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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

<u>Sub-Committee of Experts on the</u> <u>Transport of Dangerous Goods</u> (Eighteenth session, 3-14 July 2000, agenda item 5 (a))

MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Listing and classification

Proposition to revise the classification of two new generic chlorosilanes

Transmitted by the European Chemical Industry Council (CEFIC)

1. **INTRODUCTION**

During the 16th session of the Sub-Committee in July 1999, the expert from the United States of America proposed:

- (a) to revise the classification of two existing entries i.e. Silicon Tetrachloride UN 1818 and Propyltrichlorosilane UN 1816 moving those products from Class 8 PG II to Class 6 PG II; and
- (b) to create, in that respect, two new n.o.s. entries Chlorosilanes Toxic Corrosive n.o.s. and Chlorosilanes Toxic Corrosive Flammable n.o.s. to be classified also in Class 6.1.

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- 2. The first part of the proposal to move the two existing entries from Class 8 to Class 6 was not carried. The arguments that lead to such a decision were as follows:
 - (1) The hazard related to the inhalation of the vapour of these products are related to the corrosiveness of the HCl generated when the vapours are coming in contact with humid living tissues.
 - (2) The safety benefits resulting from this change of classification were not demonstrated.
- **3.** The second part of the proposal i.e. the introduction of two new generic chlorosilanes entries in Class 6.1 was submitted to a vote separately and surprisingly carried in somewhat confusing conditions. If a decision is made to maintain the existing chlorosilanes entries in Class 8, the introduction of new generic chlorosilanes entries in Class 6.1 seems indeed illogical when other generic chlorosilanes entries are maintained in Class 8 (UN 2986 UN 2987).
- 4. As a result, similar products presenting the same hazards are now allowed to be classified in two different classes. Such a confusing prescription is detrimental to the image of the model regulation and to safety in general.

PROPOSAL

Delete the 2 new generic entries:

3361	CHLOROSILANES,	6.1	8	II	109	NONE	P001	T11	TP2
	TOXIC, CORROSIVE,						IBC 01		TP13
	N.O.S.								
3362	CHLOROSILANES,	6.1	3,8	II	109	NONE	P001	T11	TP2
	TOXIC, CORROSIVE,						IBC 01		TP13
	FLAMMABLE, N.O.S.								