

## 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-fifth session  
Geneva, 5-14 July 2004  
Item 7 of the provisional agenda

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

Information required on the dangerous goods transport document 5.4.1.5.1  
Total quantity of dangerous goods (comments on ST/SG/AC.10/C.3/2004/3 (Austria))

Transmitted by the European Industrial Gases Association (EIGA)

#### **Introduction**

Austria has proposed in ST/SG/AC.10/C.3/2004/3 to amend the requirement of 5.4.1.5.1 to clarify that the total quantity of dangerous goods shall be indicated according to all the particulars of the description of the dangerous goods as defined in 5.4.1.4. More specifically, to indicate the totals not only per each combination of UN number, Proper Shipping Name and packing group (when applicable) as is presently required but to each combination of UN number, PSN, PG and Technical Name.

This new requirement has tremendous consequences for the transport documents in the case of shipments of dangerous goods mixtures under N.O.S. positions, which is the case of the Industrial Gases Industry that manufactures and ships a large variety of mixtures of the gases of Class 2.

When Class 2 was fundamentally reviewed in the early nineties, the issue was recognized and many UN numbers were created to cover the 21 N.O.S. positions that corresponds to the hazards combinations (flammable, oxidizing, toxic, corrosive....) accepted in the three transport conditions (compressed, liquefied and refrigerated).

In the case of mixtures, the technical name is the components that are identified in the parenthesis after the PSN. EIGA is of the opinion that the present requirements for the totals per UN number/PSN and PG (when appropriate) to be indicated on the transport document give sufficient information to the emergency services with regard to the quantities of dangerous goods that are on board per type of hazard.

Splitting these totals in sub-totals according to the different combinations of technical names will make the preparation of the transport much more complicated without increasing the level of safety of the shipments. This extra burden will be particularly evident when dealing with packaged goods.

**Proposal**

EIGA proposes not to adopt the proposal from Austria.

**Justification**

The additional requirement will make the issuing of transport document more complicated without increasing the level of safety.

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