

## 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-third session  
Geneva, 30 June-9 July (a.m) 2008  
Item 4 of the provisional agenda

### LIMITED QUANTITIES (MULTIMODAL HARMONIZATION)

#### Transport of dangerous goods in limited quantities

#### Comments on ST/SG/AC.10/C.3/2008/17

#### Transmitted by the International Air Transport Association (IATA)

1. In ST/SG/AC.10/C.3/2008/17 the Expert from France proposes amendments to the provisions applicable to the transport of dangerous goods in limited quantities to harmonise the requirements, at least for surface transport. IATA supports the amendments proposed by the Expert from France, but notes that there is nothing in the proposal that would recognise dangerous goods packed in accordance with the ICAO limited quantity provisions as being acceptable for surface transport.
2. It was identified in discussions on limited quantities at previous sessions of the Subcommittee that the limited quantity provisions for the air mode are different from those in the Model Regulations. The ICAO Technical Instructions requires that packages containing dangerous goods in limited quantities must be marked with the proper shipping name and UN number for the dangerous goods contained in the package, the package must bear all applicable hazard labels and in addition the outside of the package must be marked the words “limited quantity” or “LTD QTY”.
3. Notwithstanding these additional requirements, the ICAO Technical Instructions only permits dangerous goods in limited quantities that are permitted according to Column 7a of the Dangerous Goods List in Chapter 3.2 of the Model Regulations. In addition the quantity of dangerous goods permitted in an inner packaging and in a single package for air transport is generally far less than that permitted by the Model Regulations.
4. However, because the packages have hazard labels there is often confusion when these packages move from air transport into surface transport where the expectation is that packages with hazard labels should also bear the UN specification packaging markings.

5. It is therefore proposed that in the revision to the limited quantity provisions in the Model Regulations there should be specific recognition of the differences for air transport.

**Proposal**

6. Add a new paragraph 3.4.9 to Annex 1 and Annex 2 in ST/SG/AC.10/C.3/2008/17 as follows:

"3.4.9 Packages prepared according to the limited quantity provisions for air transport may bear the marks and labels required by 5.2.1.1 and 5.2.2. In addition such packages may be marked with the words "limited quantity" or "LTD QTY".

---