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**COMMITTEE OF EXPERTS ON THE TRANSPORT  
OF DANGEROUS GOODS**

**Sub-Committee of Experts on the  
Transport of Dangerous Goods**  
(Eighteenth session, 3-14 July 2000,  
agenda item 5 (c))

**MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS  
ON THE TRANSPORT OF DANGEROUS GOODS**

**Limited quantities**

**Transmitted by the expert from Australia**

**Introduction**

At the 17th session of the Sub-Committee in December 1999, Australia proposed in ST/SG/AC.10/C3/1999/56 amendments to Chapter 3.4 and Chapter 5.3 to achieve:

- Placarding of transport units containing dangerous goods being transported as Limited Quantities
- Increased hazard communication elements in outer packaging marking for Limited Quantity shipments
- Documentation for all Limited Quantity shipments

with exemptions from these requirements if the consignment contained less than 2,000kg/l of dangerous goods packaged as Limited Quantities. In doing this, no exception was made for dangerous goods bound for the retail market, as Australia has always argued that the market destination is irrelevant to the hazards posed by the dangerous goods.

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Australia continues to believe that Chapter 3.4 has major problems including

- The terminology ‘Limited Quantities’ which we believe is misleading, as this Chapter is concerned with small packaging sizes in unlimited quantities;
- A confusion with regard to what marking and labelling requirements should be for Limited Quantities and for dangerous goods destined for the retail sector;
- The exemption from all dangerous goods requirements for goods destined for the retail market, particularly the lack of documentation.

Australia believes that this Chapter needs major work and foreshadows further proposals but at this stage would like to address only the issue of transport unit placarding for large consignments of Limited Quantities.

### **Transport Unit Placarding**

Comments received during December 1999 Sub-Committee and discussions held since with other experts have encouraged Australia to return with a simple proposal to achieve placarding of Limited Quantity consignments in the Model Regulations. The proposal ensures that the principle of transport unit placarding, embedded in the Model Regulations, can be applied to Limited Quantity consignments above a certain ‘maximum consignment quantity’.

Australia does not propose the nature of the transport unit placard, leaving that to other delegations. However, the Sub-Committee is reminded that placards are required to indicate the primary hazard of the goods contained within a transport unit and this principle needs to be recalled if debate ensues about what the harmonised placard should comprise.

### **Justification**

In December 1999, Australia alerted the Sub-Committee to an anomaly in Chapter 3.4, which allows industry to ship large quantities of dangerous goods in small packages under relaxed labelling, segregation and packaging requirements. Furthermore, if the dangerous goods are destined for the retail market, as is the case for most Limited Quantity shipments, they can travel virtually unidentified with no placarding, no documentation and no package markings required.

### **Land Mode Shipments**

Australia experiences about three major land transport vehicle incidents per year involving dangerous goods bound for the retail market and numerous small incidents involving other dangerous goods in Limited Quantity sizes. The fact that incident numbers are low does not mean that small packagings should travel unregulated. The emergency services and other people in the transport chain, are entitled to know what the hazards of all dangerous goods consignments are so that they can manage incidents appropriately without injury to personnel and with minimal confusion and transport disruption.

With the increase in the number of road tunnels and private tollways in Australia, concern is being expressed about the increased likelihood of fires and about the difficulty in policing dangerous goods loads with no transport unit placard. It is difficult to enforce land route controls, such as through road tunnels and on tollways and freeways, without placards indicating the hazards of the load being carried.

## **Maritime Shipments**

For maritime transport, Section 18 of the IMDG Code provides for the words "LIMITED QUANTITIES" to be marked on the outside of transport units. This gives no indication of the hazard of the shipment. For Limited Quantities destined for the retail market, there is an exemption from marking (but not documentation), which differs from 3.4.9 of the UN Recommendations. It is possible to ship an unlimited amount of goods packed in limited quantity sizes. This issue was raised at a recent IMO meeting where it was queried whether 'maximum consignment quantities' should be established for goods consigned as Limited Quantities. For the maritime mode, there is often no possibility of assistance from emergency services, and the need for information for the crew about the hazards posed by the consignment is undeniable.

## **Air Mode**

For the air mode, transport unit placarding does not apply. However, documentation is required for all consignments irrespective of whether they are being shipped as dangerous goods in Limited Quantities or as Consumer Commodities. The nature of the hazard and total mass of dangerous goods in the shipment is thus always known for the air mode.

## **The Proposed 'Maximum Consignment Quantity'**

Australia believes that 2,000L/kg gross is a reasonable maximum consignment quantity of goods consigned as Limited Quantities that can be shipped without a placard for the land and maritime modes, as argued in ST/SG/AC.10/C3/1999/56. Given the restricted range of goods allowed to be shipped under Chapter 3.4, we believe this is a reasonable level under which many consignments can be made. Above this level, consignments must be placarded. A single 'maximum consignment quantity' should be agreed, rather than attempting to agree upon different levels for different packing groups or classes of dangerous goods.

## **Proposal**

### **Chapter 5.3**

**Aim:** to require placards on transport units for all Limited Quantity consignments greater than a maximum consignment quantity of 2,000L/kg

Amend 5.3.1.1.2 to read:

"Placards shall be affixed to the exterior surface of transport units to provide a warning that the contents of the unit are dangerous goods and present risks. Placards shall correspond to the primary risk of the goods contained in the transport unit except that:

- (a) Placards are not required on transport units carrying any quantity of explosives of Division 1.4, Compatibility Group S, dangerous goods packed in limited quantities *where the maximum*

*consignment quantity of dangerous goods does not exceed 2,000 L/kg gross, or excepted packages of radioactive material (Class 7); and.....”*

### **Chapter 3.4**

Aim: to ensure that the placarding thus required above the maximum consignment quantity for Limited Quantity shipments applies also to consignments of retail dangerous goods

Amend 3.4.9 to read:

“Limited quantities of dangerous goods for personal or household use, that are packaged and distributed in a form intended or suitable for sale through retail agencies, may furthermore be exempted from marking of the proper shipping name and the UN Number on the packaging and from the requirements for a dangerous goods transport document, *provided that the maximum consignment quantity of dangerous goods on the transport unit does not exceed 2,000L/kg gross.*”

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