

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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Item 5 of the provisional agenda

LIMITED QUANTITIES

Exempted quantities

Comments on ST/SG/AC.10/C.3/2005/17 (United Kingdom)

Transmitted by the International Council of Chemical Associations (ICCA)

Summary

The United Kingdom is proposing the adoption of text on Exempted Quantities. The aim of this document is to amend Table 3.4.2.1 listing the Quantities per Inner and per Outer. The Quantities per Inner are not compatible with the Quantities per Outer. We therefore propose to amend the Inner-Quantities to make them user-friendly.

Proposal

We propose to amend Table 3.4.2.1 in said document as follows:

Table 3.4.2.1

CLASS/ DIVISION	Packing Group I		Packing Group II		Packing Group III	
	Packagings		Packagings		Packagings	
	Inner	Outer	Inner	Outer	Inner	Outer
2.2	Inner packagings 50ml Outer packagings 1L					
3	50mL	300mL	50mL	500mL	50mL	1L
4.1 ¹	Transport prohibited		50g	500g	50g	1kg
4.2 ²	Transport prohibited		50g	500g	50g	1kg
4.3	Transport prohibited		50g or 50mL	500g or 500mL	50g or 50mL	1kg or 1L
5.1	Transport prohibited		50g or 50mL	500g or 500mL	50g or 50mL	1kg or 1L
5.2	Inner 50ml or 50g/Outer 500g or 500ml ONLY WHEN CONTAINED IN A CHEMICAL KIT OR FIRST AID KIT					
6.1	Inner 1g or 1ml/Outer 250g or 250ml ³		1g or 1mL	500g or 500mL	50g or 50mL	1kg or 1L
8	Transport prohibited		50g or 50mL	500g or 500mL	50g or 50mL	1kg or 1L
9	N/A		50g or 50mL	500g or 500mL	50g or 50mL	1kg or 1L

The Quantity per Inner shall be increased from 30 mL / g to 50 mL/g (except for Div. 6.1, PG II).

Justification

- 30 mL or 30 g are not compatible with 500 mL or g. An outer of 500 g could contain – mathematically - 16.66 inners of 30 g each. This doesn't make sense.
 - A buyer of 100 mL/g of a product would prefer receiving two inners of 50 mL/g rather than 3 of 30 and 1 of 10 mL/g.
 - An inner-quantity of 50 mL/g would be easier to enforce.
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