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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

15 November 2021

### Sub-Committee of Experts on the Transport of Dangerous Goods

#### Fifty-ninth session

Geneva, 29 November – 8 December 2021

Item 6 (d) of the provisional agenda

#### Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: other miscellaneous proposals

## Deletion of transitional measures – Additional proposals to informal document INF.4 (59<sup>th</sup> session)

### Transmitted by the expert from Spain

### Introduction

1. In addition to those notes analyzed in informal document INF.4 (Spain) and INF.10 (Sweden), the following paragraphs also include references to outdated marking or labeling provisions:

- Special provision SP384
- 6.5.2.2.2
- 6.6.3.3

2. In the nineteenth revised edition of the Model Regulations, a new specific label for batteries was introduced in the ninth class. Also, a new special provision 384 was adopted to clarify that the label for batteries to be used was the one defined in Model No 9A and to add a note to allow the use of the previous label No 9 until 31 December 2018. As the relevant date for the use of this label has passed, this note should be deleted (Proposal 1).

3. Provisions in 6.5.2.2.2 and 6.6.3.3 contain the provisions on the symbol to indicate the maximum permitted stacking load applicable. As the relevant dates for the use of the previous symbol have expired, these notes should be reviewed.

4. The note of 6.5.2.2.2 that permits the use of the provisions of 6.5.2.2.2 from the seventeenth revised edition of the Model Regulations may continue to be applied to all IBCs manufactured, repaired or remanufactured between 1 January 2011 and 31 December 2016 and indicates the start of use of the present symbol as from 1 January 2011 onwards.

5. The note of 6.6.3.3 that permits the use of the provisions of 6.6.3.3 from the seventeenth revised edition of the Model Regulations may continue to be applied to all large packagings manufactured, repaired or remanufactured between 1 January 2015 and 31 December 2016 and indicates the start of use of the present symbol as from 1 January 2015 onwards.

6. In both paragraphs, the start of the applicability of the “new” symbol has expired a long time ago. Therefore, the first sentence of each note could be deleted (Proposal 2).

7. On one hand side, the timeframe in which the previous symbol could be used (1.1.2011 to 31.12.2016 and 1.1.2015 to 31.12.2016) has passed since a long time. On the other hand side, there may be IBCs or large packagings manufactured, repaired or remanufactured in this period that are still in use, and those IBCs and large packaging could still have the previous symbol.

8. Nevertheless, differences in between the present symbol and the previous were the introduction of the following sentences into 6.5.2.2.2 and 6.6.3.3:

- Editorial changes in the sentence: The symbol shall be durable and clearly visible;
- New sentence: Where the dimensions ante not specified, all features shall be in approximate proportion to those shown.

9. Therefore, if also the second part of the notes would be deleted (and as a consequence, the complete note), this should not lead to conflicts if previous symbols are still in use (Proposal 3).

## Proposals

### Proposal 1

In 3.3.1, delete the note to special provision 384:

“384: The label to be used is Model No 9A, see 5.2.2.2.2. However, for placarding of cargo transport units, the placard shall correspond to Model No 9.

NOTE: The class 9 label (Model No 9) may continue to be used until 31 December 2018.”

### Proposal 2

Modify notes under 6.6.3.3 and 6.5.2.2.2 deleting the first sentence in each case, as follows:

“ NOTE: ~~The provisions of 6.6.3.3 shall apply to all large packagings manufactured, repaired or remanufactured as from 1 January 2015.~~ The provisions of 6.6.3.3 from the seventeenth revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied to all large packagings manufactured, repaired or remanufactured between 1 January 2015 and 31 December 2016.”

“NOTE: ~~The provisions of 6.5.2.2.2 shall apply to all IBCs manufactured, repaired or remanufactured as from 1 January 2011.~~ The provisions of 6.5.2.2.2 of the seventeenth revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied to all IBCs manufactured, repaired or remanufactured between 1 January 2011 and 31 December 2016.”

### Proposal 3

Delete the note under 6.6.3.3 and 6.5.2.2.2.

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