



Secretariat

Distr.
GENERAL

ST/SG/AC.10/2000/17
11 September 2000

ORIGINAL : ENGLISH

**COMMITTEE OF EXPERTS ON THE TRANSPORT
OF DANGEROUS GOODS**

(Twenty-first session,
4-13 December 2000,
agenda item 2 (b))

WORK OF THE SUB-COMMITTEE OF EXPERTS

Draft amendments to the Recommendations on the Transport of Dangerous Goods

Comments on document ST/SG/AC.10/C.3/2000/5 (IMO)
Editorial and technical amendments to UN Model Regulations

Submitted by the International Council of Chemical Associations (ICCA)

1. INTRODUCTION

The International Maritime Organization (IMO) secretariat submitted a second proposal on editorial and technical amendments to the UN Model Regulations on which no decision was made during the eighteenth session of the Sub-Committee. The intent was to maintain consistent requirements in the UN Model regulations and the IMDG Code. Concerning the proposals on Part 4, Chapter 4.1, Organic Peroxides and Self-Reactive Substances, the International Council of Chemical Associations (ICCA) is of the opinion that some of the proposed changes are not only of an editorial nature, but will change transport requirements in the current UN Model Regulations. In this document some proposals are given to correct inconsistencies, to improve technical descriptions in the IMO proposal and to bring them in line with the current UN Model Regulations.

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2. PROPOSALS

On proposal ST/SG/AC.10/C.3/2000/5

Part 4, Chapter 4.1, section 4.1.7.0, General,

Proposal 1:

Delete proposed 4.1.7.0.1: “The packaging of an organic peroxide or self-reactive substance required to bear a subsidiary risk label of Class 1 shall comply with the provisions in 4.1.5.)”

Renumber proposed 4.1.7.0.2 to 4.1.7.0.1.

Justification:

Only part and certainly not all of the provisions of 4.1.5. are applicable to these type of organic peroxides and self-reactive substances. In packing instruction P520, Additional requirements, number 4, references are made to the relevant parts of 4.1.5.

Proposal 2:

Delete 4.1.7.2.3: “Emergencies to be taken into account are:

- .1 for an organic peroxide, the self-accelerating decomposition of the organic peroxide and fire engulfment; and
- .2 for a self-reactive substance of Class 4.1, the substance's ability to ignite easily from external sources such as sparks and flames and the likelihood of a strongly exothermic reaction caused by excessively high transport temperatures or by contamination.”

Justification:

Emergencies described in proposed 4.1.7.2.3.2 are based on the product properties as described in 2.4.2.3.1.2. Essentially they are the same as for organic peroxides. The emergencies to be taken into account are identical for self-reactive substances as for organic peroxides. This is also incorporated in the IBC instruction IBC520, Additional requirement 2 (for both self-reactive substances and organic peroxides). Emergencies described in proposed 4.1.7.2.3.1 are applicable to both self-reactive substances and organic peroxides. These are covered in IBC520.

If desired, the text can be integrated with proposed 4.1.7.2.5 (as proposed in proposal 4 of this document).

Proposal 3:

Amend proposed 4.1.7.2.4 to be read:

For self-reactive substances temperature control is required according to 2.4.2.3.4. For organic peroxides temperature control is required according to 2.5.3.4.1. Provisions of temperature control provisions are given in 7.1.4.3.1.

Renumber proposed 4.1.7.2.4 to 4.1.7.2.3.

Justification:

*The criteria for the application of temperature control are **not** similar for self-reactive substances and organic peroxides.*

Proposal 4:

Insert (see justification proposal 2) as the first sentence in proposed 4.1.7.2.5:

Emergencies to be taken into account are self-accelerating decomposition and fire engulfment.

Renumber proposed 4.1.7.2.5 to 4.1.7.2.4.
