



**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****Forty-fourth session**

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Item 5 (f) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: marking and labelling****Excepted quantity provisions regarding counting of
packages, markings and documentation****Transmitted by the International Council of Chemical Associations
(ICCA)¹****Introduction**

1. The provisions for excepted quantities have been used for some time for carriage by all transport modes. Experience is now available and an issue regarding the limitation of packages per freight vehicle, railways freight wagon or multimodal freight container has been noticed. Therefore ICCA would like to propose a modification to the provisions for excepted quantities regarding the number of packages allowed per freight vehicle, railway freight wagon or multimodal freight container.

2. In the modern supply chain processes, it is very difficult to unload packages from a cargo transport unit when a certain amount of packages has been exceeded. Especially when carriers have different customers, they cannot decide, at the place of loading, to load only half of the consignment because the number of packages would exceed a certain limit. Limiting the load to 1000 package implies also limiting the net mass of the load to a maximum of 1 ton per freight vehicle, wagon or container (for E1, or even less depending on the E code assigned to the goods). This causes problems of logistics in case of carriage between the manufacturing site and warehouses since the full loading capacity of the cargo

¹ In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

transport unit cannot then be used. In particular road vehicles have to circulate nearly empty which is unsound from all standpoints, i.e. economics, environment protection and sustainable use of energy.

3. In addition mail services and parcel services refuse to transport excepted quantities, because it is very difficult for them to keep track of the number of packages and to limit this number to 1000, as they would have then to decide which packages would not be transported and to inform the customers accordingly. For excepted quantities it happens that the information which is communicated relates to a unit bought by the customer, which may contain several packages. The parcel services and carriers are then handling the consignments as pallets, not as a number of packages packed on a pallet. This does NOT affect the limitations which are allowed per package as described in the table in 3.5.1.2, these are assured by separate systems.

4. The 1000 package threshold was decided to avoid that a full container load of excepted quantities be transported as ocean freight when information on the contents is not available. Later, IMO decided to require that the dangerous goods carried in excepted quantities be fully described in the documentation required in Chapter 5.4, with the additional information "Dangerous goods in excepted quantities – XX packages" (3.5.6.1 IMDG Code). This doubles the information and makes the threshold requirement unnecessary. ICCA sees no reason to still limit the number of packages for these extremely small amounts of substances per package, as the same or bigger amounts can be shipped, as limited quantities under the provisions of Chapter 3.4, via road or ocean freight in packages consisting of only two envelopes (inner and outer packagings). The huge benefit of the EQ provisions is that they can be used for air and land transport without having to change the packagings. Therefore a limitation of the number of packages for road and sea transport is difficult to understand.

5. Therefore ICCA proposes the following change to the excepted quantity provisions regarding the number of packages per freight vehicle, railways freight wagon or multimodal freight containers.

Proposal

6. ICCA proposes deleting section 3.5.5 and amending section 3.5.6 to read as follows (new text underlined):

“3.5.6 Documentation

If a document (such as a bill of lading or air way bill) accompanies dangerous goods in excepted quantities, it shall include the statement “Dangerous Goods in excepted Quantities” and indicate the number of packages.”
