

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

23 November 2018

**Sub-Committee of Experts on the
Transport of Dangerous Goods**

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Item 6 of the provisional agenda

**New proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods**

**Comment on ST/SG/AC.10/C.3/2018/73 – editorial correction
to SP 172 (d)**

Transmitted by the International Air Transport Association (IATA)

1. In document ST/SG/AC.10/C.3/2018/73 the Expert from Germany proposes an editorial correction to special provision 172 (d) to replace “subsidiary class” with “subsidiary hazard” on the basis that the term “subsidiary class” is not used in the Model Regulations.

2. While that is true, IATA believes that a better change would be to restructure the wording of special provision 172 (d) to more clearly set out the condition. As such IATA proposes that subparagraph (d) of special provision 172 be revised to read as follows:

(d) The dangerous goods transport document shall indicate the ~~subsidiary~~ class or division of the subsidiary hazard and, where assigned the packing group as required by 5.4.1.4.1(d) and (e).
