

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

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Item 6 of the provisional agenda

New proposals for amendments to the Model

Regulations on the Transport of Dangerous Goods

Differences between the English and French versions in 6.8.3.3.c) ii) and 6.7.3.5.5 of the Model Regulations

Transmitted by the expert from Belgium

Introduction

1. In Belgium several issues have arisen concerning differences between the French and English version of the modal regulations on the transport of dangerous goods. Some of these differences trace back to text that was originally in the Model Regulations and may lead to a differing implementation of the regulations on the transport of dangerous goods. As such, we hereby propose to amend the model regulations such that these differences are eliminated.
2. A first issue that has arisen concerns paragraph 2.8.3.3 c) ii) of the 20th revised edition of the Model Regulations. The English version of this paragraph reads as follows:

Are judged not to cause irreversible damage of intact skin tissue but which exhibit a corrosion rate on either steel or aluminium surfaces exceeding 6.25 mm a year at a test temperature of 55 °C when tested on both materials. For the purposes of testing steel, type S235JR+CR (1.0037 resp. St 37-2), S275J2G3+CR (1.0144 resp. St 44-3), ISO 3574 or Unified Numbering System (UNS) G10200 or a similar type or SAE 1020, and for testing aluminium, nonclad, types 7075-T6 or AZ5GU-T6 shall be used. An acceptable test is prescribed in the Manual of Tests and Criteria, Part III, Section 37.

The French version of this paragraph nevertheless reads:

les matières dont on juge qu'elles ne provoquent pas une lésion irréversible du tissu cutané intact, mais dont la vitesse de corrosion sur des surfaces soit en acier soit en aluminium dépasse 6,25 mm par an à la température d'épreuve de 55 °C, lorsque les épreuves sont réalisées sur ces deux matériaux. Pour les épreuves sur l'acier, on doit utiliser les types S235JR+CR (1.0037, respectivement St 37-2), S275J2G3+CR (1.0144, respectivement St 44-3), ISO 3574, "Unified Numbering System" (UNS) G10200 ou SAE 1020, et pour les épreuves sur l'aluminium les types non revêtus 7075-T6 ou AZ5GU-T6. Une épreuve acceptable est décrite dans le Manuel d'épreuves et de critères, troisième partie, section 37.

3. As is indicated by the dashed underling, according to the English version of the Model Regulations, a type of steel similar to Unified Numbering System (UNS) G10200 may be used, while this is not the case according to the French version of the Model Regulations, where only UNSG10200 is mentioned. As such different types of steel may be used for the purpose of

testing corrosivity according to paragraph 2.8.3.3 c) ii) depending on whether the legal texts in place are based on the English or the French version of the Model Regulations on the Transport of Dangerous Goods.

4. After consultation of the Secretariat, it was pointed out that these texts were introduced in the thirteenth revised edition of the Model Regulations. At its 21st session the Sub-Committee adopted text between square brackets that indeed contained the mention “or similar type” for both the French and the English language versions of the Model Regulations. These texts were taken up in the consolidated list of amendments for examination by the Sub-Committee at its 22nd session (see 2.8.2.5 c) ii)).

<http://www.unece.org/fileadmin/DAM/trans/doc/2002/ac10c3/ST-SG-AC10-C3-2002-60e.pdf>
<http://www.unece.org/fileadmin/DAM/trans/doc/2002/ac10c3/ST-SG-AC10-C3-2002-60f.pdf>

5. Furthermore we also received information from the Secretariat these texts were re-examined during the 22nd session of the Sub-Committee based on an official document and an informal document. Nevertheless, the mention “or similar type” wasn’t mentioned in neither of both documents.

<http://www.unece.org/fileadmin/DAM/trans/doc/2002/ac10c3/ST-SG-AC10-C3-2002-61e.pdf>
<http://www.unece.org/fileadmin/DAM/trans/doc/2002/ac10c3/UN-SCETDG-22-inf26e.pdf>

6. Finally, the Secretariat informed us that the mention “or similar type” could also not be found in neither of the language versions in the consolidated list of amendments to the 12th revised edition of the Model Regulations on the Transport of Dangerous Goods which were adopted after the 22nd session of the Sub-Committee.

<http://www.unece.org/fileadmin/DAM/trans/doc/2003/ac10/ST-SG-AC10-29a1e.pdf>
<http://www.unece.org/fileadmin/DAM/trans/doc/2003/ac10/ST-SG-AC10-29a1f.pdf>

7. As such, this lead to the conclusion that the mention “or similar type” in the English version of the Model Regulations was retained by accident and was also not noticed during the recent rewriting of chapter 2.8. of the Model Regulations on the Transport of Dangerous Goods. To ensure a consistent application of the Model Regulations on using different types of steel during the testing of corrosive substances, we therefore propose to align the English version of the Model Regulations towards the French version (See proposal 1, paragraph 11).

8. A second issue that has recently arisen in Belgium concerns paragraph 6.7.3.5.5 of the Model Regulations on the Transport of Dangerous Goods. It was found that the English version of this paragraph reads as follows:

In addition to filling, discharge and gas pressure equalizing orifices, shells may have openings in which gauges, thermometers and manometers can be fitted. Connections for such instruments shall be made by suitable welded nozzles or pockets and not be screwed connections through the shell.

While the French version of this paragraph reads as follows:

Les réservoirs, en plus des orifices de remplissage, de vidange et d'équilibrage de pression de gaz, doivent être pourvus d'orifices utilisables pour l'installation de jauges, de thermomètres et de manomètres. Le raccordement de ces appareils doit se faire par des embouts ou poches appropriés soudés et non pas par des embouts vissés à travers le réservoir.

9. As indicated by the dashed underlining, “may” is translated here as “doivent être”, which is incorrect as “doivent être” translates to “must” or “shall” in English. As a consequence the use of either the English or the French version of the Model Regulations can lead to interpretation differences and consequentially a differing application of the Model Regulations. I.e., when applying the English paragraph one can choose whether openings for gauges, thermometers or

manometers are made in the shell or not; when applying the French paragraph, it is mandatory to have openings for gauges thermometers or manometers in the shell.

10. To ensure a consistent application of the Model Regulations and given the fact that a paragraph requiring that openings for gauges, thermometers or manometers must always be present could not be retrieved, we therefore propose to align the French version of the Model Regulations towards the English version (See proposal 2, paragraph 12).

Proposal 1

11. Amend the English version of paragraph 6.8.3.3 c) ii) of the Model Regulations on the Transport of Dangerous Goods to read as follows (deleted text stricken through):

Are judged not to cause irreversible damage of intact skin tissue but which exhibit a corrosion rate on either steel or aluminium surfaces exceeding 6.25 mm a year at a test temperature of 55 °C when tested on both materials. For the purposes of testing steel, type S235JR+CR (1.0037 resp. St 37-2), S275J2G3+CR (1.0144 resp. St 44-3), ISO 3574 or Unified Numbering System (UNS) G10200 or ~~a similar type or~~ SAE 1020, and for testing aluminium, nonclad, types 7075-T6 or AZ5GU-T6 shall be used. An acceptable test is prescribed in the Manual of Tests and Criteria, Part III, Section 37.

Proposal 2

12. Amend the French version of paragraph 6.7.3.5.5 of the Model Regulations on the Transport of Dangerous Goods to read as follows (deleted text stricken through, new text underlined):

Les réservoirs, en plus des orifices de remplissage, de vidange et d'équilibrage de pression de gaz, ~~doivent~~ peuvent être pourvus d'orifices utilisables pour l'installation de jauges, de thermomètres et de manomètres. Le raccordement de ces appareils doit se faire par des embouts ou poches appropriés soudés et non pas par des embouts vissés à travers le réservoir.
