



Secretariat

Distr.
GENERAL

ST/SG/AC.10/C.3/2007/15
12 April 2007

Original: ENGLISH

**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

Thirty-first session
Geneva, 2-6 July 2007
Item 6 of the provisional agenda

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS
ON THE TRANSPORT OF DANGEROUS GOODS**

Definition of closed (cargo) transport unit

Transmitted by the expert from Australia

SCOPE

This proposal aims at recommending that a definition of 'Closed (cargo) transport unit' be incorporated into section 1.2.1.

RELATED DOCUMENTS

Informal documents:

UN/SCETDG/26/INF.40 - (Australia) Definition of Transport Units and Closed Transport Units.

UN/SCETDG/28/INF.28 - (Australia) Definition of (cargo) Transport Units.

UN/SCETDG/28/INF.30 - (Australia) Definition of Closed (cargo) Transport Units.

Official documents:

ST/SG/AC.10/C.3/2005/3 - (Australia) Definition of Transport Units and Closed Transport Units.

ST/SG/AC.10/C.3/52 – Report of the Sub-Committee of Experts on its 26th session.

ST/SG/AC.10/34/Add.1 – Report of the Committee of Experts on its 3rd session.

ST/SG/AC.10/C.3/54 – Report of the Sub-Committee of Experts on its 27th session.

ST/SG/AC.10/C.3/58 – Report of the Sub-Committee of Experts on its 28th Session.

Introduction

1. This document deals with the inclusion of a definition of ‘Closed Transport Unit’ in section 1.2.1. Consideration of this document is contingent on the decision regarding inclusion of the definition of ‘transport unit’ in section 1.2.1 as presented by the Expert from Australia in a separate document (ST/SG/AC.10/C.3/2007/18).

Issue

2. As noted in UN/SCETDG/28/INF.30, the term ‘Closed Transport Unit’ is not defined anywhere within the 14th edition of the Model Regulations or the amendments accepted for the 15th edition as detailed in ST/SG/AC.10/34/Add.1. However, the term is used in both volumes of the Model Regulations, as indicated in Table 1 below. The ‘closed’ nature of the transport unit, as employed in the UN Model Regulations and the IMDG code, is critical to the application of the relevant packing instructions as it is intended to provide an additional permanent enclosure for the packages contained within the unit. Such protection is required by the Model Regulations as it relates to multi-modal transport, and is carried over to the IMDG code.

Table 1: References to Closed (Cargo) Transport Unit

Volume	Reference to Closed (Cargo) Transport Unit
Volume 1	SP299
Volume 2	Section 4.1.2.3 P001 Special packing provision PP1 (see note 1) P002 Special packing provision PP7 and PP12 P002 Special packing provision PP37 (see note 1) P002 Special packing provision PP38 (see note 1) P410 – Note ‘d’, P900 IBC Special packing provisions B1 and B2

Note 1: The term ‘Closed Cargo Transport Unit’ was used in this reference.

3. While there is no definition provided in the Model Regulations for ‘Closed Transport Unit’ the use of the term in both the UN Model Regulations and the IMDG Code (termed ‘Closed Cargo Transport Unit’) for the references in table 2 is consistent. There are differences in the ADR where the term ‘closed vehicle’ is used to describe a vehicle body that can be closed and the terms ‘sheeted vehicle’ and ‘sheeted container’ are used to describe a sheeted load.

Table 2: Comparison of references between the UN Model Regulations and ADR 2007

<i>UN Reference</i>	<i>Terms used in respect of the reference</i>	
	UN Model Regulations	ADR 2007
SP299	Closed Transport Unit	SP299 not included in the 2007 ADR.
Section 4.1.2.3	Closed Transport Unit	No requirement in respect of closed vehicle or container
P001 Special packing provision PP1	Closed Cargo Transport Unit	No requirement in respect of closed vehicle or container
P002 Special packing provisions PP7 and PP12	Closed Transport Unit	Closed vehicles or containers
P002 Special packing provisions PP37 and PP38	Closed Cargo Transport Unit	Closed vehicles or containers
P410 – Note ‘d’	Closed Transport Unit	Closed vehicles or containers
P900	Closed Transport Unit	P900 reserved in the 2007 ADR (see UN SP 117 for UN 2216)
IBC Special packing provisions B1 and B2	Closed Transport Unit	B1 and B2 not included in the 2007 ADR*.

4. A ‘sheeted vehicle or container’, as defined in the ADR, does not meet the requirements for a Closed (Cargo) Transport Unit in the UN Model Regulations. However, it is not intended to, nor does this term cause a harmonisation issue as indicated by Table 2. The term ‘closed container’ as used in the ADR 2007 is consistent with the definition of ‘closed cargo transport unit’ as used in the IMDG code, with the exception that it relates only to freight containers. This fits well with the multi-modal use of freight containers. The term ‘closed vehicle’ indicates a vehicle that can be closed but is not a sheeted vehicle, this would include curtain sided vehicles.

5. As shown in table 2 there are no significant harmonisation problems between the UN Model Regulations and ADR 2007, but there are minor issues in respect of P002 and P410, in that the term ‘closed vehicle’ would appear to allow a curtain sided vehicle, which would not comply with the need to have rigid sides and top in the same manner as the closed container, or as required for a ‘closed (cargo) transport unit’ under the IMDG code. The expert from Australia considers inclusion of a definition for Closed (Cargo) Transport Unit in the Model Regulations would clarify the difference between a ‘closed vehicle’ acceptable for land transport, and a ‘closed (cargo) transport unit’ acceptable internationally for multi modal transport.

Proposal No. 1

6. Noting the purpose of the definitions and that the term ‘Closed Transport Unit’ is an important element of the packing instructions in the UN Model Regulations; the expert from Australia recommends the following definition be included in section 1.2.1:

* *Note by the secretariat:* Replaced by V10 and V12 (Column 16 of Table A of Chapter 3.2 of ADR as defined in section 7.2.4: Closed or sheeted vehicles/containers.

Closed transport unit: means a unit which totally encloses the contents by permanent structures. Cargo transport units with fabric sides or tops are not considered closed transport units.

Proposal No. 2

7. Noting the alternate use of the term ‘Cargo Transport Unit’ in the IMDG code, and the occasional use of the same term in the UN Model Regulations, and noting the separate paper submitted by the expert from Australia in respect of this issue, it is recommend the term ‘Closed Cargo Transport Unit’ is used in lieu of ‘Closed Transport Unit’. The expert from Australia recommends the following definition be included in section 1.2.1:

Closed cargo transport unit: means a unit which totally encloses the contents by permanent structures. Cargo transport units with fabric sides or tops are not considered closed cargo transport units.
