

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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Comments on paper ST/SG/AC.10/C.3/2006/8 (Submitted by the expert from Germany)

Transmitted by the expert from United Kingdom

In paper ST/SG/AC.10/C.3/2006/8 the expert from Germany proposes amendments to the text of 5.5.2.2 and 5.5.2.3. Whilst the expert from UK has no fundamental objection to that proposal, he notes this issue is also being discussed at IMO (see also UK INF paper 34) and that the text of chapter 5.5 in regard to fumigation units has been transposed in the IMDG Code to other sections of the Code.

Chapter 5.5 of the Model Regulations contains miscellaneous information covering special provisions for consignment procedures. These could be better reflected in other parts of the Model Regulations leading to deletion of Chapter 5.5.

The chapter deals with two main issues Class 6.2 and UN3359 fumigated transport units of Class 9.

- The text concerning Class 6.2 relates to classification and is essentially a repeat of 2.6.3.6.1
- The fumigated unit text relates to documentation, marking and placarding.

The expert from the UK therefore proposes that the sub-committee should now take the opportunity to review the placement of these texts.

Proposal and consequential changes

Chapter 5.5 Special provisions

Delete: 5.5.1 Special provisions applicable to the consignment of infectious substances

Reason: 5.5.1 and 5.5.1.1 can be deleted as it essentially reproduces text given in 2.6.3.6.1. Chapter 2.6 is where the user would look for text regarding the classification of infectious substances.

Delete 5.5.2 Documentation and identification of fumigated units

Delete paragraphs 5.5.2.1, 5.5.2.2, 5.5.2.3 and figure 5.5.1

Add to Chapter 5.3

A new 5.3.1.1.6 to read:

"5.3.1.1.6 Special provisions for Fumigated units

Class 9 placards [need/shall] not be affixed to a fumigated unit except as required for other class 9 substances or articles packed therein."

Justification – the IMDG Code has already removed the requirement for a Class 9 placard for fumigated units as it serves no safety purpose.

5.3.2 Marking

5.3.2.1 Display of UN numbers

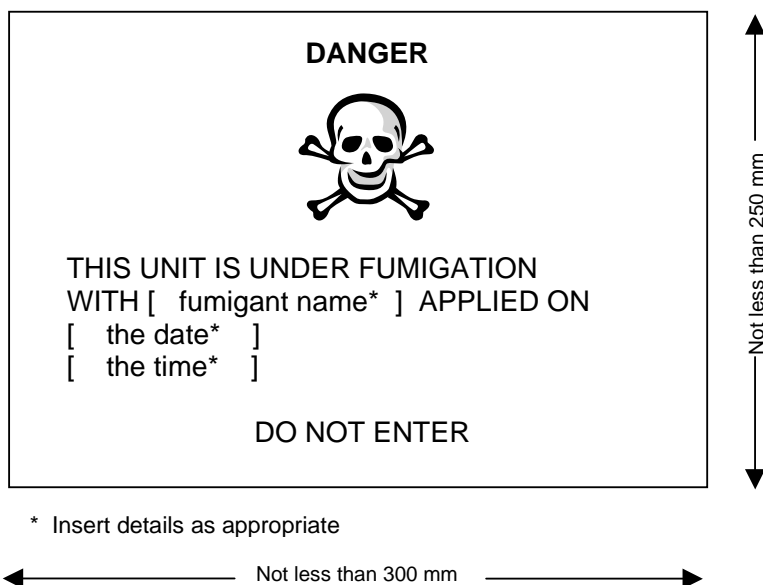
5.3.2.1.1 Except for goods of Class 1 and fumigated units, the UN number shall be displayed as required by this section on consignments of: *Remainder unchanged*.

Add a new 5.3.2.4 to read:

"5.3.2.4 Fumigated units

- .1 A warning sign as specified in 5.3.2.4.2 shall be placed on each fumigated unit in a location where it will be easily seen by persons attempting to enter the interior of the unit. When the fumigated unit has been ventilated to remove harmful concentrations of fumigant gas, the warning sign shall be removed.
- .2 The fumigation warning sign shall be rectangular and shall not be less than 300 mm wide and 250 mm high. The markings shall be black print on a white background with lettering not less than 25 mm high. An illustration of this sign is given in Figure 5.3.5.

Figure 5.3.5: Fumigation warning sign



Chapter 5.4 Documentation

Add a new 5.4.1.5.9 to read:

“5.4.1.5.9 Fumigated units

Transport documents associated with the transport of units that have been fumigated shall show the date of fumigation and the type and amount of the fumigant used. In addition, instructions for disposal of any residual fumigant including fumigation devices (if used) shall be provided.”

Chapter 5.5 Delete whole chapter.
