

**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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TRANSPORT OF GASES

Comments on ST/SG/AC.10/C.3/2004/65 (United States of America)

Transmitted by the expert from Belgium

The Government of Belgium has the following comments on the proposals contained in document ST/SG/AC.10/C.3/2004/65 of the expert from the United States of America:

1. It agrees with the revision of the headings of Table 1, as proposed in point 2. a. of the document. The proposed note b however (“*Where maximum working pressures are indicated in the table these values shall not be exceeded*”) will not serve its purpose because it is self-evident and brings no clarification.

The following text is therefore proposed for this note b : “*This gas is known to be violently reactive at pressures higher than the maximum working pressure indicated.*”.

2. It has no difficulties with the principle of proposal 2.e. but wonders whether this new special provision is really necessary after all these years, taking account of the fact that this pesticide will no longer be used in the very near future.
3. It does not understand the point of view of the expert from the United States of America, expressed in 2. f. In paragraph (3) of P200, points (a), (b) and (c) do contain provisions enabling the calculation of the test pressure [e.g. in (c) : “The test pressure of the pressure receptacle shall be at least equal to the vapour pressure (absolute) of the liquid at 65°C, minus 100 kPa (1 bar)].
4. It agrees with adding “Type _____” in 6.7.5.13.1, as proposed in 3.a. However, the example given raises questions instead of solving them. The meaning of “AE/UE” is a mystery to us. Paragraph 6.7.5.13.1 ought to explain exactly how the type of periodic tests are to be indicated (specifying the abbreviations to be used, for example, as has been done in 6.2.2.7.2).
5. It does not share the concerns expressed by the expert from the United States of America in 3. c. The working pressure already has to be indicated, on the basis of 6.7.5.13.2.

The proposed additional text should be regulatory text, not a note ; as it concerns the users, its proper place would be in Part 4 instead of 6.

6. It does not agree with the grouping together of 6.7.5.13.1 and 6.7.5.13.2 into a single paragraph, as proposed in 3. c. The markings of 6.7.5.13.1 and 6.7.5.13.2 are meant to be put in different places and can be inscribed by different means (the ones of 6.7.5.13.1 only by stamping or a similar method, the others not necessarily so).

If the word “expert” is to be indicated instead of “authorized body”, the same change of terminology has to be introduced in 6.7.5.12.7. Otherwise the difference in wording could lead to confusion.

If two new markings are to be introduced, proper transitional measures should be introduced to take care of the already existing MEGCs.

7. It is of the opinion that the new wording of 6.2.2.5.3.1 as proposed in 4. a. (1) is not entirely correct. The words “with regard to design and product quality” in the present 6.2.2.5.3.1 (a) apply only to the power of the management (the word “responsibilities” is followed by a “,”). The description of the organisational structure and responsibilities is not to be limited to design and product quality.

It is therefore proposed to leave the text of (a) as it is, or to amend it to read “The organisational structure, and the responsibilities of the personnel.”

8. It notes that the new text of 6.2.2.5.4.9, as proposed in 4. b., no longer contains the two paragraphs that at the present follow (e), without any apparent reason.

It is proposed to add, after the amended text of 6.2.2.5.4.9, the two last paragraphs of the present 6.2.2.5.4.9.
