

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

Comments on ST/SG/AC.10/C.3/2010/14 (UK) Fuels in machinery and equipment

Transmitted by the expert from Sweden

1. Sweden appreciates this proposal concerning fuel in machinery and equipment.
2. However, we believe that there might be a need for a consequential amendment in SP 301. We propose to amend the last sentence in paragraph 2 as follows (new text underlined):

"The transport of dangerous goods in machinery or apparatus where the quantity of dangerous goods exceeds the quantity specified in Column 7a of the Dangerous Goods List of Chapter 3.2 is authorized when approved by the competent authority. This proceeding is not applicable for UN 1202, UN 1203, UN 1223, UN 1863 and UN 3475."

3. Furthermore, we think the text in the first paragraph in SP xxx could be clarified. We are concerned that the provision might be misinterpreted, when the text is worded as proposed. With the proposed text, the word "with" "...with or in machinery..." could be misread in a way that permits for example a tank to be loaded beside any type of machinery or equipment without a specific connection between them.

4. We would prefer to have a text as follows: (new text underlined):

"xxx This entry applies to substances of UN 1202, UN 1203, UN 1223, UN 1863 and UN 3745 in excess of those amounts specified in column 7a of the Dangerous Goods List of Chapter 3.2 which are being carried in a packaging, IBC or tank directly connected with the machinery or equipment or ~~with or~~ in machinery or equipment carried as a load for the sole purpose of enabling that machinery of equipment to operate provided the following conditions are met."

5. Lastly, we also propose to clarify what kind of substances is considered as fuel in the proposed SP yyy, to make it more user-friendly (new text underlined):

"yyy This entry does not apply to equipment or machinery where the amounts of ~~fuel~~ substances of UN 1202, UN 1203, UN 1223, UN 1863 and UN 3745 being carried are in excess of those amounts specified in column 7a of the Dangerous Goods List in Chapter 3.2. For amounts in excess of column 7a of the Dangerous Goods List of Chapter 3.2, see Special Provision xxx."