

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

Clarification Regarding Information Required on the Dangerous Goods Transport Document

Transmitted by the International Vessel Operators Hazardous Materials Association
(VOHMA)

Discussion

1. Chapter 5.4 of the Model Regulations at 5.4.1.4 specifies the information required to be entered on the dangerous goods transport document. Section 5.4.1.4.1 paragraphs (a) through (e) prescribes the information required within the basic description and section 5.4.1.4.2 requires that those five elements of information in the dangerous goods description shall be entered in the specific sequence with no information interspersed, except as provided within the regulations. Section 5.4.1.4.3 (b) states that “Empty means of containment, (including packagings, IBCs, bulk containers, portable tanks, tank-vehicles and tank-wagons) which contain the residue of dangerous goods of classes other than class 7 shall be described as such by, for example, placing the words “EMPTY UNCLEANED” or “RESIDUE LAST CONTAINED” before or after the proper shipping name.”

2. In practice, many of the multiple use packagings such as IBCs, portable tanks, bulk containers, tank-vehicles and tank-wagons following discharge of their contents are returned to the consignor and are accompanied by a copy of the original document prepared by the consignor with the words “EMPTY UNCLEANED” or “RESIDUE LAST CONTAINED” entered on the document either following the basic description and replacing the indication of the quantity previously contained or preceding the basic description. Many computer systems used for electronic data interchange (EDI) are programmed to reject a dangerous goods description with additional information interspersed within the five elements of the basic description.

3. ADR, at sections 5.4.1.1.6.2.2 and 5.4.1.1.6.2.3 authorize the entry for empty tanks, tank vehicles and other containers to precede the basic description, and further on a return of such an empty to the consignor where the transport documents used for the full capacity carriage are also used for the return, to replace the entry for the quantity with the words “EMPTY, UNCLEANNED RETURN.”
4. The US DOT regulations at section 172.203 (e) authorize the entry of the words “RESIDUE LAST CONTAINED” in association with the basic description of the hazardous material last contained in the packaging.
5. The mandatory description and sequence with the UN identification number, proper shipping name, hazard class, subsidiary hazard class(es), and packing group when applicable will very soon be required by all modes. The words “EMPTY UNCLEANNED” or “RESIDUE LAST CONTAINED” would, under the current regulation, actually be required to be entered either between the UN identification number and the proper shipping name, or optionally between the proper shipping name and the hazard class both of which appear awkward, particularly when used in an emergency response situation.

Proposal

6. The Sub-Committee is invited to clarify the intent of the regulation to convey the fact that the packaging contains only residue while not changing the basic description requirements or sequence requirements of the current regulations. The text of 5.4.1.4.3 (b) could be clarified by amending as follows:

5.4.1.4.3 (b)

Empty uncleaned packagings, bulk containers, and tanks: Empty means of containment, (including packagings, IBCs, bulk containers, portable tanks, tank-vehicles and tank-wagons) which contain the residue of dangerous goods of classes other than class 7 shall be described as such by, for example, placing the words “EMPTY UNCLEANNED” or “RESIDUE LAST CONTAINED” before or after the proper shipping name basic description required at 5.4.1.4.1 paragraphs (a) through (e).”
