Note by the secretariat

The secretariat would like to thank EBU and ESO for the proposals in 2020/13 and is in support of the overall objective of making the content of 7.1.4.1 clearer and more transparent to the users. However, in order to align the content of the new proposals with the current 7.1.4.1, the following points may be considered:

- It is not clear that the maximum quantity of dangerous goods of 1,100,000 kg permitted per unit of a pushed convoy or side-by-side formation applies to all cases except for double-hull vessels meeting the additional construction rules in 9.1.0.88 to 9.1.0.95 or 9.2.0.88 to 9.2.0.95 and transporting dangerous goods of Classes 2, 3, 4.1, 4.2, 4.3, 5.1, 5.2, 6.1, 7, 8 and 9, for which a label of Model No. 1 is not required in column (5) of Table A of Chapter 3.2.

- The exception made in the current text for dangerous goods of classes 2, 3, 4.1, 4.2, 4.3, 5.1, 5.2, 6.1, 7, 8 and 9 carried in double-hull vessels meeting the additional construction rules in 9.1.0.88 to 9.1.0.95 or 9.2.0.88 to 9.2.0.95, for which a label of Model No. 1 is required in column (5) of Table A of Chapter 3.2 is not properly placed in the new proposal and may lead to problems of implementation.

- Provisions for the carriage of dangerous goods of Class 1 and mixed loads of substances and articles of different divisions of Class 1 in a single vessel are also not properly placed in the new proposal and may lead to problems of implementation.