

**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**

**20 June 2011**

**Thirty-ninth session**

Geneva, 20–24 June 2011

Item 5 (d) of the provisional agenda

**Miscellaneous proposals of amendments to the Model Regulations  
on the Transport of Dangerous Goods; miscellaneous**

**Comments to item 5 (d) Proposal for the harmonization for  
the transport of dangerous goods by sea and by road IMDG  
7.4.6.4.2**

**Transmitted by the International Tank Container Association (ITCO)**

This paper opposes the proposals made in ST/SG/AC.10/C.3/2011/2, for the following reasons

**Introduction**

The proposal is to amend the text of 7.1.3.3.1 by removing the reference to explosives and 7.1.3.3 by extending the scope to all classes of dangerous goods.

International Tank Container Association do not support this proposal because:

1. Extending the scope of the regulations appertaining to container structural serviceability to all classes of dangerous goods is not justified by any data.
2. The change would significantly add to industry costs because the criteria to define “structurally serviceable” to the world’s freight container fleet as set out in IMO Convention Safe Containers (CSC) differs greatly from that defined for containers to transport Class 1 explosives.
3. It is not clear what is meant by the proposal “as witnessed by a current International Convention”
4. Harmony of the regulations is better served by harmonising with IMO Convention of Safe Containers CSC.

ITCO, 09.06.2011

---