

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 November 2013

Forty-fourth session

Geneva, 25 November – 4 December 2013

Item 2 (b) of the provisional agenda

**Listing, classification and packing: Classification
inconsistencies (application of criteria versus
dangerous goods list)**

Classification inconsistencies (application of criteria versus dangerous goods list)

**Transmitted by the International Council of Chemical Associations
(ICCA)**

Basis for this document

In the Report of the Sub-Committee of Experts on the Transport of Dangerous Goods on its forty-third session held in Geneva from 24 to 28 June 2013, the following summary on the discussion is shown:

B. Classification inconsistencies (application of criteria versus dangerous goods list)

Informal document: INF.15 (CEFIC)

38. It was pointed out that the procedures for assigning a product to a UN number were explained clearly in chapter 2.0 of the Model Regulations. If a dangerous product was mentioned by name in the Dangerous Goods List, the transport conditions specified for that product should be applied irrespective of whether the name and description accounted for all hazards posed by the substance. Others believed a more appropriate name and description should be selected (for example an n.o.s entry) that reflected all hazards posed by the substance and related transport conditions. It was recognized that if new data on the dangerous properties of a product mentioned by name identified additional hazards, the new data should be submitted, using the form in Figure 1 of the Recommendations, for the Sub-Committee to decide on a new classification and the appropriate transport conditions. **ICCA was requested to prepare a text for the Guiding Principles to indicate the procedure to be followed until the classification was updated, particularly when there were differences between the labelling for transport and the labelling required under other regulations.**

1. Based on this text highlighted above the following proposals have been developed. There are 2 possibilities to add text to the guiding principles: in Part 2 and in Part 3.

For both Parts a proposal has been developed, but only one should be implemented.

2. The proposal is also based on the fact that there have been changes to substances listed by name in the past and there was no interim classification for these substances, although the additional classes discussed were class 6.1 and class 8. Therefore ICCA sees no need to have an interim solution. The substances listed by name have all been listed for many years and the classifications and the transport conditions have proven to be safe.

3. Beside this it is questionable whether all hazards need to be communicated for transport. It seems that there is a principle of "Precedence of hazards", which is applied in transport to avoid numerous labels, which may confuse the people involved in a transport. In most cases the number of classes is limited to 3. If this principle would no longer apply, a huge number of new UN-numbers would need to be generated to cover all possible combinations of classes.

PROPOSAL for Part 2

After:

...

When these definitions are used with the list of proper shipping names for dangerous goods, they provide guidance to those who are responsible for classifying substances; and a notable degree of standardization while retaining a flexibility that allows diverse situations to be taken into account. Classifications for substances in the Model Regulations are made on the basis of consideration of data submitted to the Sub-Committee of Experts on the Transport of Dangerous Goods by governments, intergovernmental organizations and other international organizations in the form recommended in Figure 1. However the actual data submitted are not formally endorsed by the Sub-Committee.

The changed parts of the text are in italic.

Add:

The substances and articles listed by name in column 2 of the list shall be transported as listed, unless and until additional data have been provided for review *only* to the UN Sub-Committee of Experts on TDG and *the entry has been changed accordingly in the next revised edition of the UN Model Regulations.* ~~this Sub-Committee has decided to change the entry in the list accordingly. A substance or an article listed by name may not require all hazards to be shown and the UN Sub-Committee of Experts on TDG may have decided to list the substance or the article only with the most severe hazards. A packing group may also have been assigned to describe the transport conditions rather than to reflect the classification.~~

4. Similar text may be needed in the UN Model Regulations, combined if needed with some theoretical examples.

~~• PROPOSAL 2 for Part 3~~

After:

~~**DANGEROUS GOODS LIST, LIMITED QUANTITY AND EXCEPTED QUANTITY PROVISIONS**~~

~~**Chapter 3.2, Dangerous Goods List**~~

~~The Dangerous Goods List in Chapter 3.2 lists the proper shipping names and UN numbers of substances most commonly transported. The list is not exhaustive but is intended to include, as much as possible, proper shipping names and UN numbers for substances that are of commercial importance. Additional information about the list is provided in Chapter 3.1.~~

~~A substance or article specifically listed by name in column 2 of the list, such as UN 1203, GASOLINE, is already classified and the requirements in the other columns of the list as well as the requirements in the body of the Model Regulations apply.~~

~~Add:~~

~~The substances and articles listed by name in column 2 of the list shall be transported as listed, unless and until additional data have been provided for review to the UN Sub-Committee of experts on TDG and this Sub-Committee has decided to change the entry in the list accordingly. A substance or an article listed by name may not require all hazards to be shown, and the UN Sub-Committee of Experts on TDG may have decided to list the substance or the article only with the most severe hazards. A packing group may also have been assigned to describe the transport conditions rather than to reflect the classification.~~
