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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

Thirty-first session
Geneva, 2-6 July 2007
Item 6 of the provisional agenda

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS
ON THE TRANSPORT OF DANGEROUS GOODS**

Definition of (cargo) transport unit

Transmitted by the expert from Australia

SCOPE

This proposal aims at recommending that a definition of '(cargo) transport unit' be incorporated into section 1.2.1 of the UN Model Regulations.

RELATED DOCUMENTS

Informal documents:

UN/SCETDG/26/INF.40 - (Australia) definition of Transport Units and Closed Transport Units.

UN/SCETDG/28/INF.28 - (Australia) definition of (Cargo) Transport Units.

UN/SCETDG/28/INF.30 - (Australia) definition of Closed (Cargo) Transport Units.

Official documents:

ST/SG/AC.10/C.3/2005/3 - (Australia) Definition of Transport Units and Closed Transport Units.

ST/SG/AC.10/C.3/52 – Report of the Sub-Committee of Experts on its 26th session.

ST/SG/AC.10/34/Add.1 – Report of the Committee of Experts on its 3rd session.

ST/SG/AC.10/C.3/54 – Report of the Sub-Committee of Experts on its 27th session.

ST/SG/AC.10/C.3/58 – Report of the Sub-Committee of Experts on its 28th session.

Introduction

1. During the 28th session, the expert from Australia presented UN/SCETDG/28/INF.28 and UN/SCETDG/28/INF.30 in regard to use of the definitions, 'Transport unit' and 'Closed transport unit'. As noted in paragraph 82 of the report (ST/SG/AC.10/C.3/58), the expert from Australia was asked to make a formal submission in this regard after requesting feedback from other experts. Limited feedback has been received since the 28th session, however two issues have persisted since this matter was first raised by Australia in the 26th session (ST/SG/AC.10/C.3/2005/3):

- (a) Some experts consider that the term 'Cargo Transport Unit' used in the IMDG Code would provide consistency and avoid confusion with the term 'Transport unit' used in ADR with a different meaning;
- (b) Others experts have expressed concern with the second sentence of the proposal put forward in ST/SG/AC.10/C.3/2005/3, "Transport units with fabric sides or tops are not closed transport units", due to ADR and RID using other terms such as, 'open', 'closed', and 'sheeted'.

In view of these two distinct concerns, the issues have been divided into two separate papers to allow them to progress independently. This paper deals with including the definition of '(Cargo) Transport Unit' in section 1.2.1 of the Model Regulations and differentiating the generic term from that used in the ADR.

Issue

2. The term 'Transport unit' is only defined in 5.3.1.1.1 of the UN Model Regulations. "Transport unit" is not referenced in section 1.2.1 as is the case for most other definitions used throughout the regulations. In this respect the expert from Australia notes that in the IMDG code and the ADR, the definition of "Transport unit" is only contained in section 1.2.1. The term 'Cargo transport unit' is used in the IMDG code.

3. As noted in UN/SCETDG/28/INF.28 the term 'Transport unit' is defined only in 5.3.1.1.1 of the UN Model Regulations but is widely used in both volumes of the Model Regulations. Table 1 (copied from ST/SG/AC.10/C.3/2005/3) indicates where the term "Transport unit" has been used in the 14th edition of the Model Regulations and changes adopted in ST/SG/AC.10/34/Add.1 for the 15th edition. It also shows where the term "Cargo transport unit" has been used in lieu of "Transport unit". There appear to be no inconsistencies in the employment of the term "Transport Unit" (or "Cargo transport unit") between any of these references.

Table 1: References to “Transport unit” and “Cargo transport unit”

| Volume | Reference to “Transport unit” and “Cargo transport unit” |
|-----------------|--|
| Volume 1 | Para 11 and 12 of the introduction 2.4.2.3.2.4.(b).(ii); 2.5.3.2.5.1.(b) SP172, SP216, SP217, SP218, SP232 (see note 1), SP297, SP299 (see note 2) and SP335 |
| Volume 2 | 4.1.1.1 and 4.1.3.8.1.(a); 4.1.2.3 (see note 2), P001 Special packing provision PP1 (see note 3), P002 Special packing provisions PP7 and PP12 (see note 2), P002 Special packing provision PP37 (see note 3), P002 Special packing provision PP38 (see note 3), P410 – Note ‘d’ (see note 2), P900 (see note 2), P650, P906 (see note 1) IBC Special packing provisions B1 and B2 (see note 2), 5.2.1.7.3; 5.3.1.1.1; 5.3.1.1.2, 5.3.1.1.3; 5.3.1.1.4; 5.3.2.1.1, 5.3.2.2; 5.3.2.3.1 6.7.5.2.1; 7.1.1.3; 7.1.1.4, 7.1.1.5; 7.1.1.6; 7.1.1.7, 7.1.1.9, Note 2 to 7.1.1.9 (see note 1) 7.1.3.1.3; 7.1.4.1; 7.1.4.3.2.1, 7.1.4.3.2.2; 7.1.6.1.1; 7.1.6.1.2, 7.1.6.2.3; 7.2.4.4 |

Note 1: The term ‘Cargo transport unit’ was used in this reference in lieu of ‘Transport unit’.

Note 2: The term is used with ‘Closed transport unit’

Note 3: The term ‘Closed cargo transport unit’ was used in this reference

Proposal No. 1

4. Noting the previous discussions on this issue and that definitions used throughout the Model Regulations are normally contained in section 1.2.1, it is recommended that the following definition of “Transport unit”, modified from the text of section 5.3.1.1.1 of the Model Regulations, be included in section 1.2.1 of the Model Regulations (modifications in bold text):

*“Transport **unit**: means a road transport tank or freight vehicle, a railway transport tank or freight wagon, or a multimodal freight container or portable tank”.*

5. It is further recommended the definition of *Transport unit* in section 5.3.1.1.1 be deleted.

Proposal No. 2

6. Noting the comments made by experts during the 27th session in respect of the need to avoid confusion with terms used in the ADR, noting the use of the term ‘Cargo transport unit’ in lieu of “Transport unit” in the Model Regulations and noting the advantages of harmonising with

the IMDG code, it is recommended that the term ‘Cargo transport unit’ be adopted in lieu of “Transport unit” throughout the text of the Model Regulations.

7. If adopted, the references in Table 1 will need to be modified to read “Cargo transport unit” in lieu of “Transport unit”. In addition the wording in proposal one would need to be amended to read:

“Cargo transport unit: means a road transport tank or freight vehicle, a railway transport tank or freight wagon, or a multimodal freight container or portable tank”.
