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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**

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

**Forty-first session**

Geneva, 25 June – 04 July 2012

Item 8 of the provisional agenda

**Global harmonization of transport of dangerous goods regulations  
with the Model Regulations**

**Harmonization with the United Nations Model Regulations**

**Transmitted by the expert from Switzerland<sup>1</sup>**

*Summary*

<b>Executive summary:</b>	The ICAO Dangerous Goods Panel should take account of the problems that 1.4S articles carried in line with chapter 3.4 are likely to encounter during the land section of their journey.
<b>Action to be taken:</b>	Request the ICAO Dangerous Goods Panel to reverse its decision not to apply the provisions of chapter 3.4 to 1.4S articles.
<b>Related documents:</b>	Informal document INF.40 submitted to the fortieth session of the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods.

1. At its fortieth session, the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods was informed in informal document INF.40 of the decisions taken by the ICAO Dangerous Goods Panel (DGP), including one in paragraph 5 not to adopt the provisions of chapter 3.4 for 1.4S articles. The reason given was that, in the case of air transport, there was no difference between the requirements for limited quantity packages and those for transport not covered by chapter 3.4.

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

2. This decision is likely to cause problems for consignments in a transport chain that includes land transport over a section of the journey. Such consignments will have danger labels affixed to their packaging, and will be accompanied by a Dangerous Goods Declaration, as with any transport of dangerous goods to which the exemptions under chapter 3.4 are not applied. Thus they will not be able to benefit from the simplifications specified in chapter 3.4 on the land sections of the journey and will hence be subject to all the provisions of RID-ADR-ADN. The transport document will also have to include the information necessary for land transport (e.g., tunnel restriction codes, driver's instructions, driver's training, etc.).

3. Paragraph 5 of informal document INF.40 also states that packaging marked in accordance with chapter 3.4 for other forms of transport will be accepted for air transport, without any additional procedure. However, in contrast to the requirements for air transport, chapter 3.4 contains no requirement that danger labels be affixed together with the marking specified in 3.4.7; hence, a package that has only the marking specified in 3.4.7 under the provisions of chapter 3.4 of RID-ADR-ADN would not comply automatically with the labelling requirements for air transport. It would not have the danger labels. It must therefore have both the marking specified in 3.4.7 and the danger labels. Furthermore, the marking specified in 3.4.8 would not be accepted for air transport of 1.4S articles, so that a consignor who wished to send a consignment under the exemption in chapter 3.4 would have to use the marking specified under 3.4.7 as well as the labels and markings required under part 3, chapter 4, of the ICAO technical instructions. Now, because danger labels don't appear in the list of applicable provisions for land transports, the presence of danger labels is incompatible with an LQ marking, so that the consignment will encounter problems for land transport if it is not clearly explained in the relevant texts.

4. The problem is that neither the consignor nor the inspecting authorities are informed of these circumstances under chapter 3.4. The simplest solution would have been for DGP to agree to the marking specified in 3.4.8 for these consignments. The UN Subcommittee should alert DGP to this matter.

5. However, this does seem extremely complicated and should only be proposed if DGP does not reverse its decision not to apply the provisions of chapter 3.4 for 1.4S articles

- (a) To add in the list of applicable provisions for the land transport in 3.4.1 e) iii) after 5.2.1.7 ", 5.2 for articles of Division 1.4, Compatibility group S,".
- (b) Be specified in 3.4.8 that the marking in that section is not authorized for 1.4S articles, and
- (c) Be specified in 3.4.7 that 1.4S articles for air transport require the marking specified under 3.4.7 in addition to the appropriate markings specified in part 3, chapter 4, of the ICAO technical instructions.

6. However, this does seem extremely complicated and should only be proposed if the DGP does not reverse its decision not to apply the provisions of chapter 3.4 for 1.4S articles.