

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 2 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Amendments to the Provisions of Chapter 3.4

Transmitted by the Expert from the United States of America

1. The Expert from the United States of America appreciates the work of the Association of Hazmat Shippers (AHS) in preparing document ST/SG/AC10/C.3/2007/26 regarding the transport of dangerous goods in limited quantities in a form suitable for consumer use. The current provisions in the UN Model Regulations have been implemented to differing extents within national, regional and modal regulations, creating logistical challenges for international transport. Over the past several biennia, we have made progress in harmonizing the requirements for limited quantities and consumer commodities. Nevertheless, we agree that further work in this area is important to facilitate commerce and enhance safety. Shipments of dangerous goods transported as consumer commodities account for a large portion of the overall volume of shipments worldwide. We support the AHS proposal in principle, and are in favor of a solution which will lead to further harmonization of requirements for the transport of such goods. The AHS paper proposes a standardized packaging mark which we agree will further facilitate the efficient and safe transport of consumer goods.
 2. It is believed that a harmonized marking for outer packagings containing such goods could be included in Chapter 3.4. While no marking is currently required, national, regional and modal regulations have adopted varying unique requirements which cause problems for international transport including costly and impractical remarking of goods for onward movement once reaching an international point of distribution. A harmonized marking would significantly enhance the unrestricted international transport of such goods and would serve as a universally acknowledged mechanism for communicating hazards to emergency responders.
 3. In summary, the Expert from the United States of America favors a solution which would improve multimodal harmonization of transport requirements for limited quantities in a form suitable for consumer use and establish a harmonized marking requirement for packages containing such goods. The Expert from the United States would be willing to host and/or participate in a working group to further discuss this issue and work towards a resolution which would facilitate multimodal transport of consumer goods.
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