

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

26 June 2014

Sub-Committee of Experts on the Transport of Dangerous Goods

Forty-fifth session

Geneva, 23 June – 2 July 2014

Item 4 (b) of the provisional agenda

Listing, classification and packing:

Classification inconsistencies (application of criteria
versus dangerous goods list)

Comments from the informal discussion group on document 2014/23 – classification inconsistencies

Transmitted by the expert from Belgium

1. After an informal meeting during the coffee-break on Wednesday June 25th 2014, a discussion group reached consensus on the following approach to include text both in the Model Regulations and the Guiding Principles. The intention of this informal paper is to present this compromise view for consideration by the Sub-Committee, ask the secretariat to submit this document as a working paper for the next session and invite comments so as to be able to take a decision during the next session.

Proposed text for the UN Model Regulations

2. Add in 2.0.0 the following sentences:

Where a consignor has identified, on the basis of test data, that a substance listed by name in column 2 of the Dangerous Goods List in chapter 3.2 meets the classification criteria of a hazard class not identified in the list, the consignor shall communicate this to the competent authority, which shall propose amendments to the list as appropriate, based on the data provided by the consignor. The competent authority may, until the list is amended, permit the use of an appropriate description with additional hazard communication for that substance.

3. Include in 2.0.2.2 the following sentence:

The substances listed by name in column 2 of the Dangerous Goods List in chapter 3.2 shall be transported according to their classification in the list or under the conditions specified in 2.0.0.

Proposed text for the Guiding Principles

The substances listed by name in column 2 of the list shall be transported according to their classification in the list, until the UN subcommittee of experts on the transport of dangerous goods amends the list, based on new or additional test data provided by experts (e.g. national authorities, industry stakeholders). Where a consignor has identified, on the basis

of test data, that a substance listed by name meets the criteria of an additional hazard class not indicated in the table, the consignor may elect, with the approval of the competent authority, to use an appropriate description, which may be the existing UN entry or a generic or n.o.s. entry, to ensure that all hazards are communicated in transport.
