

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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Item 5 of the provisional agenda

LIMITED QUANTITIES (MULTI-MODAL HARMONIZATION)

Provisions applicable to limited quantities

Transmitted by the International Civil Aviation Organization (ICAO)

Introduction

1. The ICAO Dangerous Goods Panel (DGP), Meeting of the Working Group of the Whole took place in The Hague 4 – 8 November 2008. This meeting was the first meeting of the new ICAO biennium.
2. As part of the agenda for this meeting the ICAO DGP-WG considered the work by the United Nations Sub-Committee on the subject of dangerous goods in limited quantities and the implications on the provisions of the ICAO Technical Instructions with respect to air mode “limited quantities” as agreed at the 33rd Session of the Sub-Committee (ST/SG/AC.10/C.3/66, para 77).
3. In considering the changes agreed by the Sub-Committee to Chapter 3.4 of the Model Regulations the DGP-WG:
 - (a) Considered removing the term “limited quantities” from the Technical Instructions when referring to the transport of reduced quantities of dangerous goods in non-UN specification packagings;
 - (b) Reviewed the application of the new UN limited quantity provisions on the air mode;
 - (c) Considered how the air mode “limited quantity” provisions could be aligned or harmonised with the new UN limited quantity provisions; and
 - (d) Considered what should be proposed to the UN Subcommittee to facilitate the recognition of dangerous goods prepared in accordance with the air mode “limited quantity” provisions, when transported on the surface modes.

4. On the first point, the DGP-WG agreed that air mode “limited quantity” was not the same as limited quantities in the UN Model Regulations and the use of the same term for what are really different conditions and requirements was adding to the confusion within the shipping community. The DGP-WG therefore agreed to reconsider the use of the term “limited quantity” within the Technical Instructions and will work toward the development of an alternative term through the course of this biennium.

5. In determining that air mode “limited quantities” was different to that in the surface modes, the ICAO DGP-WG considered the requirements for limited quantities in air transport. The DGP considered the removal of hazard labels in air transport for limited quantities but decided that this would not be consistent with the safety requirements for air transport for the following reasons:

- (a) In air transport significant quantities of dangerous goods, particularly those packed in limited quantities are transported on aircraft that also carry regular fare-paying passengers. This is unlike the surface modes where for the most part dangerous goods are carried on transport conveyances where the only persons on board the conveyance is the driver or other members of the operating crew.
- (b) For air transport the hazard labels are used to determine the segregation requirements for dangerous goods and for segregating some dangerous goods from other cargo. For example dangerous goods in Division 6.1 must be segregated from foodstuffs.

6. For these reasons the DGP-WG did not support the removal of the marking of the UN number/proper shipping name and the placement of hazard labels on the outside of packages containing dangerous goods packed in limited quantities according to the Technical Instructions.

7. The DGP-WG then considered what alignment was possible to adopt the UN limited quantity provisions. Here in looking to remove the term “limited quantity” from the Technical Instructions the DGP-WG considered adoption of a new marking such as the use of the “Y” packing instruction number on the basis that in the Technical Instructions the packing instructions for dangerous goods in limited quantities are identified with the prefix “Y”.

8. After some discussion the DGP-WG proposed that in lieu of the current marking “limited quantity” or “LTD QTY”, that packages prepared in accordance with the “Y” packing instructions in the Technical Instructions be marked with the new UN limited quantity marking with the letter “Y” in capital letters placed inside the marking.

9. The DGP-WG believed that the use of the UN limited quantity marking in this manner would facilitate training on the identification of the new limited quantity marking for all modes of transport. The placement of the letter “Y” would provide clear indication to personnel in the surface modes that although the package would still bear a hazard label(s), the “Y” marking would serve to identify that the packages and their contents comply with the provisions of both Chapter 3.4 of the Model Regulations as well as the ICAO TI and would therefore be acceptable for transport as limited quantities in road, rail, air and sea.

10. The final matter that the DGP-WG considered was the size of the limited quantity marking and that of the new “Y” air mode marking. Here the DGP-WG were of the opinion that the limited quantity marking should be 100 mm x 100 mm, unless the surfaces of the package(s) were of such a size that they can only bear smaller marks, in which case the size of the marking may be reduced, but to no less than 50 mm x 50 mm.

11. The DGP-WG believes that it is important that a minimum size of 50 mm x 50 mm for the limited quantity mark be maintained to ensure that packages of limited quantities not prepared in accordance with the air mode requirements could be identified as easily as possible should they enter the air transport stream.

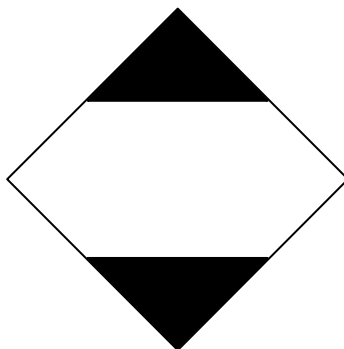
Proposal

12. The Sub-Committee is invited to consider the following amendments to Chapter 3.4. The text is based on the amendments agreed by the Sub-Committee as shown in ST/SG/AC.10/C.3/2008/97:

“3.4.6 Except for air transport, packages of dangerous goods transported according to this Chapter need not be labelled. Any segregation provisions for dangerous goods need not apply within a vehicle or freight container.

3.4.8 Packages containing dangerous goods in limited quantities need not be marked with the proper shipping name or UN number of the contents, but shall bear the marking shown in Figure 3.4.1 below. The marking shall be readily visible, legible and able to withstand open weather exposure without a substantial reduction in effectiveness. ~~Additional information as required by the ICAO's Technical Instructions for the Safe Transport of Dangerous Goods by Air may appear in the centre portion of the marking provided that the package conforms to the requirements of the ICAO's Technical Instructions.~~

Figure 3.4.1



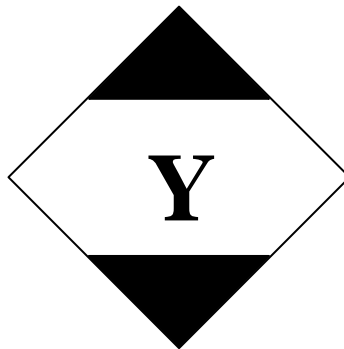
Marking for packages containing limited quantities

Top and bottom portions and line shall be black, centre area white or suitable contrasting background. Minimum dimensions: 100 mm x 100 mm. Minimum width of line forming diamond: 2 mm.

[If the size of the package so requires, the dimension may be reduced, to be not less than 50 mm x 50 mm provided the marking remains clearly visible.]

3.4.9 Packages containing dangerous goods consigned for air transport in conformity with the provisions of Part 3, Chapter 4 of the ICAO Technical Instructions shall bear the marking shown in Figure 3.4.2 below. The marking shall be readily visible, legible and able to withstand open weather exposure without a substantial reduction in effectiveness.

Figure 3.4.2



Marking for packages containing air transport limited quantities

Top and bottom portions and line shall be black, centre area white or suitable contrasting background. The letter “Y” in capital letters with a height of [25 mm] and a width of 5 mm (for a mark measuring 100 mm x 100 mm) shall be placed in the centre of the mark . Minimum dimensions: 100 mm x 100 mm. Minimum width of line forming diamond: 2 mm.

[If the size of the package so requires, the dimension may be reduced, to be not less than 50 mm x 50 mm provided the marking remains clearly visible.]

3.4.10 Packages containing dangerous goods bearing the marking shown in Figure 3.4.2 shall be deemed to meet the provisions of paragraphs 3.4.1 to 3.4.5 of this Chapter.

3.4.911 ~~Except for air transport~~ the documentation provisions of 5.4.1 need not apply to dangerous goods packed in limited quantities. ~~However, mode-specific requirements for documentation for dangerous goods packed in limited quantities may be applicable for sea and air transport and in these cases, the words “limited quantity” or “LTD QTY” [may] be included after the description of the dangerous goods packed in limited quantities (see 5.4.1.5.2).~~

3.4.1012 ~~Except for air transport, when~~ packages are placed in an overpack, the overpack shall be marked with the word "OVERPACK" and the marking required by 3.4.8 ~~for each item of dangerous goods contained in the overpack~~ unless the markings representative of all dangerous goods in the overpack are visible. The overpack need not be marked with the proper shipping name nor labelled.

3.4.13 For air transport the marking and labelling of overpacks shall comply with the requirements of Part 5 of the ICAO Technical Instructions.
