

# UN/SCETDG/29/INF.52

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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

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Item 5 of the provisional agenda

### EXCEPTED QUANTITIES

Comments to ST/SG/AC.10/C.3/2006/45 (United Kingdom)

Transmitted by the expert from Belgium

#### **Introduction**

In his document ST/SG/AC.10/C.3/2005/42, the expert of the United Kingdom introduces a system of excepted quantities that is completely independent of the already existing limited quantity provisions, this separate approach being entirely based on the more severe provisions imposed on the packagings for excepted quantities.

The packaging provisions for excepted quantities that are being proposed by the United Kingdom will, however, create problems (they are outdated because of their descriptive nature, the test provisions lack the necessary precision and no manufacturing mark is introduced to indicate that the packagings fulfil the requirements).

Some other important points still need to be decided on in principle :

- are packing group I substances to be allowed as excepted quantities ?
- what is to be done about large quantities of these packagings in the same transport unit ?

Some problems that are more of an editorial nature also remain.

#### **Comments and proposals**

1. The United Kingdom proposal would create a new and completely separate kind of packaging, built according to a tested prototype but not identifiable as such. But there is in fact no necessity to do this, because the packagings that are dealt with in paragraph 6.1.5.1.7 of the Modal Regulations are to a large extent the ones that are envisaged for the excepted quantities. It only needs to be stipulated that certain types of outer packagings are not acceptable, and that the means of containment, envisaged in 6.1.5.1.7 (f), are always required and have to fulfil the requirements now given in 3.5.1.3 (b) of the United Kingdom proposal.

This way forward would automatically solve the marking problem and make part of 3.5.1.3 and the whole of 3.1.5.4 redundant. The excepted quantity packagings would, moreover, fit into the general system of chapter 6.1.

If the sub-committee shares this view, Belgium is prepared to introduce a comprehensive text proposal for the next meeting of the sub-committee.

2. There still remain difficulties with the substances allowed as excepted quantities that mainly concern substances of packing group I (a substance with a class 8, packing group I hazard and a division 6.1, packing group I hazard (classified as 6.1, packing group I) is allowed for example, whilst a substance with the same class 8, packing group I hazard and no secondary hazards is not!).

It is therefore proposed not to accept packing group I substances as excepted quantities.

3. The provisions that are being proposed in 3.5.1.6 and in 3.5.1.7 are of little or no practical use. What is the benefit of excepted quantity shipments, when the marking of the transport unit and a statement in a transport document are needed? The safety concerns that are at the basis of these paragraphs are better taken care of if a maximum limit per transport unit is introduced for the carriage of excepted quantities.

It is proposed to replace 3.5.1.6 and 3.5.1.7 with the following:

“3.5.1.6 Transport units shall not carry more than [1000 packages] of dangerous goods in excepted quantities.”

4. In 3.5.1.1 (c), the general packaging provisions of 4.1.1.5 are not retained. This is correct for 4.1.1.5.1, but not for 4.1.1.5 itself. There the part concerning the orientation markings is superfluous, but not the rest (especially the statement that any leakage of the contents shall not substantially impair the protective properties of the outer packaging, since the proposed 3.5.1.4 (b) is limited to the cushioning and absorbent material).

It is therefore proposed to replace the text of 3.5.1.4 (b) with:

“**[Contrary to 6.1.5.1.7 (f)]** each inner packaging shall **[always]** be securely packed in an intermediate packaging with cushioning material **in such a way that, under normal conditions of transport, they cannot break, be punctured or leak their contents**. The intermediate packaging shall completely contain the contents in case of breakage or leakage, regardless of package orientation. For liquid dangerous goods, the intermediate packaging shall contain sufficient absorbent material to absorb the entire contents of the inner packaging. In such cases, the absorbent material may be the cushioning material. **The contents** shall not react dangerously with cushioning, absorbent **and packaging** material or reduce the integrity or function of the materials. “

*NOTE: The text between square brackets depends on what will be decided concerning the first Belgian proposal.*

5. Paragraph 3.5.1.1 (b) is superfluous (it is simply impossible to apply the excepted quantities provisions without a correct classification of the dangerous goods involved) and incomplete (part 3 with its dangerous goods list, for example, plays an essential part in the excepted quantities provisions, but is not retained).

Belgium proposes therefore to eliminate this paragraph.

6. The proper place for paragraph 3.5.1.1 (c) is in the packaging requirements of 3.5.1.3.

Belgium proposes to eliminate 3.5.1.1 (c), and to introduce a new paragraph in 3.5.1.3 as follows: “each package shall fulfil the requirements of 4.1.1.1, 4.1.1.2, 4.1.1.4, 4.1.1.4.1 and 4.1.1.6.”

7. The provisions for dangerous goods packed in excepted quantities will not be made applicable to radioactive goods of class 7, according to UN/SCETDG/29/INF.3/Rev.1. The provisions of 2.7.7.1.2.1 and 2.7.9.1 concerning radioactive material in excepted packages are totally independent of this new chapter 3.5.

Paragraph 3.5.1.1 (d) is therefore to be eliminated.

8. Paragraph 3.5.1.4 (a) is extremely old-fashioned descriptive text and should be modernised and made more performance-based. The part concerning closure and caps is already adequately covered by 4.1.1.1 and 4.1.1.2 that remain applicable.

If the sub-committee shares this view, Belgium is willing to introduce a text proposal for the next meeting of the sub-committee.

9. The second part of 3.5.1.3 (f), beginning with the words “provided there are”, is already covered by 4.1.1.6 and can be eliminated.
10. It is not clear how 3.5.1.3 (e) is to be interpreted, taking account of 3.5.1.5.2. Some clarification would be welcome and necessary.
11. The second sentence of 3.5.1.5.3 only repeats the first one and can be eliminated.
12. The horizontal line in column 7 of the dangerous goods list is not really necessary for clarity (as is proven by the mixed use of P-, IBC- and LP-codes in column 8 without any problems).

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