



**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****Forty-eighth session**

Geneva, 30 November – 9 December 2015

Item 6 (a) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations**on the Transport of Dangerous Goods: dangerous goods in machinery, apparatus or articles, N.O.S****Dangerous goods in machinery, apparatus or articles, N.O.S****Transmitted by the expert from the United Kingdom¹****Introduction**

1. At the forty-second session of the Sub-Committee it was agreed to place the issue of articles containing various quantities of dangerous goods on the programme of work for the biennium 2013-2014 and the issue has continued to be discussed at each meeting since then and is now in the work programme for this biennium.

Background

2. The expert from the United Kingdom had become aware in recent years that the number of consignments of dangerous goods in all modes assigned to the UN entry UN 3363 DANGEROUS GOODS IN MACHINERY or DANGEROUS GOODS IN APPARATUS seems to be growing inexorably. Numerous requests to exempt various items or objects containing a variety of individual or mixtures of dangerous substances of varying quantities from regulatory provisions have been received by competent authorities and it has been noted that the response to such requests is either to assign them to machinery or apparatus UN 3363 or to the appropriate entry for the substance concerned. However UN 3363 should only be used for dangerous substances which are within

¹ In accordance with the programme of work of the Sub-Committee for 2015–2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15).

permitted Limited Quantity amounts and that it may not always be possible or appropriate to consign articles to the appropriate entry for the substance concerned e.g. how would the article meet the packaging requirements?

3. In many cases the expert from the United Kingdom comes across consignments assigned to UN 3363 where that assignment is questionable. The belief is that this happens not because the consignor is trying to avoid more prescriptive measures, but that they simply do not fully consider the constraints placed on the use of UN 3363. They do not consider assignment to the correct entry for the substance contained in the machinery or apparatus because they view what is to be transported as an 'article' not a substance. Equally, it can sometimes be the case that the machinery or apparatus is a one-off item (often large and expensive) that will never be repeated. As a result, UN 3363 seems to be becoming a 'dumping ground' for items that fall into the "too difficult to decide" category. The question remains as to how to appropriately consign articles containing more than one dangerous substance and in quantities greater than permitted by limited quantities? Competent authorities even have difficulty in determining an appropriate entry for such articles. Therefore developing a standard harmonised procedure for classifying articles containing dangerous substance(s) as an integral element would be beneficial for consignors and competent authorities.

4. At the forty-seventh session, the Sub-Committee considered informal document INF.7 submitted by the United Kingdom which continued to seek a solution to the issue of the classification and transport of various dangerous goods contained as an integral element within machinery, apparatus or articles (which are necessary for its functioning and cannot be removed for the purposes of transport), which are not already included within the Dangerous Goods List of Chapter 3.2.

5. The paper was discussed during plenary and in a working group which met in the margins of plenary (a summary of the comments made can be found at the annex to this paper). As the paper was an informal document, the expert from the United Kingdom agreed to return to the forty-eighth session of the Sub-Committee with a further proposal which reflects the comments and suggestions made on informal document INF.7 (47th session).

6. One of the comments made by some delegations at the last session was that it was still not clear how to determine the primary risk and therefore which proposed UN entry would be appropriate. For the existing UN entry UN3363, this is not an issue as this entry is Class 9 regardless of the dangerous substances contained. However, it was widely expressed by the Sub-Committee in previous sessions that for dangerous substances in articles in quantities greater than limited quantity amounts, there is a need to identify the specific dangerous substances contained for hazard communication purposes and that a Class 9 entry would not suffice. A consequence of this is that classification in a specific class or division is necessary, but this requires identification of the primary hazard?

7. The United Kingdom expert has considered how to make the decision making process easier to follow and presents two alternatives within the proposal for the consideration of the Sub-Committee. One proposal presents text for inclusion in Chapter 2.0 of the Model Regulations as a principle for classifying articles which contain various dangerous goods which are not already listed in the dangerous goods list with additional text in Chapter 5.2 in relation to labelling. This text includes a flow diagram which aims to assist the user through the decision making process. The alternative proposal follows the approach previously taken in INF.7 which presents the text in a special provision modified to reflect comments made by experts at the last session. The United Kingdom would like experts to indicate which approach they would prefer.

Proposal

8. The following proposal contains two alternatives for the classification of articles but the remainder of the proposal is common to both whether Alternative 1 or Alternative 2 is followed. The proposed packing instruction P00X will follow in a separate paper. For ease of reference when reviewing the proposed text, the following are the proposed new UN entries (the full entry into the dangerous goods list is at paragraph 14):

UN Number	Class/Division
35AA	2.1
35BB	2.2
35CC	3
35DD	4.1
35EE	4.2
35FF	4.3
35GG	5.1
35HH	5.2
35II	6.1
35JJ	8
35KK	9

Alternative 1

9. Insert the following new section into Chapter 2.0 of the Model Regulations:

“2.0.5 Transport of articles containing dangerous substances not listed in the Dangerous Goods List

NOTE 1: The term ‘article’ also includes machinery and apparatus [except batteries].

NOTE 2: For articles which do not have an existing proper shipping name which contain only dangerous substances within the permitted limited quantity amounts specified in Column 7a of the Dangerous Goods List see UN entry 3363 and special provision 301.

2.0.5.1 When the dangerous substance(s) to be transported are contained within an article as an integral element necessary for the functioning of the article, in quantities in excess of those permitted in Column 7a of the Dangerous Goods List of Chapter 3.2 for the dangerous substance(s) contained, or if the transport of the dangerous substance(s) in accordance with the provisions of Chapter 3.4 is not authorized, then such articles shall be transported in accordance with this section.

2.0.5.2 Waste articles where the article is no longer capable of containing the dangerous substance(s), shall [not be transported in accordance with this section] [be subject to competent authority approval for transport] [be in accordance with

4.1.1.11]. Waste articles which still contain dangerous substances shall be classified in accordance with this section.

2.0.5.3 Articles containing dangerous substances of Class 1, Division 2.3, [Division 6.1], Division 6.2, Class 7 or radioactive substances which do not have an appropriate existing entry in the Dangerous Goods List of Chapter 3.2, shall not be transported in accordance with this section.

2.0.5.4 Articles containing dangerous substances shall be assigned to the appropriate Class or Division of the dangerous substance(s) it contains. This shall be established by the following:

(a) If the article contains one of the hazards listed in 2.0.3.1 b) to f) the article shall be classified as UN 35AA or UN35BB, UN 35CC, UN 35DD, UN 35EE, or UN 35HH, as appropriate, as these primary hazards always take precedence.

(b) Approval of the classification and transport conditions by the competent authority [of the country of origin] shall be necessary if the article contains more than one of the hazards listed in 2.0.3.1 b) to f).

(c) If the article does not contain one of the hazards listed in 2.0.3.1 but does contain more than one Class or Division not listed in 2.0.3.1 then the Class or Division to which it shall be classified is to be determined by the primary hazard present as determined by the Precedence of Hazards table in 2.0.3.3 of these Regulations for each of the dangerous substances contained in the article. If a Class 9 substance is contained within the article, all other dangerous substances shall be considered to present a higher hazard.

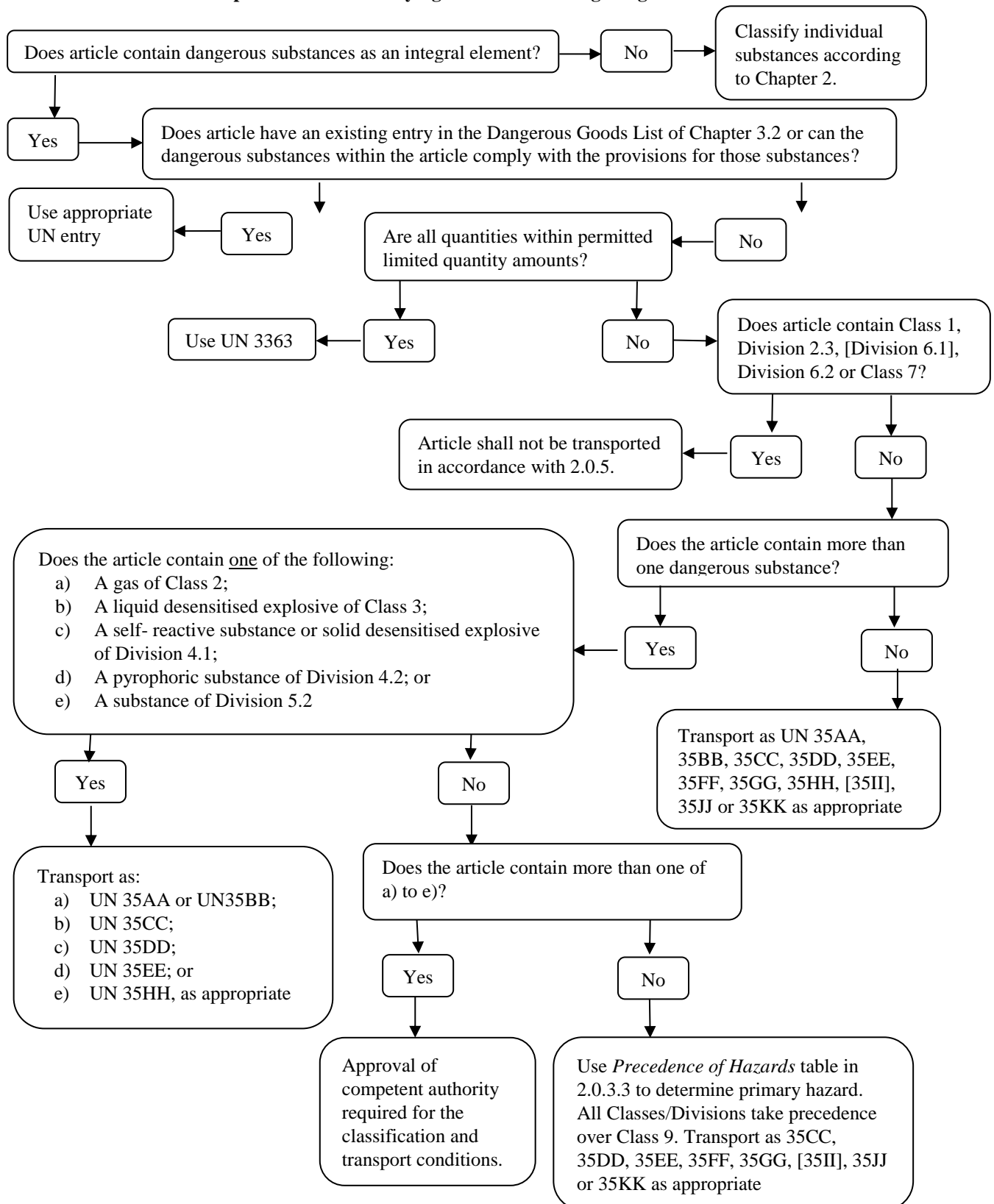
(d) Where any of the dangerous substances present in the article are within the permitted limited quantity amounts indicated in Column 7a of the Dangerous Goods List of Chapter 3.2, these dangerous substances shall not be considered when determining the primary hazard [as long as the cumulative total of each of these substances does not exceed 30 kg per article].

2.0.5.5 Subsidiary risks shall be representative of the primary hazard posed by the other dangerous substance(s) contained within the article or they shall be the subsidiary risk(s) identified in column 4 of the Dangerous Goods List when only one dangerous substance is present in the article.

2.0.5.6 To determine the appropriate name and description to be inserted in parenthesis after the Proper Shipping Name on the transport document as required in 5.4.1.5.13 when there are two or more dangerous substances in the same class or division, the packing groups of the substances shall be determined and the name of the substance presenting the highest danger according to their packing group shall be used as the substance presenting the primary hazard. Where there is no packing group or when two or more substances have the same highest danger level, then the name to be used on the transport document shall be that of the substance present in the greatest volume or mass.

Figure 2.0.5

Scheme of procedure for classifying articles containing dangerous substances



10. Add a new Special Provision XXX into Chapter 3.3 as follows:
- “XXX Production line manufactured articles containing dangerous substances shall be [subject to a quality control and management system] [constructed in compliance with the construction requirements specified by the competent authority of the country of origin, where these have been developed, and/or in accordance with a quality management system].”
11. Add a new section into Chapter 5.2 as follows:
- “5.2.2.1.13 *Labels for articles containing dangerous substances transported as UN Nos. 35AA, 35BB, 35CC, 35DD, 35EE, 35FF, 35GG, 35HH, [35II], 35JJ and 35KK*
- 5.2.2.1.13.1 Articles containing dangerous substances shall be labelled according to 5.2.2.1.2 reflecting the primary hazard and subsidiary risks established according to 2.0.5.
- 5.2.2.1.13.2 When it is required to ensure articles containing liquid dangerous goods remain in their intended orientation, orientation marks meeting 5.2.1.7.1 shall be affixed and visible on at least two opposite vertical sides of the packaged article where possible, with the arrows pointing in the correct upright direction.”

Alternative 2

12. Add a new Special Provision XXX into Chapter 3.3 as follows:
- “XXX For the purposes of this special provision ‘article’ includes machinery and apparatus.
- This entry applies to articles containing dangerous substance(s) as an integral element necessary for the functioning of the article, in quantities in excess of those permitted in Column 7a of the Dangerous Goods List of Chapter 3.2 for the dangerous substance(s) contained, or where the transport of the dangerous substance(s) in accordance with the provisions of Chapter 3.4 is not authorized. It shall not be used for articles for which a proper shipping name already exists in the Dangerous Goods List; waste articles; or for articles containing dangerous substances of Class 1, Division 2.3, [Division 6.1], Division 6.2, Class 7 or radioactive substances. Articles containing dangerous substance(s) where all the dangerous substances are within the permitted limited quantity amounts for the substances contained, shall be assigned to UN 3363.
- Production line manufactured articles containing dangerous substances shall be [subject to a quality control and management system] [constructed in compliance with the construction requirements specified by the competent authority, where these have been developed, and/or in accordance with a quality management system].
- Articles containing dangerous substances shall be classified in the same Class or Division as the classification of the dangerous substance it contains. When there is more than one dangerous substance within the article, the classification of the articles shall be established by the following:
- (a) If the article contains one of the hazards listed in 2.0.3.1 b) to f) the article shall be classified as UN 35AA or UN35BB, UN 35CC, UN 35DD, UN 35EE, or UN 35HH, as appropriate, as these primary hazards always take precedence.

(b) Approval of the classification and transport conditions by the competent authority [of the country of origin] shall be necessary if the article contains more than one of the hazards listed in 2.0.3.1 b) to f).

(c) If the article does not contain one of the hazards listed in 2.0.3.1 but does contain more than one Class or Division not listed in 2.0.3.1 then the Class or Division to which it shall be classified is to be determined by the primary hazard present as determined by the Precedence of Hazards table in 2.0.3.3 of these Regulations for each of the dangerous substances contained in the article. If a Class 9 substance is contained within the article, all other dangerous substances shall be considered to present a higher hazard.

(d) If any of the dangerous substances present in the article are within the permitted limited quantity amounts indicated in Column 7a of the Dangerous Goods List of Chapter 3.2, these dangerous substances shall not be considered when determining the primary hazard [as long as the cumulative total of each of these substances does not exceed 30 kg per article].

Subsidiary risks shall be representative of the primary risk posed by the other dangerous substance(s) contained within the article or they shall be the subsidiary risk(s) identified in column 4 of the Dangerous Goods List when only one dangerous substance is present in the article.

Articles shall be labelled according to 5.2.2.1.2 for the primary hazard and subsidiary risks as determined in this special provision. When it is required to ensure packages containing liquid dangerous goods remain in their intended orientation, orientation marks meeting 5.2.1.7.1 shall be affixed and visible on at least two opposite vertical sides where possible, with the arrows pointing in the correct upright direction.

To determine the appropriate name and description to be inserted in parenthesis after the Proper Shipping Name on the transport document as required in 5.4.1.5.13 when there are two or more dangerous substances in the same class or division, the packing groups of the substances shall be determined and the name of the substance presenting the highest danger according to their packing group shall be used as the substance presenting the primary hazard. Where there is no packing group or when two or more substances have the same highest danger level, then the name to be used on the transport document shall be that of the substance present in the greatest volume or mass.”

Proposal

13. The following proposed text forms part of the proposal regardless of whether Alternative 1 or Alternative 2 is followed.

14. Add the following new UN entries to Chapter 3.2 Dangerous Goods List and amend existing UN entries as follows (new text underlined, ~~deleted text strikethrough~~):

UN No.	Name and description	Class or division	Subsidiary risk	UN packing group	Special provisions	Limited and excepted quantities		Packagings and IBCs		Portable tanks and bulk containers	
						(7a)	(7b)	(8)	(9)	(10)	(11)
(1)	(2)	(3)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9)	(10)	(11)
-	3.1.2	2.0	2.0	2.0.1.3	3.3	3.4	3.5	4.1.4	4.1.4	4.2.5 / 4.3.2	4.2.5
<u>35AA</u>	<u>DANGEROUS GOODS IN ARTICLES, N.O.S.</u>	<u>2.1</u>	<u>See [SP XXX][2.0.5.4]</u>		<u>XXX</u>	<u>0</u>	<u>E0</u>	<u>P00X</u>			
<u>35BB</u>	<u>DANGEROUS GOODS IN ARTICLES, N.O.S.</u>	<u>2.2</u>	<u>See [SP XXX][2.0.5.4]</u>		<u>XXX</u>	<u>0</u>	<u>E0</u>	<u>P00X</u>			
<u>35CC</u>	<u>DANGEROUS GOODS IN ARTICLES, N.O.S.</u>	<u>3</u>	<u>See [SP XXX][2.0.5.4]</u>		<u>XXX</u>	<u>0</u>	<u>E0</u>	<u>P00X</u>			
<u>35DD</u>	<u>DANGEROUS GOODS IN ARTICLES, N.O.S.</u>	<u>4.1</u>	<u>See [SP XXX][2.0.5.4]</u>		<u>XXX</u>	<u>0</u>	<u>E0</u>	<u>P00X</u>			
<u>35EE</u>	<u>DANGEROUS GOODS IN ARTICLES, N.O.S.</u>	<u>4.2</u>	<u>See [SP XXX][2.0.5.4]</u>		<u>XXX</u>	<u>0</u>	<u>E0</u>	<u>P00X</u>			
<u>35FF</u>	<u>DANGEROUS GOODS IN ARTICLES, N.O.S.</u>	<u>4.3</u>	<u>See [SP XXX][2.0.5.4]</u>		<u>XXX</u>	<u>0</u>	<u>E0</u>	<u>P00X</u>			
<u>35GG</u>	<u>DANGEROUS GOODS IN ARTICLES, N.O.S.</u>	<u>5.1</u>	<u>See [SP XXX][2.0.5.4]</u>		<u>XXX</u>	<u>0</u>	<u>E0</u>	<u>P00X</u>			
<u>35HH</u>	<u>DANGEROUS GOODS IN ARTICLES, N.O.S.</u>	<u>5.2</u>	<u>See [SP XXX][2.0.5.4]</u>		<u>XXX</u>	<u>0</u>	<u>E0</u>	<u>P00X</u>			
<u>[35II</u>	<u>DANGEROUS GOODS IN ARTICLES, N.O.S.</u>	<u>6.1</u>	<u>See [SP XXX][2.0.5.4]</u>		<u>XXX</u>	<u>0</u>	<u>E0</u>	<u>P00X]</u>			
<u>35JJ</u>	<u>DANGEROUS GOODS IN ARTICLES, N.O.S.</u>	<u>8</u>	<u>See [SP XXX][2.0.5.4]</u>		<u>XXX</u>	<u>0</u>	<u>E0</u>	<u>P00X</u>			
<u>35KK</u>	<u>DANGEROUS GOODS IN ARTICLES, N.O.S.</u>	<u>9</u>	<u>See [SP XXX][2.0.5.4]</u>		<u>XXX</u>	<u>0</u>	<u>E0</u>	<u>P00X</u>			

3363	DANGEROUS GOODS IN MACHINERY, or DANGEROUS GOODS IN APPARATUS ARTICLES, N.O.S. <u>in limited quantities</u>	9	301	0	E0	P907
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15. Amend Special Provision 301 in Chapter 3.3 as follows (new text underlined, deleted text ~~strikethrough~~):

“301 This entry only applies to ~~machinery, articles or apparatus~~ containing dangerous substances as a residue or an integral element of the ~~machinery, article or apparatus~~. It shall not be used for ~~machinery, articles or apparatus~~ for which a proper shipping name already exists in the Dangerous Goods List of Chapter 3.2. ~~Machinery, Articles and apparatus~~ transported under this entry shall only contain dangerous goods which are authorized to be transported in accordance with the provisions of Chapter 3.4 (Limited quantities). The quantity of dangerous goods in ~~machinery, articles or apparatus~~ shall not exceed the quantity specified in Column 7a of the Dangerous Goods List of Chapter 3.2 for each item of dangerous goods contained. If the ~~machinery, article or apparatus~~ contains more than one item of dangerous goods, the individual substances shall not be capable of reacting dangerously with one another (see 4.1.1.6). When it is required to ensure liquid dangerous goods remain in their intended orientation, package orientation labels meeting 5.2.1.7.1 shall be affixed and visible on at least two opposite vertical sides where possible, with the arrows pointing in the correct upright direction.

The competent authority may exempt from regulation ~~machinery, articles or apparatus~~ which would otherwise be transported under this entry. ~~The transport of dangerous goods in machinery or apparatus where the quantity of dangerous goods exceeds the quantity specified in Column 7a of the Dangerous Goods List of Chapter 3.2 is authorized when approved by the competent authority, except where special provision 363 applies.”~~

16. Insert the following new packing instruction into 4.1.4.1 as follows:

See INF.XX for proposals for the packing instruction P00X

17. Add a new paragraph to 5.4.1.5 as follows:

“5.4.1.5.13 *Dangerous goods in articles, N.O.S*

For UN Nos. 35AA, 35BB, 35CC, 35DD, 35EE, 35FF, 35GG, 35HH, [35II], 35JJ and 35KK, in addition to the Proper Shipping Name, the transport document shall additionally bear in parenthesis the name and description of the dangerous goods presenting the primary hazard (as indicated in column 2 of the Dangerous Goods List) [and subsidiary risks] contained in the article as determined by [section in 2.0.5] [special provision xxx] of these regulations.

Example: for an article containing two dangerous substances, one of Class 3 and one of Class 8:

UN35CC, DANGEROUS GOODS IN ARTICLES, N.O.S, (Pyrrolidine), [(Chlorite Solution)] 3, (8)

For waste articles where the article still contains dangerous substances, the proper shipping name shall be amended in accordance with 5.4.1.4 c).”

Consequential amendments

18. Add a new paragraph to Chapter 1.1 as follows:

“1.1.1.10 **Dangerous substances in articles**

Articles containing dangerous substances shall not be subject to these regulations where the quantity of dangerous substances contained within the article is below the quantity permitted in Excepted Quantities as indicated in Column 7b of the Dangerous Goods List in Chapter 3.2 for all the dangerous substances contained.”

19. Amend the proper shipping name for UN3363 in the Dangerous Goods List of Chapter 3.2 as follows (new text underlined, ~~deleted text strikethrough~~):

“3363 DANGEROUS GOODS IN MACHINERY ~~or DANGEROUS GOODS IN APPARATUS~~ ARTICLES, N.O.S. in limited quantities”

(Amendment would also need to be made to the alphabetical index, to Appendix A, List of Generic and N.O.S. Proper Shipping Names and to Chapter 2.9)

20. Amend 4.1.3.8.1 as follows (new text underlined):

“4.1.3.8.1 Where large and robust articles cannot be packaged in accordance with the requirements of Chapters 6.1 or 6.6 and they have to be carried empty, uncleaned and unpackaged or they cannot be packaged in accordance with P00X, the competent authority of the country of origin may approve such carriage. In doing so the competent authority shall take into account that.” [*the remainder of text is to remain the same*].

21. Amend Packing Instruction P907 in 4.1.4.1 as follows (new text underlined, ~~deleted text strikethrough~~):

“P907 If the article ~~machinery or apparatus~~ is constructed and designed so that the receptacles containing the dangerous goods are afforded adequate protection, an outer packaging is not required. Dangerous goods in articles ~~machinery or apparatus~~ shall otherwise be packed in outer packagings constructed of suitable material, and of adequate strength and design in relation to the packaging capacity and its intended use, and meeting the applicable requirements of 4.1.1.1.

Receptacles containing dangerous goods shall conform to the general provisions in 4.1.1, except that 4.1.1.3, 4.1.1.4, 4.1.1.12 and 4.1.1.14 do not apply. For Division 2.2 gases, the inner cylinder or receptacle, its contents and filling density shall be to the satisfaction of the competent authority of the country in which the cylinder or receptacle is filled.

In addition, the manner in which receptacles are contained within the article ~~machinery or apparatus~~, shall be such that under normal conditions of transport, damage to receptacles containing the dangerous goods is unlikely; and in the event of damage to receptacles containing solid or liquid dangerous goods, no leakage of the dangerous goods from the article ~~machinery or apparatus~~ is possible (a leakproof liner may be used to satisfy this requirement).

Receptacles containing dangerous goods shall be so installed, secured or cushioned as to prevent their breakage or leakage and so as to control their movement within the article ~~machinery or apparatus~~ during normal conditions of transport. Cushioning material shall not react dangerously with the content of the receptacles. Any leakage of the contents shall not substantially impair the protective properties of the cushioning material.”

22. Amend the first sentence of 2.0.3.1 to read (new text underlined):
- “2.0.3.1 Precedence of hazard characteristics
- The table below shall be used to determine the class of a substance, mixture or solution having more than one risk, when it is not named in the Dangerous Goods List in Chapter 3.2 or to determine the appropriate entry for dangerous goods in articles N.O.S (UN Nos. 35AA to 35KK, see 2.0.5)”. *[The rest is to remain unchanged]*
23. Amend 2.3.1.1 to read as follows (new text underlined, ~~deleted text strikethrough~~):
- “Class 3 includes the following substances and articles containing substances of this class: [...]”
- Amend 2.4.1.1 to read as follows:
- “The substances of Class 4 and articles containing such substances are divided into three divisions as follows: [...]”
- Amend 2.4.2.1 to read as follows:
- “Division 4.1 includes the following types of substances and articles containing such substances: [...]”
- Amend 2.4.3.1.1 to read as follows:
- “Division 4.2 includes the following types of substances and articles containing such substances: [...]”
- Insert the following new text in the beginning of 2.4.4.1:
- “Division 4.3 includes substances and articles containing such substances which ~~Certain substances~~ in contact with water [...]”
- Amend 2.5.1 to read as follows:
- “The substances of Class 5 and articles containing such substances are divided into two divisions as follows: [...]”
- [Amend 2.6.1 to read as follows:
- “The substances of Class 6 and articles containing such substances are divided into two divisions as follows:
- (a) Division 6.1 Toxic substances
- Division 6.1 includes substances liable either to cause death or serious injury or to harm human health swallowed or inhaled or by skin contact and articles containing such substances;”]
- Amend 2.8.1 as follows:
- “Class 8 ~~substances (corrosive substances) are~~ includes substances which, by chemical action, will cause severe damage when in contact with living tissue, or, in the case of leakage, will materially damage, or even destroy, other goods or the means of transport and articles containing such substances”.

Annex

Summary of comments made on informal document INF.7 at the forty-seventh session

1. Articles should be required to meet construction requirements and/or under a quality management system but it was noted that they may not exist in all circumstances.
2. How to classify according to Class 9 needed to be made clearer.
3. Support for amending the PSN of UN 3363 was voiced.
4. The [] text in 7(c) should be moved to the end of the first paragraph of the Special Provision.
5. Delegates felt that meeting P200 was unachievable but it was suggested that “Shall be capable of the same level of protection as P200” could be specified instead.
6. Consider whether it is appropriate to retain the Note in 4.1.3.8.2.
7. There was support for ‘article’ to cover ‘machinery and apparatus’.
8. It was suggested to change ‘dangerous goods’ to ‘dangerous substances’.
9. A consequential amendment for Class 9 in 2.9.3.1.1, is required to include “or articles containing such substances”.
10. How is precedence of hazard to be determined if it is not covered by the precedence of hazards table in 2.0.3.3 i.e. Class 2, Division 5.2?
11. Should the amount of dangerous goods be taken into account? No answer could be provided for an amount which would be appropriate for all possible substances.
12. Some suggestions were made regarding which Classes/Divisions should be outside the scope of the proposal (in addition to Class 1 and Class 7) e.g. Division 2.3, 6.1 and 6.2.
13. There was a concern that it may not always be possible to fully ‘enclose’ the dangerous goods and whether a receptacle always present.
14. The hazard communication for subsidiary risk is important and more detailed requirements should be in specified for their labelling and inclusion on the transport document.
15. The reference to SP 375 was confusing in SP301.
16. Greater guidance on how to identify which entry would be appropriate to use for which article could be beneficial.
17. Consideration should be given to waste articles.
18. Labelling provisions for articles should be included in Chapter 5 of the Model Regulations and Classification should be dealt with in Chapter 2.
19. Did amending the PSN for UN3363 making it an n.o.s entry mean that a technical name is now required? It is not required for the existing entry.
20. Is it justifiable to exclude non listed batteries from the scope?