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## 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-fourth session  
Geneva, 1-9 December 2008  
Item 12 of the provisional agenda

### PROGRAMME OR WORK FOR THE BIENNIUM 2009-2010

#### Intermodal Harmonisation

On 5 December 2008, during the 34th session of the UN SCE TDG, a lunchtime Working Group considered documents ~2008/65 and INF.20 relating to industry concerns about intermodal harmonisation.

The WG identified numerous areas where harmonisation was working well and identified numerous issues that needed to be addressed to improve the situation. During its work, potential solutions were identified for some of the issues.

These issues and potential solutions are presented below.

It now remains to:

- Identify actions to address each issue.
- Set priorities for the actions.
- Identify leaders to implement the actions to address the issues
- Implement the actions.

No	Issue	Potential solution	Action
1	Editorial differences	editorial WG/board	
2	Differences of substance [by regulators and industry]	document reasons for controversial decisions	
3	Inter-modal differences. (residual)	Identify the differences, develop agreed procedures between modes to cooperate	UK to circulate list of differences.
4	Unclear text	editorial WG/board	
5	National laws inconsistent with UNMR		
6	Changes to UNMR not always justified in a way that can be adopted by nations	Proposals to be accompanied by cost benefit analysis.	
7	Unrealistic time pressures	editorial board	

<b>No</b>	<b>Issue</b>	<b>Potential solution</b>	<b>Action</b>
8	Difficult to identify inter-modal differences.	WG to review	UK to circulate list of differences.
9	Modes sometimes identify problems that UNSC will not accept/resolve	develop agreed procedures between modes to cooperate	
10	Participants at UNSC may not have authority to effect changes Nationally/regionally		
11	Not clear what is meant by “harmonisation”		
12	Ease of access to decision making (some always possible for other committees to understand decisions of UNSC).		
13	Inadequate breadth of participation – Nations, Industry, modes.		
14	duplication of work on classification	develop agreed procedures between modes to cooperate	
15	Inconsistent opinions from national representatives at different forums	develop agreed procedures between modes to cooperate	
16	Some delegations don't have multimodal view. (not always possible to do this for some delegations)	Enhance the documentation of reasons for decisions for modes	
17	Inadequate procedure to resolve differences other than voting. .	rules of procedure minimal amount of support before proposal can be introduced (like IATA and RID/ADR)	

**What is working**

- Most modes are aligned (very near)
  - IMDG, RID/ADR are very close.
  - IATA and RID/ADR have minimum vote number requirements before a proposal will be adopted.
  - Efficient procedures for UNSC
  - Some lag between UNSC and implementation to allow review.
- There are some interagency agreements to align (IAEA and others)
- Decisions made public very promptly by Secretariat.
  - UNSC is open to all participants.

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5 December 2008

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