

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

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Item 6 (b) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations

on the Transport of Dangerous Goods: articles containing small quantities of dangerous goods

Articles containing dangerous goods

Transmitted by the expert from Germany

Introduction

1. In document ST/SG/AC.10/C.3/2013/20, a potential approach to the classification of articles is put up for discussion. The expert from Germany generally supports the approach presented in this document and would additionally like to raise the following further aspects which should be considered within the framework of the discussion:

2. The classification requirements should be reviewed with regard to their provisions relating to articles. In the UN Model Regulations, articles are included in part 2 in classes 1, 2, 7 and 9. For class 5.1, the UN Model Regulations stipulate that such substances may be contained in articles. For classes 3, 4.1, 4.2, 4.3, 5.2, 6.2 and 8, however, there are no provisions relating to articles. This has been implemented differently in the different mode-specific regulations. The provisions of the IMDG Code are identical to those in the UN Model Regulations while in ADR/RID articles containing dangerous substances are mentioned in more classes. An overview of the differing provisions is enclosed in the Annex. The UN Model Regulations should contain provisions relating to the classification of articles containing dangerous goods for all classes.

3. The discussion should not be limited to articles containing small quantities of dangerous goods, as also articles containing larger quantities of dangerous goods need to be transported. For articles containing a very small quantity of a dangerous good which is safely enclosed by the article, potential exemptions should be discussed in order to prevent over-regulation.

4. For larger articles, problems concerning packaging might arise; the provisions therefore also have to provide for the possibility of transport unpackaged. This could be implemented within the framework of the packing instructions assigned to the entries for articles or by means of an amendment to 4.1.3.8.

5. The classification of articles containing different dangerous goods should also be regulated.

6. There should be a clear delimitation from UN 3363 dangerous goods in machinery or dangerous goods in apparatus. As mentioned in document ST/SG/AC.10/C.3/2013/20, UN 3363 is often applied without observing the constraints resulting from special provision 301. There should be a possibility to transport articles and/or machinery containing dangerous goods which are not authorized to be transported in limited quantities.

Annex:

	UN Model Regulations	ADR/RID	IMDG Code
General	2.0.1.1 Substances and <u>articles</u> subject to these Regulations are assigned to on of nine classes according....	-	2.0.1.1 Substances and <u>articles</u> subject to these Regulations are assigned to on of nine classes according....
Class 1	2.1.1.1 Class 1 comprises: (a) explosive substances, (b) explosive articles (c) substances and articles not mentioned under (a) and (b)...	2.21.1.1 Class 1 comprises: (a) explosive substances, (b) explosive articles (c) substances and articles not mentioned under (a) and (b)...	2.1.1.1 Class 1 comprises: .1 explosive substances, .2 explosive articles .3 substances and articles not mentioned under .1 and .2...
Class 2	2.2.1.3 Class comprises articles charged with a gas and aerosols	2.2.2.1.3 The substances and articles of Class 2 are divided as follows... .6 Other articles containing gas under pressure 2.2.2.1.3 Substances and articles (except aerosols) are assigned to one of the following groups... 2.2.2.1.5 Substances and articles (except aerosols)...	2.2.1.3 Class comprises articles charged with a gas and aerosols
Class 3	-	2.2.3.1.1 The heading of Class 3 covers substances and articles containing substances of this Class	-
Class 4 Division 4.1	-	2.2.41.1 The heading of Class 4.1 covers flammable substances and articles, desensitized explosives which are solids according...	-

	UN Model Regulations	ADR/RID	IMDG Code
Class 4 Division 4.2	-	<p>2.2.42.1.1 The heading of Class 4.2 covers</p> <p>Pyrophoric substances...</p> <p>Self-heating substances and articles which are substances and articles... which on contact with air, without energy supply are liable to self-heating</p> <p>2.2.42.1.2 The substances and articles of Class 4.2 are subdivides...</p> <p>2.2.42.1.4 Substances and articles classified in Class 4.2 are listed in Table A...</p> <p>2.2.42.1.5 When substances or articles not mentioned by name are assigned...</p>	-
Class 4 Division 4.3	-	<p>2.2.43.1 The heading of Class 4.3 covers substances which react with water... and articles containing such substances.</p> <p>2.2.43.1.4 Substances and articles classified in Class 4.3 are listed in Table A...</p>	-
Class 5 Division 5.1	<p>2.5.1 (a)</p> <p>Such substances may be contained in an article</p>	<p>2.2.51.1.1 The heading of Class 5.1 covers substances which... and articles containing such substances</p> <p>2.2.51.1.2 The substances of Class 5.1 and articles containing such substances containing such substances</p> <p>2.2.51.1.3 Substances and articles classified in Class 5.1 are listed in Table A...</p>	2.5.1 Such substances may be contained in an article

	UN Model Regulations	ADR/RID	IMDG Code
Class 5 Division 5.2	-	-	-
Class 6 Division 6.1	-	-	-
Class 6 Division 6.2	-	-	-
Class 7	Radioactive material	Radioactive material	Radioactive material
Class 8	-	2.2.8.1 The heading of Class 8 covers substances and articles containing substances of this class...	-
Class 9	Comprises listed articles	Comprises listed articles	Comprises listed articles
Dangerous Goods in Machinery or Apparatus	Only if LQ is allowed, LQ limit has to be followed	1.1.3.1 (b) The carriage of machinery or equipment not specified in this Annex and which happen to contain dangerous goods in their internal of operational equipment	Only if LQ is allowed, LQ limit has to be followed