive strategy to identify such products and enhance safety without adopting unnecessary, overly-restrictive, controls in transport. In the global marketplace new releases of consumer product can be simultaneously distributed to thousands of retail locations reaching all markets in less than a week.

Before we concern ourselves with package marking of these products we must resolve the fundamental issue of determining the primary classification to these products and to determine if they are viable reasons to exempt these products from the regulations.

Various National and Modal regulations classify these products differently. Examples are:

In the United States of America (Title 49 CFR) consumer products are identified as Consumer Commodity, ORM-D.

The International Air Transport Association (IATA) and the International Civil Aviation Organization (ICAO) classifies these products as ID 8000, using the proper shipping name Consumer Commodity, and assigning them to Class 9. The quantities and hazard classes eligible for these provisions are more restrictive than the other modes.

The International Maritime Dangerous Goods Code (IMDG Code) classifies these products in accordance their assigned UN hazard class as authorized in accordance with the Limited Quantity provisions set forth in Chapter 3.4, and provides packaging marking exemptions when these limited quantities are intended for retail sale for consumer use.

ADR Special Provision 601 specifically states that pharmaceutical products that are ready for use, which are substances manufactured and packaged for retail sale or distribution for personal or household consumption are not subject to the requirements of ADR.

COSTHA supports the introduction in the Model Regulations of a package marking that would be authorized for use in all modes of transportation throughout the world. We do not believe that assigning a new UN identification number to all consumer products will provide adequate information to emergency responders and thus will not have a positive effect on safety.

COSTHA believes that this Sub Committee should address the issue of consumer commodity classification first before making any recommendations as to marking and labeling of consumer commodity packages. Further we would like to suggest the Sub Committee establish a Working Group to review the issue and make recommendations as appropriate. COSTHA would be pleased to participate in the Working Group.
