

## 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  
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Item 5 of the provisional agenda

### DANGEROUS GOODS PACKED IN LIMITED QUANTITIES

#### Results of a Poll of the Dangerous Goods Panel

#### Transmitted by the International Civil Aviation Organization (ICAO)

1. The ICAO Dangerous Goods Panel (DGP) was requested to consider the proposals to the Transport of Dangerous Goods Sub-Committee (TDG SC) concerning limited quantities and consumer commodities in light of the implications to the safe transport of dangerous goods by air. The DGP approached the UN TDG SC requesting that a UN number be allocated for "Consumer Commodity, UN 8000" but this request is yet to be fulfilled. The DGP requests that the TDG Sub-Committee adopt an entry for consumer commodities, UN 8000 for use in the air mode and for transport by other modes since there is a need to ensure transport to and from the airport.
2. The ICAO DGP was recently requested to respond to a series of questions regarding the requirements for limited quantities and consumer commodities in order to establish ICAO's position on a number of issues. The questions and responses are provided below. Where there was not complete agreement some of the specific comments received have also been indicated. The TDG SC is requested to take the views of the Panel into account in discussions and decisions concerning the requirements for limited quantities and consumer commodities.

#### *ICAO DGP Position regarding the Canada/France Proposal Concerning Limited Quantities*

**Question # 1: Does the Panel favor maintaining a distinction between Consumer Commodities and Limited Quantities?**

**Answer: Yes**

**Question # 2: Does the Panel favor maintaining the requirement for a transport document (shipper's declaration) for shipments of Limited Quantities and Consumer Commodities?**

**Answer: Yes**

**Question # 3: Does the Panel wish to consider allowing the UN number/diamond marking as an alternative to requiring the Class labels on packages of limited quantities transported by air?**

**Answer: No**

**Question # 4: If it were adopted by the UN, would the panel consider allowing the UN 8000 diamond marking in lieu of the Class 9 hazard label currently required for consumer commodities? Although the answer to question 3 above is assumed to be "no", the Class 9 label is so generic that it may be feasible to allow the UN 8000 marking to substitute for the Class 9 label.**

**Answer: Maybe, more research required.**

**Individual Comments:**

(IATA) 'The substitution of a diamond marking with UN 8000 in lieu of a Class 9 hazard label for consumer commodities may be considered. However, there is concern at the proliferation of "diamond markings". The recent diamond marking for UN 3373 is a case in point. Training for warehouse and ramp staff particularly will have to emphasize that packages with this mark are not dangerous goods in the normal scheme of events. Introducing a different diamond shaped hazard marking that is DG and has to be treated differently will pose a challenge in training as there has been a long-held position that diamond shaped labels represent DG hazard labels.'

(U.K.) 'As I indicated at 1 above, the Class 9 label provides no information other than the presence of dangerous goods and the marking as proposed would be just as ineffective. Ideally, I believe a package of dangerous goods should be labelled as what they are eg flammable or toxic or whatever but in the absence of this I believe the Class 9 label is marginally better than the proposed marking. However, this might be one area where we could maybe give a little; if it meant excepted quantities were accepted by the other modes then I would probably accept the marking!'

(IFALPA) 'The Class 9 label gives better hazard communication than the diamond marking.'

(Canada) 'The initial philosophy of the UN Committee of Experts on the Transport of Dangerous Goods to make the tools used to communicate the hazard as easy to understand as possible was sound. Inventing a new label displaying one or more UN numbers does not do this. The hazard class label provides for the consistent application of the original philosophy and facilitates the training and ultimate handling (segregation) of these dangerous goods. The addition of the term 'Small Quantities' identifies these goods as being subject to special provisions.'

(USA) This is an issue that should be considered further in order to enhance harmonization.

(Japan) We need more time to consider.

**Question # 5: If the UN designates a UN number for consumer commodities, does the Panel favor adoption by the UN of a distinct UN number for consumer commodities transported by air? For example, UN8000 could be assigned to Consumer Commodities acceptable for air transport and UN8001 for Consumer Commodities not acceptable for air but acceptable for other modes.**

**Answer: Majority indicate yes**

**Individual Comment:**

(Australia) 'If there are to be differences, this seems logical. Personal preference would be to have a different shipping name as well as different UN number if there are to be differences, but not firm either way.'

(IATA) 'If the UN proposes different provisions for "consumer commodities" for surface modes then yes a different UN number for air-mode consumer commodities should be considered. However, it would be better for all concerned if a single standard could be developed to remove any chance of confusion.'

(U.S.) 'It would preclude consumer commodities that do not meet SP 112, PI 910 and other air transport specific requirements from inadvertently being accepted for air transport. I fully support this approach.'

(U.K.) 'At first glance it would appear to be worth investigating, providing we were happy there was no potential for mis-classification.'

(IFALPA) 'If it makes a clear distinction between yes or no acceptable for airtransport; there might be a benefit here.'

(Japan) We agree that a distinct UN number for consumer commodities transported by air should be adopted.

**Question # 6: Does the Panel favor the change of the name "limited quantities" to "dangerous goods packed in small quantities"?**

**Answer: Conditional no**

**Individual Comments:**

(Australia) 'I'm not totally opposed to change in this area, but need to be convinced of the need to change. The alternative given here is too wordy and, in my view, tells us very little. After all, some explosives are shipped in comparatively small quantities, but they pack a big punch! I believe the "note" preceding the LQ info in the TI in Part 3;4 conveys the necessary info. Should ICAO have LQ provisions for items the UN does not, rationalisation should be undertaken.'

(IATA) 'The term "dangerous goods packed in small quantities" is cumbersome and doesn't provide any indication of what it really means. For the air-mode the provisions are not just about the quantity of dangerous goods, but the rather the packaging standard. "Dangerous goods packed in small quantities" is more akin to the Excepted quantity provisions.'

(U.S.) 'Once the UN amends the limited quantity and consumer commodity requirement, I think the Panel should review the requirements of the TI to see if any changes could be made to avoid confusion. However, I do not support using the proposal to change "limited quantities" to dangerous goods packed in small quantities" in the Model Regulations.'

(Canada) 'Using the term 'limited quantities' may create confusion if there is a difference between the new requirements and the old requirements. The term 'dangerous goods in small quantities' is somewhat cumbersome. However, if the hazard class label is used it would permit the adoption of a new, shorter description: 'Small Quantities'.'

(Japan) No change of the name is necessary.

**Question # 7: Does the Panel favor changing the inner packaging limits for consumer commodities in P910 or limited quantities currently in the Y packing instructions?**

**Answer: No**

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