

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

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DANGEROUS GOODS IN LIMITED QUANTITIES

Comments and/or reaction on ST/SG/AC.10/C.3/2004/44 and ST/SG/AC.10/C.3/2004/50.

Transmitted by the expert from the Netherlands

Introduction

1. By this document the expert from the Netherlands want to express their comments and reaction on document ST/SG/AC.10/C.3/2004/44 of the experts from Canada and France and document ST/SG/AC.10/C.3/2004/50 of the expert from Belgium with regard to the proposed alternative proposals concerning requirements for DANGEROUS GOODS PACKED IN SMALL QUANTITIES.

General view of the Netherlands

2. Dangerous goods, including dangerous goods packed in small quantities, should always be recognizable as such during transport (see also Chapter 5 of ST/SG/AC.10/C.3/2002/47).

Therefore the main objective in this work should be to achieve an acceptable safety level for the safe **multimodal** transport of dangerous goods packed in small quantities and to maintain all necessary information for all parties concerned in the multimodal transport chain.

3. The focus in this work should be on a **multimodal** harmonization as mentioned in the terms of reference for the working group (see attachment 1 of UN/SCETDG/23/INF.30) and how that this harmonization can be achieved. However some mode specific differences may be introduced, e.g. for distribution transport in the inland-mode, if such a transport is not a part of the multimodal transport chain.

Specific reaction/comments

Reaction on ST/SG/AC.10/C.3/2004/50

4. The Netherlands can agree with the views expressed by the expert of Belgium respect to:

- the given two options in ST/SG/AC.10/C.3/2004/44 are not the only possible options – *pending the decision on the (final) basic principles, more options are possible;*
- the differentiation between dangerous goods packed in small quantities and consumer commodities/“not suitable for sale” versus “suitable for sale” cannot be made – *from a multimodal perspective the introduction of Consumer Commodities (CC) have no added-value. CC-products have no different properties and already comply with the current provisions for dangerous goods packed in small quantities;* and,

- the introduction of a “UN 8000” entry in either of the options is not acceptable – ‘UN 8000’ only indicates that dangerous goods in small quantities are present. This information alone is felt insufficient for a safe transport as for emergency purposes;

Comments on ST/SG/AC.10/C.3/2004/44

5. Both options given in document ST/SG/AC.10/C.3/2004/44 can in general not be supported by the Netherlands.

6. Although not formally proposed the Netherlands is not in favour of the introduction of an EXCEPTED QUANTITIES (EQ) system. There is, in the view of the Netherlands, no added-value for the introduction of multimodal EQ-provisions. The current (mode-specific) EQ-provisions in ICAO are not based upon a safety-rational, but based upon economic arguments. Moreover the current used ‘rational’ in ICAO differs fundamental from the current Limited Quantities–rational used in the UN (e.g. PG I substances are allowed in the ICAO EQ-provisions).

Dutch view on the basic principles to be used

7. An acceptable safety level for the multimodal transport of dangerous goods in small quantities can be achieved by the following principles:

- *application*: in principle all provisions of Chapters 1 – 6 of the Model regulations apply, except as specifically provided otherwise;
- *packagings*; relaxation can be given with regard to requirements for the use and construction and testing for the packaging (e.g. see 3.4.2 and 3.4.3);
- *documentation*; all information as specified in 5.4.1 and the words “**dangerous goods packed in small quantities**” to be added;
- *marking of the packaging*; the hazard(s) should be indicated on the packaging ⇒ to be marked with the UN Number(s) and the applicable danger class label and, if applicable, a subsidiary risk label – *the hazard label may be adapted for the purpose to indicate that the package contains dangerous goods packed in small quantities*;
- *marking of the transport unit*; the primary hazard should be indicated on the transport unit ⇒ to be placarded with the applicable danger class placard and, if applicable, a subsidiary risk placard - *the hazard placard may be adapted for the purpose to indicate that the package contains dangerous goods packed in small quantities*;
- *limit for marking the transport unit*; as dangerous goods packed in small quantities do not significantly behave different in an accident situation, for safety reasons, no limit should be introduced.

8. If the above mentioned basic principles can be agreed upon, this can be achieved by amending 3.4.1, 3.4.6, 3.4.7, 3.4.8. and 3.4.9 of the current Chapter 3.4.

Action requested of the Sub-Committee:

9. The Sub-Committee is invited to consider the views of the Netherlands given in this document and take action as deemed appropriate.
