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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Sub-Committee of Experts on the Transport of Dangerous Goods

(Twenty-first session, 1-10 July 2002,
agenda item 10)

MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Consumer commodities

Transmitted by the experts from the United States of America, the United Kingdom and Canada

1. The experts from the United States, Canada and the United Kingdom have jointly developed amendments to the UK proposal in ST/SG/AC.10/C.3/2002/32 that proposes requirements for consumer commodities. We believe that adoption of the proposed consumer commodity requirements in the Model Regulations will result in improved harmonization of requirements applicable to the transport of consumer commodities by all modes of transport and will enhance safety while minimizing undue burdens on the users of international, modal and national regulations.

2. While we generally support the initial proposals in ST/SG/AC.10/C.3/2002/32 there are some issues that need to be considered further. It is requested that the following comments be considered by the Sub-Committee:

- a. There is a typographical error in that the word "Ready" appears in the proper shipping name. This should be deleted.
- b. Change the title of Column 7 in the Dangerous Goods List to "Limited quantities and Consumer commodities" if the limited quantity thresholds are adopted (see paragraph (f)).
- c. Change the title of Chapter 3.4 to "LIMITED QUANTITIES AND CONSUMER COMMODITIES"
- d. Add: "3.4.1 Limited Quantities" and re-number the following sections noting that some new sections have been added – paragraphing of existing sections. We have attached a proposed revision of Chapter 3.4 in its entirety for ease of review.
- e. The authors of this paper could not agree on whether the inner packaging quantity limits specified for consumer commodities should be those specified for limited quantities in column 7 of the Dangerous Goods List or 500 g and 500 ml limits as proposed in ST/SG/AC.10/C.3/2002/32. The UK in particular believes that the inner packaging limit for consumer commodities should be 500 ml or 500 g when transported under consumer commodity exceptions to clearly differentiate between limited quantity and consumer commodity exceptions. Currently the IMDG Code and some national regulations authorize dangerous goods to be transported under the consumer commodity provisions if the inner packaging quantities do not exceed those specified for limited quantities. The Sub-Committee is requested to consider this matter.
- f. Pending the outcome of the discussion of the consumer commodity marking provisions, the Sub-Committee should consider adding the following sentence to the end of new 3.4.10: "The mark shall be applied on at least one side or end of the outer packaging and conform to the provisions of paragraphs 5.2.1.2 (a) to (d)." so that there will be consistency in how the packaging marks are applied for limited quantities and consumer commodities.
- g. Add new paragraphs to address consumer commodity provisions in Chapter 3.4 as follows:

3.4.11 Consumer Commodities

3.4.11.1 Consumer commodities are dangerous goods intended or suitable for personal, recreational or household use including drugs, medicines and other items administered or sold to or for humans or animals by doctors, medical administrations, veterinary practitioners, pharmacies or retail sales distributors.

3.4.11.2 Dangerous goods transported as consumer commodities shall be in compliance with [3.4.3 to 3.4.7]. *Depending on the decision regarding inner packaging quantities this may need to read "3.4.4 to 3.4.7]*

3.4.11.3 The applicable quantity limit for the inner packaging or article [is specified for each substance in Column 7 of the Dangerous Goods List in Chapter 3.2. The word "NONE" in Column 7 indicates that the substances shall not be transported as a consumer commodity **OR** shall not exceed 500 g/500ml except when the word "NONE" is indicated in column 7.

Note: The quantity limits should be included once the limits have been discussed by the Sub-Committee and a decision is taken.

3.4.11.4 A transport document is not required for dangerous goods transported as Consumer Commodities.

3.4.11.5 Packages containing consumer commodities shall bear the UN number "4000", preceded by the letters "UN", placed within a diamond. The width of the line forming the diamond shall be at least 2 mm and the UN number shall be at least 6 mm high. The mark shall be applied on at least one side or end of the outer packaging and conform to the provisions of paragraphs 5.2.1.2 (a) to (d).

Note: No new special provision or packing instruction as proposed in ST/SG/AC.10/C.3/2002/32 is required. The entry in Chapter 3.2 would be as follows:

UN No.	Name and Description	Class	Sub-risk	PG	Special Provisions	Limited quantities and Consumer commodities
4000	CONSUMER COMMODITY [containing small quantities of dangerous goods]	9				See Chapter 3.4

Annex 1

Proposed Revision to Chapter 3.4

CHAPTER 3.4

LIMITED QUANTITIES AND CONSUMER COMMODITIES

3.4.1 *Limited Quantities*

3.4.2 Limited quantities are dangerous goods offered for transport and transported in accordance with the applicable provisions in this Chapter. All provisions and requirements of these Regulations apply to the transport of limited quantities except as specifically provided in this Chapter.

3.4.3 The quantity limits for the inner packaging or article is specified for each substance in Column 7 of the Dangerous Goods List in Chapter 3.2. In addition, the word "None" in Column 7 indicates that the substance shall not be transported as a limited quantity.

3.4.4 Dangerous goods shall be packed in inner packagings placed in suitable outer packagings. However, the use of inner packagings is not necessary for the transport of articles such as aerosols or "receptacles, small, containing gas". The packagings shall meet the provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8 and be designed so that they meet the construction requirements of 6.1.4. The total gross mass of the package shall not exceed 30 kg.

3.4.5 Shrink-wrapped or stretch-wrapped trays in compliance with 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8 are acceptable as outer packagings, except that inner packagings that are liable to break or be easily punctured such as those made of glass, porcelain, stoneware or certain plastic materials, etc., shall not be transported in such outer packagings. The total gross mass of the package shall not exceed 20 kg.

3.4.6 Liquids included in Class 8, Packing Group II, and contained in glass, porcelain or stoneware inner packagings shall be enclosed in a compatible and rigid intermediate packaging.

3.4.7 Different dangerous goods transported as limited quantities may be placed in the same outer packaging provided they will not interact dangerously in the event of leakage.

3.4.8 Segregation provisions for dangerous goods need not apply within a vehicle or freight container.

3.4.9 In addition to the provisions for documentation specified in 5.4.1, the words "limited quantity" or "LTD QTY" shall be included on a transport document with the description of the consignment (see 5.4.1.5.2).

3.4.10 Packages containing limited quantities need not bear a label or the proper shipping name of the substance, but shall be marked with the UN number of the substance, preceded by the letters "UN", placed within a diamond. The width of the line forming the diamond shall be at least 2 mm and the UN number shall be at least 6 mm high. When more than one substance is included in the package and the substances are assigned to different UN numbers, the diamond shall be large enough to include each relevant UN number. [The mark shall be applied on at least one side or end of the outer packaging and conform to the provisions of paragraphs 5.2.1.2 (a) to (d).]

3.4.11 *Consumer Commodities*

3.4.11.1 Consumer commodities are dangerous goods intended or suitable for personal, recreational or household use including drugs, medicines and other items administered or sold to or for humans or animals by doctors, medical administrations, veterinary practitioners, pharmacies or retail sales distributors.

3.4.11.2 Dangerous goods transported as consumer commodities shall be in compliance with 3.4.4 to 3.4.8.

3.4.11.3 The quantity limit for the inner packaging or article is specified for each substance [in Column 7 of the Dangerous Goods List in Chapter 3.2. The word "NONE" in Column 7 indicates that the substances shall not be transported as a consumer commodity **OR** 500 g/500ml except when the word "NONE appears in Column 7 of the Dangerous Goods List]

Note: The quantity limits should be included once the limits have been by the Sub-Committee and a decision is taken.

3.4.11.4 A transport document is not required for dangerous goods transported under this entry.

3.4.11.5 Packages containing consumer commodities shall bear the UN number "4000", preceded by the letters "UN", placed within a diamond. The width of the line forming the diamond shall be at least 2 mm and the UN number shall be at least 6 mm high. The mark shall be applied on at least one side or end of the outer packaging and conform to the provisions of paragraphs 5.2.1.2 (a) to (d).
