

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

22 November 2013

Forty-fourth session

Geneva, 25 November – 4 December 2013

Item 2 (c) of the provisional agenda

Listing, classification and packing: miscellaneous

Comments on UN/SCETDG/44/INF.15 in relation with ST/SG/AC.10/C.3/2013/50: Introduction of provisions for the transport of adsorbed ammonia storage systems

Transmitted by the expert from France

1. The expert from France thanks the expert from Austria for the additional information related to adsorption and absorption.
2. It is true that some of the related products will be liable to belong to both categories. This discussion has started at the last session of the sub-committee and, in spite of being aware of that issue, the sub-committee recommended however to add the proposed special provision.
3. From a practical point of view, specifically for the products referred to in the proposal, there is no major difference between adsorption and absorption in relation with transport safety and the proposed design.
4. The proposals in the last part of document UN/SCETDG/44/INF.15 have already been discussed in former sessions of the subcommittee and have not been adopted because they create additional issues that would delay the adoption of simple measures to transport articles that are urgently needed, as this was demonstrated by the presentation offered by CLEPA.
5. The sub-committee may notice that the new special provision would be assigned to both UN 1005 AMMONIA ANHYDROUS and the new entry for adsorbed gases UN 3512 ADSORBED GAS TOXIC N.O.S. Therefore there are no obstacles to mention both adsorbed ammonia and absorbed ammonia in the special provision; this would be a simple way to solve the issue raised by the expert from Austria.

Proposal

6. Where the word “adsorbed” appears in the new special provision replace it with the words “adsorbed or absorbed”.
7. Where the word “adsorption” appears in the new special provision replace it with the words “adsorption or absorption”.