



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

Sixty-fifth session

Geneva, 25 November-3 December 2024

Item 6 (d) of the provisional agenda

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

Other miscellaneous proposals

Amendment of special provision 172 (d) for the transport of dangerous goods of class 7

Transmitted by the expert from Germany*

I. Introduction

1. When transporting dangerous goods, subsidiary hazards must be indicated in the dangerous goods transport document in accordance with 5.4.1.4.1 of the *Model Regulations*. Where dangerous goods of class 7 are transported, special provision 172 must be applied. Within the framework of the application of special provision 172, it has been found that the wording in (d) of the special provision deviates from the wording in 5.4.1.4.1 (d). This leads to different interpretations when applying the provisions. In the interest of uniform application of special provision 172, Germany proposes that the wording of the special provision be amended.

II. Discussion

2. 5.4.1.4.1 reads as follows (highlighted by the author):

“5.4.1.4.1 *Dangerous goods description*

The dangerous goods transport document shall contain the following information for each dangerous substance, material or article offered for transport:

[...]

(d) **Subsidiary hazard class or division number(s) corresponding to the subsidiary hazard label(s)** required to be applied, when assigned, shall be entered

* A/78/6 (Sect. 20), table 20.5.



following the primary hazard class or division and shall be enclosed in parenthesis. [...].”

3. Special provision 172 reads as follows (highlighted by the author):

“172 Where a radioactive material has (a) subsidiary **hazard(s)**:

(a) The substance shall be allocated to Packing Group I, II or III, if appropriate, by application of the packing group criteria provided in part 2 corresponding to the nature of the **predominant subsidiary hazard**;

(b) Packages shall be labelled with subsidiary hazard labels corresponding **to each subsidiary hazard** exhibited by the material; corresponding placards shall be affixed to cargo transport units in accordance with the relevant provisions of 5.3.1;

(c) For the purposes of documentation and package marking, the proper shipping name shall be supplemented with the name of the constituents which most predominantly contribute to this (these) subsidiary **hazard(s)** and which shall be enclosed in parenthesis;

(d) The dangerous goods transport document shall indicate the **class or division of the subsidiary hazard** and, where assigned the packing group as required by 5.4.1.4.1(d) and (e).”

4. When looking at special provision 172, one notices that “hazard” is in the singular in the provision in (d). With a view to the provisions in (a) to (c) of special provision 172 and also in connection with 5.4.1.4.1 (d), the provision in (d) of special provision 172 should also cover the case that there are several subsidiary hazards. Therefore, “hazard(s)” should be used in (d). As an alternative, the word “the” before “subsidiary hazard” could be replaced by “each”.

5. Against this background, Germany proposes that (d) in special provision 172 be amended. The amendment does not negatively affect safety in the transport of dangerous goods. It serves the uniform application of the provisions.

6. The following proposal supports Sustainable Development Goal 16, *Peace, justice and strong institutions*, by promoting consistent regulations for the safe transport of dangerous goods.

III. Proposal

7. Amend special provision 172 to read as follows (new text is underlined, deleted text is ~~strikethrough~~):

Option 1

“172 [...]

(d) The dangerous goods transport document shall indicate the class or division of ~~the~~ each subsidiary hazard and, where assigned the packing group as required by 5.4.1.4.1 (d) and (e).”

Option 2

“172 [...]

(d) The dangerous goods transport document shall indicate the class or division of the subsidiary hazard(s) and, where assigned the packing group as required by 5.4.1.4.1 (d) and (e).”