



**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****Fifty-ninth session**

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Item 11 of the provisional agenda

Unified interpretations of the Model Regulations**Request for interpretation of special provision 141 of UN 2969****Transmitted by the expert from the Republic of Korea*****Introduction**

1. In the Model Regulation, sixty-three special provisions stipulate that it is not subject to the Model Regulation.
2. The sub-committee on Carriage of Cargoes and Containers (CCC) is reviewing special provisions of the International Maritime Dangerous Goods (IMDG) code since their sixth meeting. Some substances can be handled and transported as non-dangerous goods if they meet the requirements of special provisions. Several delegations of CCC have raised concerns because if the exemption regulations were abused, it could falsely declare dangerous goods, which could cause loss of human life, environment, and economy.
3. The sub-committee on CCC conducted a review of the special provisions 9XX of the IMDG code and completed the classification work into seven categories. And it has also been reviewing special provision 925 on the dangers of CARBON, UN 1361 since the fifth meeting of CCC in September 2018. Additionally, the sub-committee on CCC has proposed the reorganization of the correspondence group for further review (CCC 7/6/2, CCC 7/6/2/Add.1).
4. Apart from CARBON, UN 1361, the Republic of Korea would also like to propose a review of special provision 141 of UN 2969.
5. IMDG code describes the properties and observations of UN 2969 as follows:
“Whole beans or meal. The latter is the residue remaining after the oil has been extracted from the seeds. Castor beans contain a powerful allergen which, by inhalation of dust or by skin contact with crushed bean products, can give rise to severe irritation of the skin, eyes and mucous membranes in some persons. They are also toxic by ingestion. When handling these products, wear at least a dust mask and goggles. Avoid unnecessary skin contact.”
6. UN 2969 is classified as a dangerous goods according to the UN Model Regulations thus it shall be packaged and transported as dangerous goods. However, according to special provision 141 of UN 2969, there is an exception that “Products which have undergone

* A/75/6 (Sect.20), para. 20.51.

sufficient heat treatment so that they present no hazard during transport are not subject to these Regulations.”

7. In special provision 141, there are no criteria for risk removal or sufficient heat treatment procedure to judge “Products which have undergone sufficient heat treatment so that they present no hazard during transport”, so it is difficult to apply special provision 141. Moreover, when transporting non-dangerous goods under special provision 141, there is no requirement for the submission of related certificates, so it is difficult for shipping companies or the competent authority to understand the application of special provision 141.

Proposal

8. The expert from the Republic of Korea submits a request for interpretation of “sufficient heat treatment so that they present no hazard during transport” for special provision 141 of UN 2969 in the UN Model Regulations.

9. A castor bean has a very strong toxic substance called ricin and contains allergens. When heat treatment is performed to extract castor oil, ricin could be removed, but there are research reports that allergens remain in castor meal or castor pomace or castor flake even after heat treatment.

10. It is questionable how to interpret the condition of “no hazard during transport” in special provision 141. In the absence of standards such as toxicity value (inhalation, skin and dermal) or ricin content, the wording “no hazard during transport” is paradoxical.

11. Furthermore, the provision not to apply the UN Model Regulations if sufficient heat treatment is performed without sufficient heat treatment standards to eliminate the risk (for example, heating at 100 °C for 30 minutes or more) is not reasonable.

12. The Republic of Korea pursued the rationale for an exemption according to special provision 141 of UN 2969 but could not find evidence.

13. Therefore, the Republic of Korea requests that the Sub-Committee of Experts on the Transport of Dangerous Goods interprets the reasons, standards or procedures for special provision 141 of UN 2969. And if the reasons, standards or procedures are not provided, it is proposed to delete special provision 141 that cannot be performed.
