

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

Thirty-first session
Geneva, 2-6 July 2007
Item 4 of the provisional agenda

Working Group on Limited Quantities July 2007

The principle of having reduced requirements, with some residual level of controls for Limited Quantities was generally agreed. The meeting commenced with a review of all the different requirements to identify areas of disharmony to focus the work. (see table below). It was agreed for the discussion to leave LQ by air out of the discussion because the differences are too great. It was agreed that there was no need to make any changes in the areas of Scope, Threshold, Packing, and Segregation. This left the issues of documentation and marking to be resolved.

Marking

The concept of LQ in air mode is too different in terms of definition and exemptions from all other modes so WG left that area open. And it presents minimal problems for other modes **except** for the labelling issue, where DG labelled for air transport (with a DG diamond) are subsequently transported by land. These consumer goods as LQ may need no documentation for land transport for example but carriers may be confused when they see the dangerous goods diamond on the packagings.

It was noted that the principle of a generic marking for LQ and Consumer Commodities for all modes (except LQ by air) was a way forward as this requirement could be accepted even where there is no requirement for marking now.

There is a significant problem for air transport, where surface materials might inadvertently be transported by air in unsuitable packagings. One solution would be to specifically identify materials/packagings that are only suitable for land transport or alternatively, suitable for air and surface transport.

North America recognises the diamond with UN Nos in it as a means achieving compliance with their various domestic regulations. It blends the concepts of Consumer Commodities and LQ to require the same regulatory controls. In this way, North America would also then be able to recognise some new Universal Mark. And the concept of Consumer Commodities could be dismissed. This would bring the requirements for Europe and North America together.

It appears that air transport needs an indicator of some sort to demonstrate that their Consumer Commodities for air dangerous goods were in compliance with the pressure testing and Air's other unique requirements. This mark is currently the Class 9 label, which does not give specific information; the materials may in fact be flammable liquids etc. The same information could be communicated using a different mark that is compatible with all other modes. Some samples of suggested possible marks are shown below.

The WG noted that the opportunity arises for the ICAO DGP to consider revising terminology such that Consumer Commodities become LQ and a new term is found for LQ. This would substantially improve intermodal transport

Many participants were of the opinion that this generic marking was sufficient but the question was left open for wider consultation with other groups (RID, IMO, ICAO, North America, etc)

Documentation

It appears that the documentation issue may be resolved by accepting the modal documentation. Thus, if North America requires documentation and Europe does not, the intercontinental transport leg will result in documentation that will be acceptable for land transport at the consignee end of the transport route.

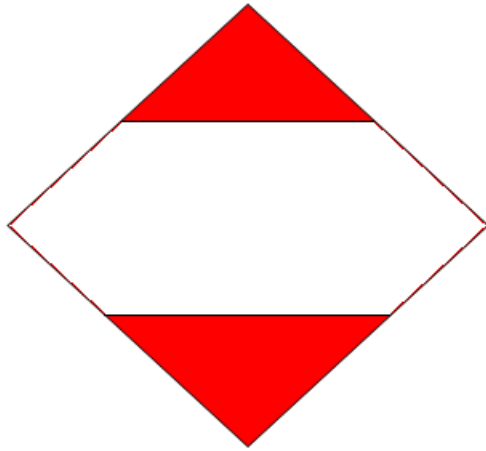
LQ/Consumers Commodities Provisions In The Different Modes And Regulations 2007/07/04

Provisions		UN	IMDG	ICAO	RID/ADR	49 CFR	TDG Canada
SCOPE in terms of class and PG	LQ	According to DGL	Same as UN	Same as UN	Same as UN	Same as UN except PGII 6.1	Same as UN
	Consumer Commodities	Same as LQ Definition based on the destination of the product	Same as UN	Restricted to C13 PG II 6.1, PG III aerosols Note 1.	Same as UN	Same as UN except PGII 6.1	Same as UN
THRESHOLD	LQ	According to DGL	Same as UN	More restrictive Note 1	Same as UN	Same as UN	Same as UN
	Consumer Commodities	Same as LQ	Same as UN	Specific limits smaller than UN LQ Note 1		Same as LQ	Same as LQ
PACKING	LQ	General instructions	Same as UN	General instructions Capability test drop +stacking Note 1	Same as UN	Same as UN	Similar to UN General Instruction
	Consumer Commodities	General instructions	Same as UN	Capability test drop filling ratio Note 1	Same as UN	Same as UN	Similar to UN General Instruction
SEGREGATION	LQ	Inside the outer packaging	Same as UN	Same as UN	Same as UN	Same as UN	No specific requirements
	Consumer Commodities	Same as LQ	Same as LQ	Same as LQ	Same as LQ	Same as UN	No Specific requirements
PACKAGE MARKING	LQ	Specific: UN No.	Specific: UN No.	Specific: Full package labelling.	UN No or generic label.	Specific: PSN or UN NO	Generic: Word L- Q-
	Consumer Commodities	None [but open to change].	None but open to change.	Generic: ID8000 label C19 Consumer Commodities	Generic: No specific provisions Consumer Commodities are shipped under LQ	Generic: ORM-D	Generic: Word L- Q-
DOCUMENTATION	LQ	Yes	Yes	Yes	No	Yes	Over 500 kg from one consignor – with Ltd Qty and class
	Consumer Commodities	None	Yes	Yes declared as ID8000	No	Yes	Same as LQ

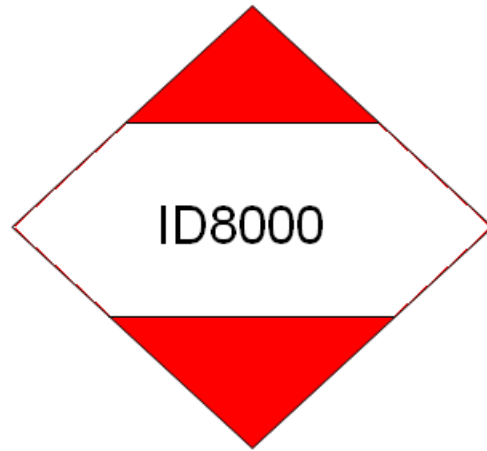
Note 1 problem for air mode mainly as materials can go from air to other modes. No change needed.

Potential New Limited Quantity Marking

Surface Modes:



Air Mode*:



*Note: Suggested Air Mode marking is a suggestion only and would of course need to be discussed by the ICAO Dangerous Goods Panel.