

## 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-ninth session  
Geneva, 3-12 (a.m.) July 2006  
Item 6 of the provisional agenda

### LISTING, CLASSIFICATION AND PACKING

#### Transport of Nitroguanidine, wetted, (UN 1336) in flexible IBCs

#### Amendment to the proposal transmitted by the International Council of Chemical Associations (ICCA) in ST/SG/AC.10/C.3/2006/52

Submitted by the expert from Germany

Notwithstanding the support which is given to the proposal transmitted by ICCA, there is still some concern with respect to the possibility that handling, stowage and transport impacts may result in perforations of the flexible IBC leading to loss of contents and humidity as well as the mode of transport.

From the photographic documentation attached to the proposal by ICCA it is obvious that the positive experience in Germany is based on IBC's consisting of a flexible inner container put in a pallet based outer metallic container, the upper part of which is designed as a cage. These characteristics provide for the following safety functions:

- Safe handling by forklift without touching the flexible inner container;
- Protection of the flexible inner container against mechanical impacts, especially on the lower part of the container;
- Minimised confinement effect of the packaging by its design in form of flexible material and the cage structure in the upper part of the outer container.

The national derogation by which the positive experience in Germany with the transport of Nitroguanidine (product of high quality, where the water was really distributed homogeneously) in IBCs was possible for more than 15 years is restricted on road and rail transport only. Sea transport is not covered by this positive experience. However, negative experience concerning water distribution in wetted Nitroguanidine received in smaller packagings from overseas give reason to restrict shipments on road and rail transport only.

**Proposal:**

In order to adequately transfer the positive experience, the text of the proposed special provisions is proposed to read:

*“This substance may also be transported in IBCs. Only flexible IBCs (13H3, 13H4, 13H5, 13L3, 13L4) conforming to the packing group I performance level and protected by a handling device in accordance with 6.5.3.1.7, designed in form of a pallet based metal framework and capable of withstanding the stacking and bottom lift test of 6.5.6.4 and 6.5.6.6 are permitted on the following conditions:*

*(i) - (vi): as proposed;*

*(vii): replace by: Transport by sea in IBCs is prohibited.”*

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