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COMMITTEE OF EXPERTS ON THE  
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the  
Transport of Dangerous Goods  
(Sixteenth session,  
Geneva, 5-16 July 1999,  
agenda item 4)

TRANSPORT OF DANGEROUS GOODS DOCUMENTATION

Requirement to identify subsidiary risks on the transport document

Transmitted by the Expert from Canada

1. Column 4 of the Dangerous Goods List contains the 'class or division number of any important subsidiary risks'.
2. Article 5.2.2.1.2 states: Where articles or substances are specifically listed in the Dangerous Goods List, ... a subsidiary risk label shall be affixed for any risk indicated by a class or division number in Column 4 of the list, ...
3. Article 5.3.1.1.3 states: Placards shall be displayed for those subsidiary risks of substances or articles specified in Column 4 of the Dangerous Goods List.
4. Article 5.4.1.1.1 requires that the transport document shall contain ...
  - (a) The proper shipping name ...
  - (b) The class or, when assigned, the division ...
  - (c) The UN Number ... the packing group ...
  - (d) The total quantity of dangerous goods covered by the description ...

5. However this leaves a very important piece of information absent from the document. Even though a label or placard must be shown as indicated above to identify a subsidiary risk, it is acceptable under Article 5.4.1.1.1 for a transport document to not contain any indication of that subsidiary risk. This can leave a person attempting to match the placards or labels with items on the transport document, or a responder at the scene of an incident, in doubt as to why the label or placard is present, or to suspect that the transport document is not complete in listing all the dangerous goods being transported.

6. The subsidiary risk column was retained next to the Class or Division column in the Dangerous Goods List due to its role of identifying important subsidiary risks. The information contained in the first five important columns of the Dangerous Goods List is required to be contained in the transport document, except for the information from column 4 (subsidiary risk).

7. It is proposed to amend Article 5.4.1.1.1 by inserting after paragraph (b) a new paragraph (c), and renumber the remaining paragraphs accordingly, to read:

(c) **The entries in column 4 of the Dangerous Goods List in the row corresponding to the proper shipping name, which shall be enclosed in parenthesis;**

8. It is proposed, as a consequential amendment, that the words ‘**subsidiary risk**’ be inserted following the word ‘class’ in the second line of 5.4.1.2.2.

9. It is proposed, as a further consequential amendment, that the example at the conclusion of 5.4.1.2.2 be changed to read

**“ALLYL ALCOHOL 6.1 (3) UN 1098 I”**

10. Two further examples for illustration are:

**“BROMINE TRIFLUORIDE 5.1 (6.1, 8) UN 1745 I”**

read as: bromine trifluoride, division 5.1, subsidiary risks 6.1 and 8, UN Number 1745, packing group I.

**“SODIUM MONOXIDE 8 UN 1825 II”**

read as: sodium monoxide, class 8, UN Number 1825, packing group II.

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