



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

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Item 3 of the provisional agenda

Listing, classification and packing

Amendment to 2.0.2.7

Submitted by the expert from China*

I. Introduction

1. Paragraph 2.0.2.7 of the *Model Regulations* (Rev.23) reads:

“A mixture or solution containing one or more substances identified by name in these Regulations or classified under a N.O.S. entry and one or more substances is not subject to these Regulations if the hazard characteristics of the mixture or solution are such that they do not meet the criteria (including human experience criteria) for any class.”

2. The purpose of this provision is to specify that a mixture or solution should not be regarded as dangerous goods as long as it does not meet the criteria for any class or division, even if it consists of some ingredients which are classified as dangerous goods. However, the sentence itself is problematic.
3. First, in this sentence, the second “one or more substances” lacks necessary attributives to illustrate what sort of substances are referred to. From the context, it is not difficult to surmise that what is meant here should be “one or more substances not subject to these Regulations”, but the sentence itself is incomplete semantically.
4. Second, the sentence does not take into account another situation where a mixture or solution with all its ingredients classified as dangerous goods does not meet the criteria for any class or division itself.
5. This situation is rare but plausible when the ingredients are of different classes or divisions. For example, A is a solid that is classified as Division 6.1 due to an oral toxicity of 250 mg/kg bodyweight without meeting the criteria for any other classes or divisions. B is an environmentally-hazardous solid with an M-factor of 1, that will not potentiate the toxicity of A. The mixture consists of 80%A and 20%B will not meet the criteria for either Division 6.1 or Class 9, while A and B are both dangerous goods.

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



II. Proposal

6. In order to make the provision covering both situation where the mixtures or solutions consisting of dangerous goods and non-dangerous goods or of all different dangerous goods, the expert from China proposes to amend 2.0.2.7 as follows (new text **bold and underlined**, deleted text ~~striketrough~~):

“2.0.2.7 A mixture or solution containing one or more substances identified by name in these Regulations or classified under a N.O.S. entry ~~and one or more substances~~ is not subject to these Regulations if the hazard characteristics of the mixture or solution are such that they do not meet the criteria (including human experience criteria) for any class **or division**.”

III. Alternative proposal

7. If the Sub-Committee feels the situation mentioned in paragraphs 4 and 5 is too rare and it is not necessary to amend the provision for this special case, then, at least, the sentence should be completed by adding an attributive to the second “one or more substances”, as follows: (new text **bold and underlined**, deleted text ~~striketrough~~):

“2.0.2.7 A mixture or solution containing one or more substances identified by name in these Regulations or classified under a N.O.S. entry and one or more substances **not subject to these Regulations** is not subject to these Regulations if the hazard characteristics of the mixture or solution are such that they do not meet the criteria (including human experience criteria) for any class **or division**.”
