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**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****Thirty-ninth session**

Geneva, 20–24 June 2011

Item 3 (a) of the provisional agenda

**Listing, classification and packing: proposals of amendments  
to the list of dangerous goods of Chapter 3.2****Limited quantity limit for asbestos of UN 2212 and UN 2590****Transmitted by the expert from the United Kingdom<sup>1</sup>****Background**

1. Prior to the thirty-fourth session of the Sub-Committee in December 1999 there were no provisions for the carriage of asbestos in limited quantities in the Model Regulations. At the seventeenth session (ST/SG/AC.10/C.3/34 paragraphs 81–84) the United States proposed a rationalisation of the amounts to be allocated to individual substances (ST/SG/AC.10/C.3/1999/60 and Corr.1). This proposal was adopted and can now be found in the "Guiding Principles for the Development of the Model Regulations" (Part 3).

2. During the debate at the session it was agreed that generally the allocation of limited quantities to Class 9<sup>2</sup> should be dealt with on a substance by substance basis (paragraphs 83–84). In the case of asbestos the Sub-Committee appears to have decided that for asbestos the following should apply<sup>2</sup>.

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2011–2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

<sup>2</sup> See note by the secretariat at the end of this document.

	UN Model Regulations, International Maritime Dangerous Goods Code, RID, ADR 2011		RID/ADR 2009	United States Code of Federal Regulations, Title 49 (49 CFR)
UN 2212	Packing Group II	1 kg	1 kg	5 kg
UN 2590	Packing Group III	0 kg	6 kg	5 kg

3. Although recognising that Class 9 should be dealt with substance by substance this allocation does appear to be inconsistent. The substance with lesser danger has no limited quantity whilst the greater has 1 kg.

4. For RID/ADR there have always been limited quantity values as shown above. However from 2011 they have aligned with the Model Regulations.

5. Nevertheless the expert from the United Kingdom believes it is important that small quantities of material can be removed from sites for analysis and that therefore there should be a limited quantity for the packing group III entry.

## Proposal

6. In column 7a for UN 2590 replace "0" with "5 kg".

### Note by the secretariat:

According to ST/SG/AC.10/C.3/34, Paras 82-84, only the allocation of limited quantities to Class 9, **Packing Group II**, was to be discussed on a substance by substance basis, and it was agreed to assign 1 kg to UN 2212. According to paragraph 82, 5 kg was assigned to all solid substances of Class 9 **Packing Group III**. This is confirmed in the list of adopted amendments (ST/SG/AC.10/C.3/34/Add.2) and confirmed again in the list of amendments adopted by the Committee (ST/SG/AC.10/27/Add.1). Therefore it seems that the current value of "0 kg", reflecting the word "NONE" appearing in the 11<sup>th</sup> and 12<sup>th</sup> revised edition of the Recommendations, is a mistake since this word "NONE" should have been changed to "5 kg" in the 12<sup>th</sup> revised edition.