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TRANSPORT OF DANGEROUS GOODS

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Transport of Dangerous Goods
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MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS
ON THE TRANSPORT OF DANGEROUS GOODS

Chapter 3.4 (Limited quantities)

Transmitted by the International Association of the Soap, Detergent
and Maintenance Products Industry (AISE)

Introduction

At the 15th Session AISE presented a paper ST/SG/AC.10/C.3/1998/65 to promote discussion and possible revision of the conditions for Limited Quantities. At that session, although opinions were divided on several of the issues raised, there was some support for further discussion.

The **marking of packages** for goods other than in Limited Quantities is sufficiently consistent internationally to avoid changes to marking when goods are put into local distribution systems but goods shipped under Limited Quantities encounter quite significant variations, yet these are the very packages which are most likely to be redistributed.

This paper seeks to address the problems which are caused by variations in package marking requirements in regional and national regulations and to encourage a confirmation of, or a revision of, the Model Regulations so that efforts can then be addressed to align modal and national regulations.

Proposal 1

Para. 3.4.6 Revise to read:

Packages should be marked with the UN Number(s) and Proper Shipping Name(s) of the contents but need not display hazards warning labels.

Packages containing more than one named substance may be marked [LQ followed by the Class Numbers and Divisions]. (e.g. UN LQ /3)

Justification

The IMDG Code permits the use of “Dangerous Goods in Limited Quantities” followed by the Class reference but this presents language problems for international transport.

RID and ADR for the European Region have adopted the use of the UN Numbers or “LQ” set in a diamond outline to overcome the difficulty of language but this has led to difficulties when goods are consigned for distribution in other parts of the world. It is also impractical for application by printing on shrink or stretch-wrapped trays permitted in 3.4.3 and leads to the addition of labels to the wrapping material which interferes with its recycling as waste.

It is claimed that the diamond is necessary for the easy identification of the contents by the emergency services. If this claim is justified in Europe, it may presumably be equally justified worldwide.

It is understood that different marking requirements may apply in individual regions or countries. If this is so, perhaps they could be identified and considered.

Proposal 2

3.4.8 should either;

- a) be replaced by a general small quantity exemption from marking, and labelling, or
- b) be deleted

Justification

3.4.2 requires that packagings shipped under Limited Quantity provisions, including those covered by 3.4.8, “shall meet the provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8 and so designed that they meet the construction requirements of 6.1.4”.

3.4.3 also applies the conditions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8 to shrink-wrapped and stretch-wrapped trays.

It is difficult to understand the difference in risk during transport between goods intended for “personal or household use” and goods which may be used professionally if the packaging standards are identical. 3.4.8 also refers to such product intended or suitable for sale through retail agencies.

The main difference between goods offered on the retail market and those offered for industrial use is, in some parts of the world, confined to the user marking but there is no certainty that the same conditions apply universally. There are, no doubt, some places where all products would be “suitable for sale through retail agencies”. When such goods are consigned, is a decision to apply 3.4.8 based on the consignor or the consignee country.

If there is no difference in risk, the exemption should apply to all packages under Limited Quantities.

If 3.4.8 is meant to take account of the package size which may, generally be quite small for the retail market, then it is suggested that an exemption size limit should be applied. Such an exemption is exemplified in Special Provision 190 referring to UN1950 Aerosols).
