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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

Twenty-fifth session, 5-14 July 2004
Item 5 of the provisional agenda

DANGEROUS GOODS PACKED IN LIMITED QUANTITIES

Comments on ST/SG/AC.10/C.3/2004/44

Transmitted by the expert from Belgium

1. In the last few months, experts of the Sub-Committee have received many e-mails regarding the above subject. They reflect very diverging opinions. It is clear that the discussion on this topic will have to be very well structured in order to obtain results.

2. There are still several basic points where differences of opinion exist. Because these are interrelated it is impossible for the Sub-Committee to restrict itself to a simple choice between OPTION 1 and OPTION 2 of the Canadian/French document.

3. OPTION 1 differentiates between "dangerous goods packed in small quantities suitable for retail sale" and the other "dangerous goods packed in small quantities" whilst OPTION 2 does not. This is a basic decision to be made. The expert from Belgium is of the opinion that there should be no differentiation, for the following reasons:

   (a) The inherent properties of "retail" and "non-retail" shipments are the same;
   (b) There is no clear definition of "retail sale", let alone of "suitable for retail sale".

4. In OPTION 1, UN No. 8000 is only used for the "dangerous goods packed in small quantities suitable for retail sale"; the other "dangerous goods packed in small quantities" make use of their own UN number. In OPTION 2, where the retail sale aspect is not taken into account, UN 8000 is introduced for all "dangerous goods packed in small quantities". It is clear that here another basic choice could have been made : not to introduce UN 8000 at all. Before going into the proposed text any further, this basic point should be discussed and decided upon. In the discussion the arguments put forward in 5. should be taken into account.

5. The only information given by UN 8000 is: “here dangerous goods packed in small quantities are present”. This information alone is insufficient for emergency purposes. In the Canadian/French document this difficulty has been overcome in the proposed 3.4.7 where the indication of the class, including subsidiary risk, is required in an alternate document. Belgium is of the opinion that the class and the subsidiary risk are the very minimum and that more (e.g. the UN number of the substances themselves) would be preferable.

6. Section 3.4.7 of the Canadian/French document indicates that an alternate document may replace the transport document described in 5.4.1 and specifies its content. However, according to 5.4.1, “a dangerous goods transport document may be in any form, provided it contains all of the information required by these Regulations”. Therefore, it would be much more user-friendly simply to specify in 3.4.7 that the transport document only has to contain the information mentioned in this section.

7. Section 3.4.9 of the Canadian/French document indicates that “transport units” with more than a certain mass (still to be determined) of “dangerous goods packed in small quantities” shall be marked with UN 8000 within a white diamond. This proposal leaves out a very important aspect of limited quantity transports that still needs to be decided upon: is it necessary to impose a limit to the total amount of dangerous goods packed in small quantities that is allowed per “transport unit”? The study undertaken by France some time ago (ST/SG/AC.10/C.3/2002/47) clearly indicates that the behaviour of dangerous goods in accident situations (fire, etc.) is not improved very much by using small combination packagings. This can only lead to the conclusion that a limit is necessary to the total amount of dangerous goods packed in small quantities that is allowed per “transport unit”. Moreover, Belgium is of the opinion that - because of the safety considerations mentioned above - this limit should not be too high and proposes 1000 kg.

8. If such a limit per “transport unit” is introduced, their marking with UN 8000 within a white diamond does no longer seem necessary. This point is to be discussed and decided upon.

9. If the Sub-Committee should nevertheless decide to impose such a marking, it should not differ unnecessarily from the normal labelling and marking provisions for “transport units”.

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