

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

26 June 2013

Forty-third session

Geneva, 24 – 28 June 2013

Agenda item 6 (a)

Miscellaneous proposals for amendments to the Model Regulations

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

Articles containing small quantities of dangerous goods : outline for discussion at the lunchtime working group

Note by the Government for the United Kingdom

Introduction

1. Following the discussions on the UK paper ST/SG/AC.10/C.3/2013/20 in plenary at the 43rd session, the UK noted the following points and circulated them as a basis for consideration during the subsequent lunchtime working group.
2. Although to some extent discussions have moved on as a result of this working group meeting, written comments are now invited on these and any other issues related to the paper, for the purpose of producing a further document for the 44th session.

Outline for discussions at lunchtime working group, 26 June 2013

Articles with small quantities of dangerous goods

Definitions

- Which terms should be defined? 'Article' and also possibly 'machinery', 'apparatus', 'equipment'.

Classification and identification

- How will an article be classified?
 - System has to be simple, so on the basis of what it contains..
 - Use criteria set out in Glossary. Possibly create form for saying how go into glossary.
- Suitable proper shipping names - variation on n.o.s concept (n.o.s. entry plus substance name/article description)
- More than one substance? Addressed in paras 12 and 14. Use table of precedence of hazards and packing group.
- What about modal issues? These can be considered later.

Packaging

- What standards would be required? Compliance with standards for placing on the market construction standards with associated handling conditions should be sufficient - to explore in the international context.
- Most articles went to P003, in the MR when packing instructions were developed.
- Quality assurance? As defined in the MR. May need to add specific details - take account of placing on the market rules
- EQ and LQ packages permitted for smaller quantities
- 903, 907 - perhaps add some additional guidance
- What about unpackaged articles? Suitable provisions must be added.

Quantities

- Should there be a de minimis quantity for DG in articles? Yes, probably based on EQ.
- Should there be an overall maximum quantity? No, but might want maximum quantity of some substances.

Hazard communication

- Reference to the proper shipping name? Yes, this would appear after the name of the substance (see para 14). To be amplified as necessary.
- How to identify? Labels, transport document, extras in special provisions if necessary.

Consequential amendments

- Are there any consequential amendments? Likely, text to be checked.s
- What should be done about existing articles? Current arrangements should stand until more experience has been gained..

Next steps

- The UK intends to prepare a further formal or INF paper for the 44th session and would welcome comments and inputs to this end.
