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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OUTSTANDING ISSUES OR PROPOSALS OF AMEMDMENTS TO THE TRANSPORT OF DANGEROUS GOODS

Miscellaneous proposals

Definitions

Definition of Transport Units and Closed Transport Units

Transmitted by the expert from Australia

SCOPE

This proposal aims to recommend a definition of "Transport Unit" and "Closed Transport Unit" be incorporated into section 1.2.1.

RELATED DOCUMENTS

UN/SCETDG/23/INF.23 - (Australia) Approval of Intermediate Bulk Containers. UN/ST/SG/AC.10/C.3/2003/56 - (Australia) Approval of Intermediate Bulk Containers.

Introduction

1. It is noted that while the Model regulations do not define a 'Transport Unit' or 'Closed Transport Unit' within section 1.2.1 this term is used thought the UN Model regulations (for example special packing provisions PP1, B1 and B2, Chapter 5.3 and sections 4.1.2.3, 7.1.1.3 and 7.1.1.5). The term 'Transport Unit' is provided in section 5.3.1.1.1 but this term is used in other parts of the model regulations as noted above. This definition is the same as that used for a 'Cargo Transport Unit' in section 1.2.1 of the IMDG code.

Proposal

2. As a minimum it is recommended the definition of 'Transport Unit', as given in section 5.3.1.1.1, be included in section 1.2.1 along with a definition for a 'Closed Transport Unit'. It is recommended that the definition of 'Closed Transport Unit' be a modified version of 'Closed Cargo Transport Unit' contained in section 1.2.1 of the IMDG code. For example:

Closed Transport Unit; means a transport unit which totally encloses the contents by permanent structures. *Transport Units with fabric sides or tops are not closed transport units.*

3. To promote inter-modal consistency it is suggested that consideration be given to using the term 'Cargo Transport Unit' in lieu of 'Transport Unit'. This would avoid confusion between the acronym CTU used in conjunction with the IMDG code to describe a 'Cargo Transport Unit' compared to the term "Closed Transport Unit' as given in special packing provisions PP1, B1 and B2. Within the IMDG code this is a 'Closed Cargo Transport Unit'.