

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

12 October 2012

Forty-second session

Geneva, 3 – 11 December 2012

Item 4 of the provisional agenda

Cooperation with the International Atomic Energy Agency

Uranium hexafluoride – Subsidiary hazards

Note by the secretariat

1. When discussing the issue of classification of uranium hexafluoride samples (see ST/SG/AC.10/C.3/2012/101), questions were raised regarding the subsidiary hazards of UF₆, notably its oxidizing properties and more particularly its toxicity (see ST/SG/AC.10/C.3/2008/99, para. 15; ST/SG/AC.10/C.3/2011/46, para 8 and annex; informal document INF.36 submitted at the 40th session, informal document INF.52 submitted at the 41st session, paragraphs 20–22).

2. During these discussions, it was underlined that the question of subsidiary hazards concerned also UN Nos. 2977 and 2978 (see ST/SG/AC.10/C.3/2011/46, para. 8), and the secretariat was asked by several delegates why subsidiary hazards other than that of Class 8 had not been assigned to UN Nos. 2977 and 2978.

3. The Sub-Committee may wish to note that UN Nos. 2977 and 2978 were introduced in 1980 (see also informal document INF.18 submitted at the 40th session). At that time, the policy of the Committee was to avoid an unnecessary proliferation of hazard labels on packages, and this policy was reflected in paragraph 13.3.3 of the Recommendations as follows “In general no more than one danger label should be affixed to a package. However, since a substance or article may present more than one significant risk, e.g. fire and poisoning, the package should, in such case, bear in addition to the label corresponding to the primary risk, such additional labels as indicate important subsidiary risks. In general subsidiary risk labels need not be applied to packages to denote subsidiary risks of a Packing Group III hazard level”.

4. According to Table 13.1 of the Recommendations, at that time, for the Packing Group III hazard level subsidiary risk labels were required for divisions 4.2 and 4.3 only, and except for road and rail transport, for classes 3 and 8. No subsidiary risk labels were required for divisions 4.1, 5.1 and 6.1, Packing Group III, for any mode of transport.

5. Furthermore, paragraph 13.3.5.1 stated “Substances of Class 8 with a subsidiary risk of 6.1 need not show the subsidiary poison (toxic) risk label”.

It should also be recalled that the Class 7 label was in itself deemed to denote a radiotoxicity hazard, and the pictogramme recommended in the first Recommendations (1956) showed two symbols, a radiation symbol and a skull and crossbones symbol.

6. In view of the above policy, it seems most unlikely that the Committee would have required an additional division 6.1 label or division 5.1 label for material already required to bear a Class 7 label and a Class 8 label, even if it were aware that such a material possessed toxic or oxidizing properties.

