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**COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS**
Sub-Committee of Experts on the
Transport of Dangerous Goods
(Seventeenth session,
Geneva, 6-17 December 1999,
agenda item 4)

TRANSPORT OF DANGEROUS GOODS DOCUMENTATION

**Transmitted by the European Confederation of Paint, Printing Ink
and Artists Colours Manufacturers Association (CEPE)**

Background

At the sixteenth session of the Sub-Committee, paper ST/SG/AC.10/C.3/1999/37 was submitted by CEPE to update the Sub-Committee on its work regarding the harmonisation of Dangerous Goods Transport Documentation provisions.

In line with its advised intention in paper ST/SG/AC.10/C.3/1999/37, CEPE is submitting this paper to advise the progress made. CEPE has collated information on the relevant documentary provisions of the 1999 modal regulations which has been circulated to the expert members of the Sub-Committee, Modal bodies and other interested parties. They were invited to review these provisions and advise CEPE as to their considered views on the importance of each provision by categorising them as follows:

1. Essential
2. Useful but not essential
3. Serves no practical useful purpose.

In the responses that have been received a fourth category has been added by respondees as follows:

4. Not applicable

A statistically significant number of responses has already been received, and CEPE has collated these responses in the Annex to this paper. Further responses have been advised and are expected, and it is the intention of CEPE to submit an INF paper nearer to the date of the meeting to provide more up to date information. If sufficient replies are received, it is the intention of CEPE to provide this information in the form of a table broken down by the different parties in the transport chain. It is already apparent from the replies so far received that the importance attached to different documentary provisions varies according to the functions of the party in the transport chain.

CEPE considers it advisable to await further responses as a sounder basis for formulating and submitting substantive proposals for the revision of Chapter 5.4 of the Model Regulations.

There are a number of issues arising directly from the compilation of the documentary provisions undertaken by CEPE and from the responses received so far on which CEPE seeks the guidance of the Sub-Committee.

- (a) Many of the documentary provisions are not contained in Chapter 5.4 or their equivalents in the modal regulations. Should all documentary provisions be consolidated in Chapter 5.4?
- (b) From the responses so far received it would appear that a significant number of existing documentary provisions serve no apparent useful purpose. The Sub-Committee are invited to consider this;
- (c) From the replies so far received the UN Number is considered to be the most important item of information by those respondees who have indicated their views on this. The Sub-Committee are invited to consider the implications of this;
- (d) Amongst comments submitted have been suggestions that an emergency response telephone number would be a useful addition to the transport document. The Sub-Committee are invited to consider this;
- (e) Amongst the comments that have been submitted by those involved in emergency response, have been suggestions that for Division 6.1 substances that the indication of an inhalation hazard would be useful in the transport document. The Sub-Committee are invited to consider this.

CEPE considers that the offer by FIATA in paper ST/SG/AC.10/C.3/1998/36 to host an informal working group, could be a suitable mechanism to consider the responses received and elaborate a formal document for the revision of chapter 5.4 for the eighteenth session of the Sub-Committee in July 2000. This should be based on the responses received and any guidance proffered by the Sub-Committee on the points raised above.

In the Annex to this paper CEPE has consolidated the responses received indicating the importance of each documentary provision by indicating in the four end columns the number of responses received. The headings of these columns as "1", "2", "3" or "4" correspond to the category of importance as:

1. Essential
2. Useful but not essential
3. Serves no practical useful purpose
4. Not applicable

This Annex does not contain responses referring to class specific provisions, where the responses so far have been limited, except that class 7 provisions should be retained in their entirety.

ANNEX

A –Information concerning the Dangerous Goods

	REQUIREMENT	UNMRTDG	COMMENTS	1	2	3	NA
A1	The Proper Shipping Name (PSN)	5.4.1.1.1(a)		8			
A2a	The Class or Division	5.4.1.1.1(b)		8			
A2b	The Class Name (Optional in IMDG)			2	3		
A3a	The UN Number	5.4.1.1.1(c)		1	2	1	
A3b	- preceded by the letters 'UN'	5.4.1.1.1(c)					
A4a	The packing group where assigned	5.4.1.1.1(c)		6			
A4b	RID/ADR letter (packing group)		In restructured RID/ADR will align with UN Model Regulations	1		1	1
A5	RID/ADR item number		In restructured RID/ADR will align with UN Model Regulations	1		2	1
A6	The initials 'RID' or 'ADR'				1	2	1
A7	The minimum flash point if 61 °C or below				2		2
A8	Subsidiary hazards not indicated in the Proper Shipping Name			2	2		1
A9	If applicable the words 'Marine Pollutant'			2		1	2
A10	Shipment type – Radioactive Yes/No					1	3

Indication of the most important items of dangerous goods information in order of importance

The majority of respondents so far providing this information have considered the UN Number to be the most important single item of information, with only one respondent considering the Proper Shipping name to be more important. The other items of information named as important are the proper shipping name, packing group, primary hazard class and subsidiary hazards. One respondent included the requirement for the IMDG Code Classification as a Marine Pollutant

B –Information concerning the Packages and volumes of dangerous goods

	REQUIREMENT	UNMRTDG	COMMENTS	1	2	3	NA
B1	Packing Instruction number			1		3	2
B2	The number of packagings or IBC's.			4	2		
B3	The description of the packagings or IBC's. (Some modes require this in different formats)			3	3		
B4a	The total quantity of dangerous goods covered by each description (by volume or mass); or the total quantity of dangerous goods in the whole shipment.	5.4.1.1.1(d)		4	3	1	
B4b				1	2	2	2
B5	When there is a maximum quantity limit per package, the net quantity per package.					2	2
B6	The words 'Overpack Used' if applicable					2	2
B7	For chemical kits and first aid kits, the total net quantity of dangerous goods					2	2
B8	Q value to 1 dec. place (Air Transport if applic)					1	3

Indication of whether the information on the number of packages is required for each Dangerous Goods Description or the Whole Consignment

The majority of respondees have indicated that this should be provided for each dangerous goods description only, although one respondee indicated that it should only be provided for the whole consignment, and one respondee indicated that it should be provided for both.

Indication of whether the information required on the quantity or volume of dangerous goods is required for each Dangerous Goods Description or the Whole Consignment

The majority of respondees have indicated that this should be provided for each dangerous goods description only, although one respondee indicated that it should only be provided for the whole consignment, and two respondees indicated that it should be provided for both.

Indication of the manner in which the description of the packages should be made

All the responses to this question so far have indicated that an abbreviated packaging description is required

C1 - Supplementary Information – The Dangerous Goods

	REQUIREMENT	UNMRTDG	COMMENTS	1	2	3	NA
C1-1	For a specifically named solution or mixture or one containing a hazardous component but not meeting the criteria for classification, the optional use of a declaration 'NOT GOODS OF CLASS X.Y' where X = Class and Y = Division			1	1	3	2
C1-2	For solutions or mixtures containing only one hazardous component, the use of the word 'SOLUTION' or 'MIXTURE' to supplement the proper shipping name			1	3	1	
C1-3	For dangerous goods being transported at an elevated temperature, the word 'HOT' preceding the proper shipping name where the hazard is not adequately identified in the PSN.	5.4.1.1.4		2		3	2
C1-4	For solids being transported in the molten state if it is not already part of the proper shipping name, the use of the word 'MOLTEN' in the proper shipping name.			2	2	2	
C1-5	For waste dangerous goods (other than radioactive waste) being transported for disposal, or for processing for disposal, the word 'WASTE' preceding the proper shipping name.	5.4.1.1.3			4	3	
C1-6	If in RID Appendix VIII a hazard identification code mark is required for bulk transport or for full wagon loads of packages containing one a single substance, the description of the goods shall be preceded by the hazard identification number.			1		2	2

C2 – Supplementary Information - Packaging

	REQUIREMENT	UNMRTDG	COMMENTS	1	2	3	NA
C2-1	For dangerous goods transported according to the exceptions for dangerous goods packed in limited quantities, then the words 'LIMITED QUANTITY' or 'LTD QTY' to be included in the description of the consignment.	5.4.1.1.8		1	2	3	1
C2-2	For dangerous goods transported in salvage packagings, the words 'SALVAGE PACKAGE' to be added after the description of the goods in the transport document.	5.4.1.1.9			3	3	
C2-3a	For empty uncleaned packagings or IBC's, (or portable tanks or road or rail transport tanks) containing the residue of dangerous goods of other than Class 7, the words 'EMPTY UNCLEANNED' or 'RESIDUE LAST CONTAINED' shall be added to the proper shipping name.	5.4.1.1.10		1	4	1	
C2-3b	When Empty Uncleaned Packagings are carried under RID/ADR, special item numbers are allocated in each class and the Description of the goods shall conform to the name given e.g. 'Empty Packagings 3, 71°, ADR'			2		3	1
C2-3c	When Empty Tanks etc for carriage in bulk under RID/ADR are empty and uncleaned, the words 'LAST LOAD' shall be added to the name of the last load			1		2	1
C2-4	Competent Authority approval for the transport of			1	1	1	1

D – Declarations, Certificates and Emergency Response Information

	REQUIREMENT	UNMRTDG	COMMENTS	1	2	3	NA
D1	Consignors Certificate/Declaration of Conformity;- A Certificate/Declaration from the consignor that the consignment offered can be accepted for transport, using the following text :- 'I hereby declare that the contents of this consignment are fully and accurately described by the proper shipping name, and are classified, packaged, marked and labelled/ placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations'. Refer also to IAEA Safety Standards Series ST-1 Paras. 552 and 553 for Class 7.	5.4.1.1.11		1	1	3	1
D2	Certification, by whoever supervises the packing of dangerous goods into a freight container, that the container is fit, packages correctly marked/labelled/placarded/stowed etc. (commonly referred to as the 'Container Packing Certificate').	5.4.2		1	2	3	
D3	Declaration that Carriage is in conformity with the provisions of other modal regulations for multi-modal transport				2	2	
D4	Declaration for exempt loads					2	2
D5	Declaration for 'piggyback' rail transport			1		2	1
D6	A Weathering Certificate if applicable					3	2
D7	A Certificate of Exemption if applicable			1		2	1
D8	A declaration regarding fumigation if applicable			1		2	1
D9	Competent Authority Approval Certificates			1	1	1	1
D10	Emergency response information;- Appropriate information shall be immediately available at all times for use in emergency response to accidents/incidents involving dangerous goods in transport.	5.4.3.1	2 respondents commented that an emergency telephone contact number would be useful or important	5	2		1

E – Consignment or other Information

	REQUIREMENT	UNMRTD G	COMMENTS	1	2	3	NA
E1	Page number of total pages				1	2	1
E2	Consignor – Name and Address			6			
E3	Consignee – Name and Address			6			
E4	For shipments to/through the USA, a 24 hour emergency response telephone number					4	1
E5	Passenger/Cargo aircraft if applicable			2		1	1
E6	Port/Airport of departure			1		2	1
E7	Port/Airport of destination			1		2	1
E8	Destination Station - Name			2		1	
E9	List of Customs or other Documents attached				2	2	1
E10	Airwaybill number			1	2		1
E11	Air: Special Provision number if A1, A2, A109				2		1
E12	Special handling information if applicable				2	1	1
E13	Tare of the Wagon and wagon number			1	1	2	