

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 3 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Classification of Pesticides

Transmitted by the expert from Germany

1. Chapter 2.6 of the UN Model Regulations – Toxic and Infectious Substances – contains sub-section 2.6.2.4 “Classification of pesticides”. In our understanding, this sub-section is included to cover those aspects of the classification of pesticides, which a) are not sufficiently covered by or b) differ from the general rules for the classification of toxic substances laid out in section 2.6.2.
2. Paragraph 2.6.4.1 specifies that “All active pesticide substances and their preparations for which the LC₅₀ and/or LD₅₀ values are known and which are classified in Division 6.1 shall be classified under appropriate packing groups in accordance with the criteria given in 2.6.2.2. Substances and preparations which are characterized by subsidiary risks shall be classified according to the precedence of hazard table in Chapter 2.0 with the assignment of appropriate packing groups.”
3. In the course of the classification of certain pesticides with both Division 6.1 and Class 8 properties we found that the second sentence of paragraph 2.6.2.4 could be interpreted in two different ways:
 - (a) Pesticides, which are classified in Division 6.1 and which are characterized by subsidiary risks are treated in the same way as any other dangerous goods: The precedence of hazards table is applied to determine the appropriate class (division) and packing group. For example: A pesticide with properties according to Division 6.1 PG III and Class 8 PG II shall be classified as Class 8 PG II, subsidiary risk 6.1.
 - (b) Pesticides, which are classified in Division 6.1 and which are characterized by subsidiary risks are always classified in Division 6.1. The precedence of hazards table is only used to determine the appropriate packing group according to the subsidiary risk. For example: A pesticide with properties according to Division 6.1 PG III and Class 8 PG II shall be classified as Division 6.1 PG II, subsidiary risk 8.

4. The Sub-Committee is invited to determine the intended meaning of paragraph 2.6.2.4 along the lines outlined above and to clarify the text accordingly by adoption of one of the following proposed amendments.

5. Proposal: amend paragraph 2.6.2.4 in one of the following ways:

- (a) “All active pesticide substances and their preparations for which the LC₅₀ and/or LD₅₀ values are known and which are classified in Division 6.1 shall be classified under appropriate packing groups in accordance with the criteria given in 2.6.2.2. Substances and preparations which are characterized by subsidiary risks shall be classified according to the precedence of hazard table in Chapter 2.0 with the assignment of appropriate classes and packing groups as is the rule for all other dangerous goods.”
- (b) “All active pesticide substances and their preparations for which the LC₅₀ and/or LD₅₀ values are known and which are classified in Division 6.1 shall be classified under appropriate packing groups in accordance with the criteria given in 2.6.2.2. Substances and preparations which are characterized by subsidiary risks shall always be classified in Division 6.1. The subsidiary risk shall only be considered for the assignment of the appropriate packing group according to the precedence of hazard table in Chapter 2.0 ~~with the assignment of appropriate packing groups.~~”
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