



**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-third session**

Geneva, 24–28 June 2013

Item 6 (f) and (g) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: marking and labelling. Packagings****Excepted quantity provisions regarding the use of absorbent
material and marking****Transmitted by the International Council of Chemical Associations
(ICCA)¹****Introduction**

1. In relation to the discussions regarding the implementation of new exemptions for environmentally hazardous substances at the forty-first session ICCA proposes considering two additional issues, which would apply to all classes and would not be limited to environmentally hazardous substances:

- (a) The location where the absorbent material is placed i.e. inside an intermediate packaging or inside an outer packaging;
- (b) The need for counting the number of packages and the limitation to 1000 packages per transport unit.

2. These issues have been detected, based on the use of the provisions for exempted quantities. This means they are based on practical experience and ICCA does not see a safety issue in a change.

¹ In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

Location of absorbent material

3. Instead of placing the absorbent material into the intermediate packaging it could also be placed into the outer packaging. Many end-users like dentists or physicians receive a wide variety of products, shipped as excepted quantities and they do not want to receive the absorbent material in the packaging they will eventually use i.e. the intermediate packaging. They indeed unpack the intermediate packagings from the outer packaging and use or store them in their laboratory or surgery. Therefore they do not want to have the absorbent material in the intermediate packaging but want to dispose of the absorbent material together with the outer packaging upon reception of the package. When the absorbent material is placed in the outer package, the volume of the absorbent material would not be reduced! Therefore this way of packaging and transporting offers the same level of safety.

4. If however an additional safety level would be judged necessary, a requirement for the inner package in the intermediate packaging (without the outer packaging) to withstand a drop test. This would eliminate the risk of any leakage.

Proposal 1

4. ICCA therefore proposes amending section 3.5.2 as follows (new text underlined):

“3.5.2 Packagings

Packagings used for the transport of dangerous goods in excepted quantities shall be in compliance with the following:

- (a) ... ;
- (b) Each inner packaging shall be securely packed in an intermediate packaging with cushioning material in such a way that, under normal conditions of transport, it cannot break, be punctured or leak its contents. The intermediate packaging shall completely contain the contents in case of breakage or leakage, regardless of package orientation. For liquid dangerous goods, the intermediate packaging shall contain sufficient absorbent material to absorb the entire contents of the inner packaging. In such cases, the absorbent material may be the cushioning material. Dangerous goods shall not react dangerously with cushioning, absorbent material and packaging material or reduce the integrity or function of the materials;

Alternative 1

Cushioning material and/or absorbent material may instead be placed in the outer packaging of the intermediate packaging.

Alternative 2 (if a drop test for the inner packaging would be required)

In case the inner packaging in the intermediate package can withstand the drop test prescribed in 3.5.3, cushioning material and/or adsorbent material may be placed in the outer package instead of in the intermediate package.

- (c) ... ; “

Number of packages

5. Another barrier for efficient use of the excepted quantity provisions for the distribution of consumer commodities is the limitation of the maximum number of packages in 3.5.5. In principle, we see no reason to limit the package number for these extreme small amounts of substances per package, as the same amount can be shipped via road or ocean freight in less safe packages as Limited Quantities. The huge benefit of the EQ provisions is that it can be used for air and land transport without having to change the packagings. Therefore a limitation of the number of packages for road and sea transport is hard to understand.

6. Additionally the removal of the limitation to 1000 packages would have a beneficial impact on the environment (carbon footprint) as, especially for transports between manufacturing sites and distribution centers, full cargo loads could be achieved, herewith substantially decreasing the number of trips required.

7. In order to align the requirements for Excepted Quantities with the requirements for Limited Quantities, to make the regulations more consistent, ICCA proposes introducing in 3.5.5 marking provisions for cargo transport units carrying more than 8 t of EQ packages. This is in line with the approach recently adopted for limited quantities, where the label applicable for the package was enlarged to be used as a placard. Consequentially the number of packages would no longer have to be indicated on a transport document as required in 3.5.6 if the transport unit would be marked according to 3.5.5.

Proposal 2

8. Therefore ICCA proposes amending sections 3.5.5 and 3.5.6 as follows (new text underlined):

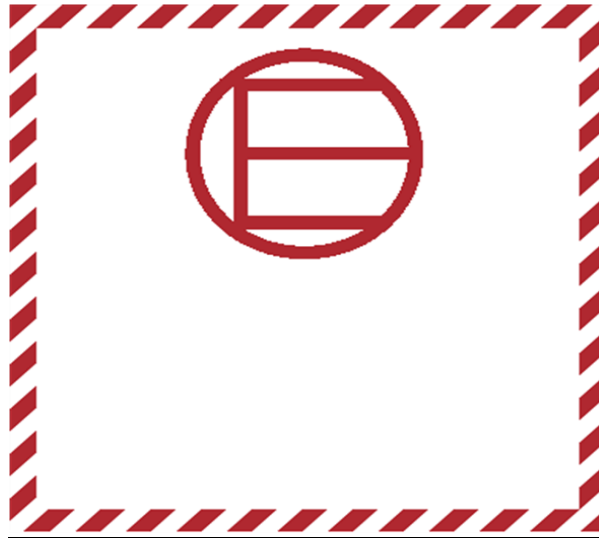
3.5.5 Maximum number of packages in any freight vehicle, railway freight wagon or multimodal freight container

~~The number of packages in any freight vehicle, railway freight wagon or multimodal freight container shall not exceed 1 000.~~

Any freight vehicle, railway freight wagon or multimodal freight container carrying dangerous goods in excepted quantities, on transport units with a maximum mass exceeding 12 tonnes, shall be marked in accordance with 3.5.2 on all four sides excepted when the container contains other dangerous goods for which placarding in accordance with 5.3, is required. The placard shall not include the class, or when assigned the Division number(s) or the name of the consignor or of the consignee.

The dimensions of the placard shall be a minimum of 200 x 200 mm.

Figure 3.5.2



Excepted quantities mark

Hatching and symbol of the same color, black or red,
on white or suitable contrasting background

3.5.6 Documentation

If a document (such as a bill of lading or air way bill) accompanies dangerous goods in excepted quantities, it shall include the statement “Dangerous Goods in excepted Quantities” and indicate the number of packages.
