

## 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

14 June 2013

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Item 9 of the provisional agenda

Global harmonization of transport of dangerous goods regulations with the Model Regulations

### Report of the Editorial and Technical Group of the Sub-Committee on Dangerous Goods, Solid Cargoes and Containers

#### Transmitted by the International Maritime Organization (IMO)

1. The 19th session of the Editorial and Technical Group took place from 22 to 26 April 2013. The group was instructed to prepare the draft amendment 37-14 to the International Maritime Dangerous Goods (IMDG) Code (See full report DSC 18/7/1 in informal document INF.35).
2. While considering different proposals for inclusion in the draft amendment 37-14, the group identified various issues that should be brought to the attention of the UN TDG Sub-Committee for its consideration.
3. These issues are listed hereunder using the same paragraphs numbers as shown in the report of the E&T group and contained in document DSC 18/7/1 that is to be considered in September this year by the DSC Sub-Committee.

#### Transport provisions for UN 3166 and UN 3171

3.16 The group considered document DSC 17/3/12 (Belgium, France, Germany, United Kingdom, United States, DGAC and IVODGA), proposing amendments to Special Provisions (SPs) 961 and 962, in relation to the provisions for the transport of UN 3166 and UN 3171, which recently entered into force under amendment 35-10.

3.17 The group agreed on amendments to SP 961 and 962 and to the new special provision to differentiate UN 3166 from other UN entries, in particular from UN 3363 or those for fuels, as contained in annex 2. The group agreed that UN 3166 should apply to internal combustion engines with or without fuel tank attached, as well as to machinery containing a combustion engine, provided that requirements in Special Provisions 961 and 962 are met. Furthermore the group agreed that a declaration of consignment under UN 3166 and UN 3171 as marine pollutant is not necessary.

3.18 The group agreed that a differentiation between UN 3166 and other entries as well as the decision not to apply the criteria for marine pollutants to UN 3166 and 3171 may have multimodal impact and should be brought to the attention of the TDG Sub-Committee.

3.19 In this regard, the group noted that FP 56, having considered document FP 56/9/12 (IACS) seeking clarification of the relationship between the requirements of the IMDG Code and SOLAS chapter II-2 for the carriage of vehicles in spaces other than those identified in Special Provision 961, had sought advice on the safety aspects of the carriage of vehicles in those spaces from E&T 19 (DSC 18/7). Since SPs 961 and 962 have been

extensively modified, the group recommended the Sub-Committee, if agreed, to forward the draft amendments of SPs 961 and 962 to the FP Sub-Committee.

3.20 The group also considered document E&T 19/3/3 (DGAC), commenting on the applicability of SP 363 to UN 3166 and noted that the matter would be forwarded to the UN TDG Sub-Committee.

### **Marine pollutants**

3.24 The group considered document DSC 17/3/1 (IPPIC), proposing abbreviation MP/EH for "MARINE POLLUTANT/ENVIRONMENTALLY HAZARDOUS". The observer from IPPIC suggested to use the term Aquatic Pollutant or AP, regardless of their original proposal.

3.25 Following lengthy discussion on the proposed term and abbreviation, the group, taking into account that majority of the group preferred the term Aquatic Pollutant, supported the use of single term for all modes of transport, preferably Aquatic Pollutant.

3.26 The Group, noting that the issue relates to multi modal transport, agreed to invite the UN TDG Sub-Committee to consider the matter and invited delegates to inform the Joint Meeting (ADR/RID/ADN) of the outcome on the discussion and to request their opinion on the use of a common single term (Aquatic Pollutant) that could be suitable at least for documentation purposes.

### **Portable tanks**

3.28 The group considered document DSC 17/3/6 (CEFIC), proposing to remove obstacles to the proper placarding and marking of portable tanks having a capacity of less than 3,785 litres (1,000 gallons). Having noted that similar provision is already being used by land transport, referring to portable tanks having a capacity of less than 3,000 litres, agreed to the draft amendments to chapter 5.3 (provisions 5.3.1.1.4.1, 5.3.2.0.2, 5.3.2.2.1 and 5.3.2.3.2) of the IMDG Code, as contained in annex 2.

3.29 The group, noting that the problem is a multimodal issue, agreed to invite the UN TDG Sub-Committee to consider the proposal.

### **Proposals regarding water-reactive materials**

3.39 With regard to documents DSC 17/11, DSC 17/11/1 and DSC 17/INF.6 (Germany), related to stowage of water-reactive materials, which propose amendments to the IMDG Code concerning packing, stowage and segregation requirements and the EmS Guide relating to the fire schedules and schedule F-G, the group noted that MSC 91 had agreed that the DSC Sub-Committee should further consider the proposals in detail, which were forwarded to the E&T Group.

3.40 The group also considered document E&T 19/3 (CEFIC), commenting on the above documents, in particular regarding the applicability of the proposal for water reactive materials packaged in metal packagings, metal cylinders, metal IBCs and tanks and the segregation requirements proposed, and proposing some modifications thereon.

3.41 Regarding proposal 1 (New provisions on packing a container) in document DSC 17/11, the group, following discussion particularly on exemption on metal IBCs and on the term "dry condition", taking into account documents DSC 17/11 and E&T 19/3, agreed to the draft term "keep as dry as reasonably practicable" to all substances assigned

the requirements with F-G in Column (15) and insert appropriate text in 7.3.3.2, as contained in annex 2.

3.42 Regarding proposal 2 (Amendments to the packaging provisions), the group agreed for packagings to option 1 in document DSC 17/11, adding UN numbers to special packing provisions PP31 and PP40 and drafting a new special packing provision PP100. The group also agreed to the proposed amendments for IBCs and large packagings including new large packaging provisions L3 and L4, as included in annex 2.

3.43 The Group, noting the above amendments relate to multimodal transport, agreed to invite the UN TDG Sub-Committee to consider the matter.

3.44 The group agreed to proposal 3 (Amendments to the stowage categories) in document DSC 17/11 and draft amendments to the stowage categories for relevant substances, as contained in annex 2.

3.45 Regarding proposal 4 (Amendments to the stowage and segregation provisions) in document DSC 17/11, the group, after lengthy discussion on strengthening of segregation distance, taking into account documents DSC 17/11 and E&T 19/3, noted that the proposed amendments address the emergency procedures which could be addressed by the amendment to the segregation table in 7.2.4 together with further text on the distance from goods of class 2.1 and 3 and agreed to the amendments as contained in annex 2. The group, noting that those amendments have major impact on the stowage and segregation as well as the consideration of emergency procedures for the assignment of segregation levels is a new aspect, agreed to put the draft amendments in square brackets.

3.46 With regard to the proposed amendments to the EmS Guidelines (DSC 17/11/1), the group, generally supporting them, agreed draft amendments to the Guidelines, as contained in annex 3. The group finally requested the Secretariat to refer these draft amendments to FP 57 for its consideration.

### **Issues to be forwarded to the UN TDG Sub-Committee**

3.49 In addition to the matters contained above in paragraphs 3.18, 3.26, 3.29 and 3.43, the group identified the following issues during the consideration of harmonization with the UN Model regulations (18th edition) that should be brought to the attention of the UN TDG Sub-Committee:

- The definition of large salvage packaging might need to be reviewed regarding consistency with the definition of salvage packaging;
- The proposed amendments to provision 1.5.2.2 were not incorporated as they were deemed not necessary;
- Amendment to PSN of UN 1082 requires consequential amendments in P200 table 2, this was included in draft amendment 37-14 to the IMDG Code;
- Incorporation of editorial amendments to P505, P805;
- Some specimen labels show some differences on their symbols compared to those used in the UN Recommendations, IMO Secretariat is requested to use the format used by UNECE and a note to 5.2.2.2.2 allowing to minor variations has been included in draft amendment 37-14;
- SP 172 for UN 2977 and UN 2978 were deleted in order to harmonize with UN;
- The word "comprise" was replaced with the word "includes" in the new text of SP 225; and transitional provisions were included in SP 361 and SP 372.

**Draft amendment 37-14**

3.50 Subsequently, the group prepared draft amendment 37-14 to the IMDG Code, as set out in document DSC 18/7/1 (see informal document INF.35).

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