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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-third session
Geneva, 30 June-9 July (a.m) 2008
Item 7 of the provisional agenda

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

Comments on ST/SG/AC.10/C.3/2008/6

Transmitted by the expert from Canada^{*}

1. The expert from Canada recognizes the difficulties outlined in ST/SG/AC.10/C.3/2008/6 from VOHMA. The proposal from VOHMA raises a number of issues including the need for technology that can link the count of inner packagings to specific packages, whether or not knowing the type, number or capacity of each inner packaging would enhance safety, and whether or not this added information would enhance or change emergency response.

2. Section 5.4.1.5.1 in the Model Regulations and the corresponding section in the IMDG Code (Amendment 33-06) require the number and kind of "packages" to be indicated on the transport document. "Package" is defined in the Model Regulations as "... the complete product of the packing operation, consisting of the packaging and its contents prepared for transport.". It

^{*} In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.3/60 para. 100 and ST/SG/AC.10/C.3/34, para. 14).

would seem fairly clear, then, that the Model Regulations and the IMDG Code are not requiring an indication of the type, number and capacity of "inner packagings".

3. The example form at the end of Chapter 5.4 includes an asterisk at the heading

"#Number and kind of packages; description of goods"

which leads the reader to the note

"*FOR DANGEROUS GOODS: you must specify: UN number, proper shipping name, hazard class, packing group (where assigned) and any other element of information required under applicable national and international regulations."

4. Given what appears to be a clear requirement, it would seem reasonable for the Sub-Committee to know why additional information is being required. Are some national authorities requiring additional information through legislation or other means, as they are entitled to do if they deem that information to be necessary? Is there confusion as to what the Model Regulations and the IMDG Code require?

5. If national legislation is the reason then action by the Sub-Committee may not help. If there is confusion, a clarification could be issued to each competent authority under the aegis of the International Maritime Organization (IMO) in which case they would not need to consider changes to the Model Regulations at this stage.

Proposal

6. The expert from Canada is not fully supportive of adding to the Model Regulations text indicating what is not required. However, if the Sub-Committee decides to adopt the proposal by VOHMA, the expert from Canada proposes that the text be clarified as follows:

"The number, type, and capacity of each inner packaging within the outer packaging of a combination packaging ~~need not be indicated~~ is not required to be indicated."

The expert from Canada believes that the words "need not be indicated" are open to interpretation.

7. The expert from Canada suggests that the example form at the end of Chapter 5.4 be deleted, as it seems to cause more difficulties than it solves, or revised and updated to ensure that it is a multi-modal form and appropriate for electronic use. VOHMA raised issues related to this form in previous meetings.
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