

**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-fourth session
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Item 4 (c) of the provisional agenda

MISCELLANEOUS

Special Provision 274 – Comments on ST/SG/AC.10/C.3/2008/63

Transmitted by the expert from the United States of America

In document ST/SG/AC.10/C.3/2008/63, CEFIC proposes that Special Provision 274 be reinstated for a number of proper shipping names for which technical names are not currently required. Among those entries, of particular concern are those related to medicines, which include:

MEDICINE, LIQUID, TOXIC, N.O.S (UN 1851)
MEDICINE, LIQUID, FLAMMABLE, TOXIC, N.O.S. (UN 3248)
MEDICINE, SOLID, TOXIC, N.O.S. (UN 3249)

The requirement to supplement the proper shipping name with a technical name was consciously and carefully removed by the Sub-Committee for all of the entries considered in 2008/63. In particular, the Sub-Committee carefully debated the issue as it pertains to medicines. These discussions are documented in ST/SG/AC-10/C.3/R.109, and ST/SG/AC.10/R.284, submitted during the Sub-Committee's sixteenth session by the expert from the United Kingdom and the expert from Canada, respectively.

Currently, Special Provision 220 which is applied to MEDICINE, LIQUID, FLAMMABLE, TOXIC, N.O.S. (UN 3248), specifically requires a technical name only for the flammable constituent of the medicine. This limitation was added by the Sub-Committee to address concerns over the disclosure of controlled medicinal substances whose identity in transport could lead to practical and logistical problems including theft and unauthorized use and distribution.

It is therefore proposed that Special Provision 274 not be re-applied to the proper shipping names related to medicines (UN 1851, UN 3248, and UN 3249) as proposed by CEFIC.
