

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 PACKED IN LIMITED QUANTITIES

Transmitted by the International Union of Railways (UIC/IUR)

Reference is made to the Canadian/French proposal ST/SG/AC.10/C.3/2004/44 and the comments by the expert from Belgium ST/SG/AC.10/C.3/2004/50.

The UIC/IUR can agree with most of the comments by the expert from Belgium. We should like to point out again our main problem with the proposals from the working group, i.e. the following question:

WHY HAS THE INFORMATION ABOUT THE NATURE AND THE HAZARDS OF DANGEROUS GOODS SHIPPED IN SMALL QUANTITIES TO BE KEPT SECRET BY ALL MEANS?

Is this because of tradition in some modes of transport or in certain countries?

According to legislation for safety at work or consumer safety all over the world, information about the hazards of the products has to be indicated on the inner packaging of dangerous goods shipped in small quantities. No useful information is however proposed by the working group for indications on the outer packaging or the transport unit.

That is to say, workers in the transport industry and emergency responders, confronted with leakages and other accidents with shipments of dangerous goods packed in small quantities, have to open the transport unit and the package, to find relevant hazard information on the leaking substance.

According to the proposal no useful information is to be found in the transport documentation either.

We fail to understand, why it is so difficult to use in the documentation for the transport of small quantities of dangerous goods the description according to 5.4.1.4.1, e.g.:

UN 1263 PAINT 3, III, instead of
UN 8000 DANGEROUS GOODS PACKED IN SMALL QUANTITIES.

We furthermore want to point out, that the use of the shipping name 'Dangerous goods packed in small quantities' only, is not allowed according to international conventions and agreements for the railway transport of goods and for customs purposes. In the cases, where an individual proper shipping name, according to UN, is not indicated in the documentation, the Harmonised Commodity Name, according to the Customs Cooperation Council, shall be used, however without indication of UN-nr., class or PG.

In RID/ADR we have at present the situation, that no indication at all is prescribed in the case of shipments of dangerous goods in limited quantities. In the transport document, however, the goods are indicated with their shipping name according to the Harmonised Commodity Name system. This situation leads to unacceptable confusion, if the Harmonised Commodity Name is similar to the Proper Shipping Name according to UN, because it is impossible to decide if it is a limited quantity shipment or a normal dangerous goods shipment with an incomplete dangerous goods description.

The UIC/IUR therefore would be very grateful, if the Sub-Committee could take a decision where the differences in regard to labelling, placarding, marking and information in the documentation between shipments of dangerous goods in small quantities and normal shipments would be eliminated, or kept as small as possible.
