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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

Thirty-third session  
Geneva, 30 June-9 July (a.m) 2008  
Item 7 of the provisional agenda

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

Proposal to amend Chapter 5.4 (section 5.4.1.5.1):  
Entry for total quantity of dangerous goods  
on multimodal dangerous goods form

Transmitted by the International Vessel Operators  
Hazardous Materials Association, Inc. (VOHMA)\*

**Background**

1. The 15<sup>th</sup> revised edition of the Recommendations on the Transport of Dangerous Goods Model Regulations (ST/SG/AC.10/1/Rev.15, Vol. II), Chapter 5.4, Section 5.4.1.5.1 includes provisions for entering the total quantity of dangerous goods on the dangerous goods transport document. The section requires “Except for empty uncleaned packagings, the total quantity of

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\* In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.3/60 para. 100 and ST/SG/AC.10/C.3/34, para. 14)

dangerous goods covered by the description (by volume or mass as appropriate) of each item of dangerous goods bearing a different proper shipping name, UN number or packing group shall be included. For Class 1 dangerous goods, the quantity shall be the net explosive mass. For dangerous goods transported in salvage packagings, an estimate of the quantity of dangerous goods shall be given. The number and kind (e.g. drum, box, etc.) of packages shall also be indicated. UN packaging codes may only be used to supplement the description of the kind of package (e.g. one box (4G)). Abbreviations may be used to specify the unit of measurement for the total quantity.” At Figure 5.4.1 the example of a MULTIMODAL DANGEROUS GOODS FORM, which may be used as a combined dangerous goods declaration and container packing certificate for multimodal transport of dangerous goods illustrates an asterisks preceding the heading “Number and kind of packages; description of goods”. The asterisks refers to the note in the left margin of the illustrated document and states “\*FOR DANGEROUS GOODS; you must specify: UN No., proper shipping name, hazard class, packing group (where appropriate) and any other element of information required under applicable national and international regulations.”

2. Chapter 6.1, addresses the mandatory marking of UN standard packaging and section 6.1.2.3 states “In the case of combination packagings, only the code number for the outer packaging is used.” While the current regulations in Chapters 5.4 and 6.1 do not specify that the inner packagings within the outer packaging of a combination packaging must be identified by number, type and capacity, some national authorities are requiring that this information be entered on the shipping documents. In some ports, authorities are requiring this information as a condition for discharge of cargo and denying offloading of cargo when it is not available.

3. Since the Model Regulations and the modal codes based on the UN Model Regulations do not require the information regarding the identification of the type, number or capacity of each inner packagings within the combination packaging, this information is not readily available to secondary shippers, distributors, forwarders, carriers, or others who may be required to provide this information at some subsequent time while in transportation. In fact, the only person who would have knowledge of the type, number and capacity of the inner packagings would be the person who completed the packing of the packaging and the closure of the package. Persons handling those packages from that point forward would have no way to determine or to verify the inner receptacle details without physically opening the package which might then render the package unfit for continued transportation unless it could be reclosed to the packaging manufacturers instructions for closure. Those packages packed within a sealed cargo transport unit could not be expected to be examined in this manner. Absent the declaration of this information by the initial shipper, there currently is no means for anyone else in the transportation or distribution chain to have such plausible knowledge.

4. VOHMA questions the value of providing this information from a safety standpoint and we do not believe it is intended to be required by the Model Regulations. When furnishing this information is imposed as a mandatory condition of discharge of cargo from a vessel, it creates a significant impediment to continuing multimodal transportation and these denials and delays may negatively impact safety.

### **Action requested of the Sub-Committee**

5. To eliminate the impediment, this sub-committee is invited to make a determination that there is no justifiable and articulable reason to require that the person performing the packaging and closure function of a package containing dangerous goods must declare the number, type, and capacity of each of the inner packagings within the outer packaging of a combination packaging and to clarify the current requirement of 5.4.1.5.1.

### **Proposal**

6. In order to clarify the intent of the Model Regulations and avoid confusion and delays in transport, it is proposed that the text in section 5.4.1.5.1, be amended by adding the sentence:

“The number, type, and capacity of each inner packaging within the outer packaging of a combination packaging need not be indicated.”

The sentence is proposed to be added directly after the sentence ending in (e.g. one box (4G)).

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