

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

26 November 2019

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

Fifty-sixth session

Geneva, 4-10 December 2019

Item 7 of the provisional agenda

**Global harmonization of transport of dangerous
goods regulations with the Model Regulations**

**Outcome of the thirty-second session of the Editorial and
Technical Group (the IMDG Code)¹**

Submitted by the International Maritime Organization (IMO)

**Report to the Sub-Committee on Carriage of Cargoes and
Containers**

1 General

Introduction

1.1 The thirty-second session of the Editorial and Technical Group (E&T) of the Sub-Committee on Carriage of Cargoes and Containers (CCC) met from 16 to 20 September 2019 and was chaired by Mr. Steven Webb (United States).

Instructions to the E&T Group

1.3 The Sub-Committee at its sixth session authorized E&T 32 to finalize the draft amendments (40-20) to the IMDG Code, based on documents submitted to CCC 6 and taking into account comments made and decisions taken by the Sub-Committee, with a view to submitting the draft amendments to MSC 102 for consideration and adoption; and to submit a written report to CCC 7. The Sub-Committee also instructed E&T 32 to carry out a comprehensive review of the footnotes in the IMDG Code when preparing amendment (40-20) to the IMDG Code.

1.4 The Group was further instructed to finalize the editorial corrections to amendment 39-18 of the Code (resolution MSC.442(99)) and requested the Secretariat to issue them before 1 January 2020, the date when amendment 39-18 enters into force.

¹ Only the relevant paragraphs of the report of the E&T Group (E&T 32/WP.1) are reproduced in this document, using its original paragraph numbering. The whole report of the E&T Group can be found in: [https://docs.imo.org/CCC/6/E&T32/Working Papers/ E&T 32/WP.1](https://docs.imo.org/CCC/6/E&T32/Working%20Papers/E&T%2032/WP.1).

1.5 Additionally, the Group was instructed to prepare related recommendations and circulars for submission to MSC 102 for approval, together with the adoption of amendments to the IMDG Code.

2 Finalization of draft editorial corrections to the amendments to the IMDG Code (Amendment 39-18)

Editorial corrections

2.1 Having considered the proposals in documents CCC 6/6/1 (Secretariat), CCC 6/6/4 (France) annex 2, and CCC 6/6/5 (France), the Group finalized the editorial corrections applicable to the English version of amendment 39-18 to the IMDG Code (resolution MSC.442(99)), as set out in annex 1.

2.2 With regard to the remark in paragraph 3 in document CCC 6/6/1, i.e. that some entries in the Dangerous Goods List in chapter 3.2 of the IMDG Code contain references to explosive limits (e.g. for UN 1144, "Explosive limits: 1.4% to ..."), the Group agreed to amend the references to clarify that those references are made to lower explosive limits. The corresponding amendments, as prepared by the Group, are set out in annex 1. In this context, the Group invited interested Member States and international organizations to submit additional information on explosive limits to CCC 7, for possible further consideration.

2.3 Based on document CCC 6/6/4 (annex 1), the Group finalized the editorial corrections applicable to the French version of amendment 39-18 to the IMDG Code (resolution MSC.442(99)), as set out in annex 2.

2.4 The Group also finalized the editorial corrections applicable to the Spanish version of amendment 39-18 to the IMDG Code (resolution MSC.442(99)), as set out in annex 3.

2.5 The Group requested the Secretariat to issue the separate corrigenda (English, French and Spanish), containing the editorial corrections to resolution MSC.442(99) on amendments to the IMDG Code, before the entry into force of amendment 39-18 (1 January 2020).

2.6 In this context, the Group also requested the Secretariat to inform UN SCE TDG 56 on the following relevant matters for their consideration:

.1 in 2.6.2.2.3 of the IMDG Code, the Group agreed to replace the words "the grouping has been based" with the words "the assignment has been based"; and

.2 in appendix B of the IMDG Code and corresponding Model Regulations, with regard to FUSE, INSTANTANEOUS, NON-DETONATING- (QUICKMATCH), there are differences between the English, French and Spanish language texts concerning description "Article consisting of cotton yarns impregnated with fine black powder (Quickmatch). It burns with an external flame and is used in ignition trains for fireworks, etc."

3 Finalization of draft amendments (40-20) to the IMDG Code

Draft amendments (40-20) to the IMDG Code (prepared by E&T 31)

Footnotes

3.14 As instructed by the Sub-Committee, the Group carried out a comprehensive review of the footnotes contained in the IMDG Code when preparing the draft amendment (40-20) to the IMDG Code. The Group noted the advice from MSC and the Secretariat that authentic

texts of IMO instruments do not include footnotes, and that regulatory requirements should not appear in footnotes to the IMDG Code.

3.15 Before embarking on the review, the Group had a discussion on the method of work and agreed, in general, to:

- .1 retain a footnote when containing references to other instruments;
- .2 inform UNTDG about a footnote when containing regulatory text found in the UN Model Regulations;
- .3 delete a footnote when containing outdated transitional references;
- .4 update a footnote if appropriate; and
- .5 move text in a footnote to the appropriate regulatory part of the IMDG Code if the footnote contains IMDG Code-specific regulatory requirements.

3.16 After the comprehensive review of the footnotes and based on the above principles, the Group agreed to include the corresponding amendments into the draft amendment (40-20) to the IMDG Code, as set out in annex 4.

3.17 In this context, and in view of harmonization, the Group also requested the Secretariat to inform UN SCE TDG 56 on the following relevant matters:

- .1 with regard to the first footnote ("INFCIRC/274/Rev.1, IAEA, Vienna (1980).") in 1.4.3.2.3, it should be considered if updating the reference to the latest version is appropriate and also whether it should be incorporated into the regulatory text;
- .2 with regard to the second footnote ("INFCIRC/225/Rev.4 (Corrected), IAEA, Vienna (1999).") in 1.4.3.2.3, it should be considered whether the text should be incorporated into the regulatory text;
- .3 in 2.4.5, it should be considered whether the first footnote (If applicable and testing is relevant, taking into account reactivity properties, class 6.1 and class 8 properties shall be considered according to the precedence of hazards table 2.0.3.6) should be regulatory in nature and should be incorporated into the regulatory text;
- .4 with regard to the footnote texts (Distinguishing sign of the State of registration used on motor vehicles and trailers in international road traffic, e.g. in accordance with the Geneva Convention on Road Traffic of 1949 or the Vienna Convention on Road Traffic of 1968) in 5.4.1.5.9.2, 5.4.1.5.15, 6.1.3.8 (h), 6.2.2.7.2 (c), 6.2.2.7.4 (n), 6.2.2.7.7 (a), 6.2.2.9.2 (c), 6.2.2.9.4 (a), 6.3.4.2 (e), 6.4.23.11 (a), 6.5.2.1.1.5, 6.6.3.1 (e), 6.7.2.18.1, 6.7.3.14.1, 6.7.4.13.1, 6.7.5.11.1 and 6.9.5.5.1 (e), it should be considered whether it would be advisable to create a definition for a distinguishing sign used on vehicles in international road traffic;
- .5 with regard to 5.4.1.6.1 of the UN Model Regulations and the corresponding footnote, it should be considered whether amending the provisions in 5.4.1.6.1 to be more generic (such as replacing "above" with "herein" and deleting the associated footnote) would be appropriate;
- .6 with regard to footnote in 6.2.4.3 (c), it should be considered whether the footnote text should be incorporated into the regulatory text;
- .7 with regard to the first footnote text in 6.7.2.20.1 (The unit used shall be indicated), it should be considered whether it should be incorporated into the regulatory text;

.8 with regard to footnote text in 6.7.3.8.1.1, it should be considered whether it should be incorporated into the regulatory text;

.9 with regard to footnotes in 6.7.3.16.1, it should be considered whether the footnote text should be incorporated into the regulatory text;

.10 with regard to footnotes in 6.7.4.15.1, it should be considered whether the footnote text should be incorporated into the regulatory text;

.11 with regard to footnotes in 6.7.5.13.1, it should be considered whether the footnote text should be incorporated into the regulatory text; and

.12 with regard to the footnote text in 7.3.7.2.3.2, it should be considered whether this could be deleted, taking into account the definition for SAPT in 1.2.1.

3.18 In addition, the Group requested the Secretariat to inform IAEA on the following relevant matters:

.1 with regard to the first footnote (INFCIRC/274/Rev.1, IAEA, Vienna (1980)) in 1.4.3.2.3, it should be considered if updating the reference to the latest version is appropriate and also whether it should be incorporated into the regulatory text; and

.2 with regard to the second footnote (INFCIRC/225/Rev.5, IAEA, Vienna (2011)) in 1.4.3.2.3, it should be considered whether the text could be incorporated into the regulatory text.

Assignment of 2,4-Dichlorophenol in the index of the IMDG Code

3.28 The Group considered document CCC 6/6/12 (Germany), proposing a new allocation of 2,4-Dichlorophenol to UN 2923 in the index of the IMDG Code due to current classification according to which the substance not only has toxic, but also corrosive properties.

3.29 In this context, the delegation of Germany informed the Group that Germany intends to submit a corresponding proposal to UNSCETDG.
