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Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Explanatory notes for assigning articles to UN No. 3363

Transmitted by the expert from Switzerland

Summary

Executive summary: This proposal intends to simplify the provisions concerning classification of articles in 2.1.5 of document INF. 3.

Measure to be taken: Replace the text in Note 2 of 2.1.5 with a new special provision for UN.

Introduction

1. The implementation of the new entries UN 3537 – 3548 induces some doubts between users and authorities. It is not clear how to classify the articles.
2. In 2.1.5.1 the choice is given to classify either under the proper shipping name for the dangerous goods they contain or in accordance with section 2.1.5. In 2.1.5.3 it is said that the section 2.1.5 does not apply to articles for which a more specific proper shipping already exists in Table A of Chapter 3.2.
3. The Note 1 underlines this rule and explains that in case of articles which do not have an existing proper shipping name and which contain only dangerous goods within the LQ quantities the entry UN No. 3363 has to be used. This is in conformity with the rules laid down in 2.1.2.5.
4. Note 2 proposed in 2.1.5 in INF.3 is extremely difficult to understand and does not solve all the problems arising by implementing these rules. We feel the problem raised by Sweden and UK in INF.47 of the last Joint Meeting in September is already solved in the text adopted in 2.1.5.3 where it is stated that “this section applies to articles for which a more specific proper shipping name already exists in Table A of chapter 3.2”. This corresponds also to the principles of classification 2.1.2.5. UN 3363 DANGEROUS GOODS IN MACHINERY is a generic entry of Typ B according to 2.1.1.2 and following 2.1.2.5 has precedence in relation to UN 3537 – 3547 which are specific entries of Type C according to 2.1.1.2. According to both rules (2.1.2.5 and to 2.1.5.3) UN 3363 has precedence to UN 3537 – 3547 and the note 2 seems to us unnecessary.
5. Moreover the note 2 does not solve maybe more important problems for the participants. Participant using machinery eventually fill the machinery with some dangerous goods (cleaning product for example) before the transport, uses the product at destination and

returns with the machinery empty uncleaned. For the first journey one of the entries UN 3537- 3548 can be used but for the return empty uncleaned journey only UN 3363 is allowed. Such reclassification for the same article depending in the amount contained is far from practicable.

5. We would for this reason replace the text in the proposed Note 2 in 2.1.5 by the following proposal.

Proposal

7. Replace the text of Note 2 in 2.1.5 in INF 3 by the following text.

“In case of articles eligible as entries UN Nos. 3537 to 3547 the classification as UN No. 3363 is not necessary by carriage of those articles empty uncleaned in quantities not exceeding the quantity specified in column (7a) of Table A of Chapter 3.2.”
