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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

Twenty-seventh session, 4-8 July 2005
Item 7 of the provisional agenda

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS
ON THE TRANSPORT OF DANGEROUS GOODS**

Definition of transport units and closed transport units

Transmitted by the expert from Australia

SCOPE

This proposal aims at recommending that a definition of ‘Transport unit’ and ‘Closed transport unit’ be incorporated into section 1.2.1.

RELATED DOCUMENTS

UN/SCETDG/23/INF.23 - (Australia) Approval of Intermediate Bulk Containers.
ST/SG/AC.10/C.3/2003/56 - (Australia) Approval of Intermediate Bulk Containers.
UN/SCETDG/26/INF.40 - (Australia) definition of Transport Units and Closed Transport Units.
ST/SG/AC.10/C.3/52 – Report of the Sub-Committee of Experts on its twenty-sixth session
ST/SG/AC.10/32/Add.1 – Report of the Committee of Experts on its second session

Introduction

1. During the twenty-sixth session the expert from Australia presented INF.40 relating to the definitions of “Transport unit” and “Closed transport unit”. As noted in ST/SG/AC.10/C.3/52, para. 107, it was considered that this transfer might entail consequential changes in other chapters of the Model Regulations and, therefore, this should be done carefully in the next biennium on the basis of an official proposal that would take all consequences into account. Informal document UN/SCETDG/26/INF.40

noted that the Model Regulations do not define a “Transport Unit” or “Closed Transport Unit” within section 1.2.1 but these terms are used throughout volumes 1 and 2 of the UN Model Regulations. The assessment conducted as a result of the recommendations of the Sub-Committee has actually found that the term “Transport Unit” and “Cargo Transport Unit” are both used within the 13th revised edition of the Model Regulations to describe the same object.

Issue

2. The term “Transport Unit” is only defined in section 5.3.1.1.1 of the 13th revised edition of the Model Regulations but is widely used in both volumes of the Model Regulations. Table 1 indicates where the term “Transport Unit” has been used in both the 13th revised edition of the Model Regulations and within the amendments to it adopted under ST/SG/AC.10/32/Add.1 for inclusion in the 14th revised edition. Table 1 also indicates where the term “cargo transport unit” has been used in lieu of “transport unit”. There appear to be no inconsistencies in the employment of the term “Transport unit” (or “Cargo transport unit”) between any of these references.

Table 1: References to Transport Unit

Volume	Reference to Transport Unit
Volume 1	Para 11 and 12 of the introduction Section 2.4.2.3.2.4.(b).(ii), Section 2.5.3.2.5.1.(b) SP172, SP216, SP217, SP218, SP232 (see note 1) and SP297
Volume 2	Section 4.1.1.1 and 4.1.3.8.1.(a) P650, P906 (see note 1) Section 5.2.1.7.3, Section 5.3.1.1.1, Section 5.3.1.1.2, Section 5.3.1.1.3, Section 5.3.1.1.4, Section 5.3.2.1.1, Section 5.3.2.2, Section 5.3.2.3.1 Section 6.7.5.2.1, Section 7.1.1.3, Section 7.1.1.4, Section 7.1.1.5, Section 7.1.1.6, Section 7.1.1.7, Section 7.1.1.9, Note 2 to Section 7.1.1.9 (see note 1) Section 7.1.3.1.3, Section 7.1.4.1, Section 7.1.4.3.2.1, Section 7.1.4.3.2.2, Section 7.1.6.1.1, Section 7.1.6.1.2, Section 7.1.6.2.3, Section 7.2.4.4

Note 1: The term “Cargo Transport Unit” was used in this reference in lieu of “Transport Unit”.

3. The term “Closed Transport Unit” is not defined anywhere within the 13th revised edition of the Model Regulations or the amendments to it but is also used in both volumes of the Model Regulations as noted in Table 2 below. The table also indicates where the term “Closed Cargo Transport Unit” or “Closed type Cargo Transport Unit” has been used in lieu of “Closed Transport Unit”. While there is no definition provided for “Closed transport unit” there appear to be no inconsistencies in the employment of the term “Closed transport unit” (or “Closed Cargo Transport Unit”) between each of the references in Table 2 and the definition employed for “Closed Cargo Transport Unit” in the IMDG Code.

Table 2: References to Closed Transport Unit

Volume	Reference to Closed Transport Unit
Volume 1	SP299
Volume 2	Section 4.1.2.3 P001 special Instruction PP1 (see note 1), P002 special Instruction PP7 and PP12, P002 special Instruction PP37 (see note 2), P002 special Instruction PP38 (see note 1), P410 – Note ‘d’, P900 IBC Special Packing provision B1 and B2

Note 1: The term “Closed Cargo Transport Unit” was used in this reference.

Note 2: The term “Closed type Cargo Transport Unit” was used in this reference in the 13th revised edition but is referred to as a “Closed Cargo Transport Unit” in the amendments.

4. Given the fact that both the term “Cargo Transport Unit” and “Transport Unit” are employed for the same object and the fact that no definition is provided as to what constitutes a “Closed transport unit” there appears to be scope for confusion and ambiguity in this regard.

Proposal

5. Noting there are no changes in the amendments adopted for the 14th revised edition of the UN Model Regulations that will address this issue it is recommended that as a minimum the definition of “Transport Unit”, as given in section 5.3.1.1.1, be included in section 1.2.1 along with a definition for a “Closed Transport Unit”. It is proposed to use the definition of “Closed Cargo Transport Unit” as employed in section 1.2.1 of the IMDG Code for this purpose:

***Closed Transport Unit;** means a transport unit which totally encloses the contents by permanent structures. Transport Units with fabric sides or tops are not closed transport units.*

6. To promote inter-modal consistency and to resolve inconsistencies within the UN Model Regulations it is suggested that consideration be given to using the term ‘Cargo Transport Unit’ in lieu of “Transport Unit”. This change would have the added advantage of avoiding confusion between the acronym CTU used to describe a “Cargo Transport Unit” and its potential to be incorrectly employed for the term “Closed Transport Unit” as given in special packing provisions PP1, B1 and B2. The latter would then be a “Closed Cargo Transport Unit” or “Closed CTU”.

