

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
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MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Fumigated cargo transport units and cargo transport units containing dangerous goods for cooling or conditioning

Comments to document ST/SG/AC.10/C.3/2008/9

Transmitted by the expert from Sweden

Introduction

Sweden supports the proposal from the United Kingdom concerning new regulations for fumigated cargo units and those cargo transport units containing dangerous goods for cooling or conditioning. However, we have a few comments and would like to suggest some amendments to the proposal (new or revised text in bold).

Proposals

1. We believe the word order in 5.5.1.3.4 (second entry) could be reversed to make the text more straightforward. We propose the following:

“5.5.1.3.4 The application of a Class 9 placard is not required on cargo transport units under fumigation. “

2. We would like to suggest amendments in the training requirements in sub-section 5.5.1.2 to reflect similar amendments which have been made in recent meetings. We think the proposed text in 5.5.1.2 should include “shall be trained” instead of “shall receive”. However, there are many requirements in Sections 5.5.1 and 5.5.2 that would be difficult to comply with, without appropriate dangerous goods training. In 5.5.1.2 it is not clear what kind of training is required and we believe it would be more appropriate to make references to Chapter 1.3. We suggest that 5.5.1.2 be deleted and that 5.5.1.1.1 be amended to read:

*“5.5.1.1.1 Fumigated cargo transport units (UN 3359) containing no other dangerous goods and meeting the marking and documentation provisions of 5.5.1.3 and 5.5.1.4 are not subject to any provisions of these Regulations other than those of this section, **and the training requirements in Chapter 1.3.**”*

This wording is used in the beginning of Chapter 3.5 and would not change the intent of the requirement in 5.5.1.2 in document 2008/9.

3. Due to the detailed requirements in Section 5.5.2, it may be wise to insert a similar provision in 5.5.2.1.1 as follows:

*“5.5.2.1.1 The transport of dangerous goods used for cooling or conditioning purposes meeting the marking, placarding and documentation provisions of 5.5.2 are not subject to any provisions of these Regulations other than those of this **section and the training requirements in Chapter 1.3**, and ~~except for~~ the applicable requirement in the packing instructions of Part 4 where the dangerous goods used as refrigerant are mentioned (e.g.: P620, P650 or P904) [pending also the proposal on closed cryogenic receptacles].”*

4. Since the UN number is required in the transport document, it seems more appropriate to mark the fumigated cargo transport unit accordingly. It seems fitting to require the UN number in both places and it would be possible to have the UN number 3359 on the fumigation mark. This would clarify the situation for the enforcement bodies and transport workers. When they find a UN number in a transport document they will look for a mark on the unit. We propose the following:

“5.5.1.3.2 The fumigation warning mark shall be rectangular and shall not be less than 300 mm wide and 250 mm high. The markings shall be in black print on a white background with lettering not less than 25 mm high.

The warning mark shall include:

- (a) The word “WARNING”; and**
- (b) “UN 3359, fumigated cargo transport unit”**

An illustration of this mark is given in Figure 5.5.1.”

5. Finally, we question if it is necessary to mention the hazard class in the transport document when the corresponding placard is not required on the unit. We propose to delete “, 9” and “, class 9” in 5.5.1.4.2.1 as follows:

“5.5.1.4.2.1 Transport documents associated with the transport of cargo transport units that have been fumigated shall include the following information:

UN 3359, fumigated cargo transport unit, ~~9~~

or

UN 3359, fumigated cargo transport unit, ~~class 9~~

6. For the same reason mentioned in paragraph 5, we think bullet point (c) in 5.5.2.3.2.1 should be deleted:

“5.5.2.3.2.1 If a transport document accompanies the dangerous goods used as a coolant or controlled atmosphere it shall include the following information:

(a) The UN number preceded by the letters “UN”;

(b) The proper shipping name;

~~*(c) The primary hazard class or, when assigned, the division of the goods. The words “class” or “division” may be included preceding the primary hazard class or division numbers.”*~~
