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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-fourth session
Geneva, 1-9 December 2008
Item 4 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Provisions applicable to UN 1845

Transmitted by the International Air Transport Association (IATA)[1]

Introduction

1. UN 1845, CARBON DIOXIDE, SOLID (DRY ICE) is shown in the Dangerous Goods List with Packing Group III assigned in column 5 and Special Provision 297 assigned in Column 6. In general terms the packing group assigned for a substance serves two purposes; the packing group identifies the degree of danger that the substance represents and in most cases the packing group determines the performance level of the packaging for the substance.

[1] 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.10/34, para. 14) (routine listing and classification)

2. For dry ice it could be argued that neither purpose applies as dry ice poses minimal risk during transport unless in a confined space where carbon dioxide gas concentrations may pose a risk to persons entering the confined space. In addition there is no requirement for performance packagings as packing instruction P003 requires the use of packagings that permit the release of carbon dioxide gas.

3. With respect to SP 297, the third paragraph except dry ice from the shipping paper requirements, but only if the substance being refrigerated is used for diagnostic or treatment purposes. This condition does not align with the general exemption from the documentation requirements provided in the ICAO Technical Instructions for dry ice when used as a refrigerant for non dangerous goods. In addition the term “shipping paper” is not used in the Model Regulations; “transport document” or “dangerous goods transport document” is the recognised terminology.

4. The combination of these two issues means that the packing group for dry ice will be shown on the dangerous goods transport document when dry ice is used as a refrigerant for dangerous goods, but where the conditions of SP 297 are met, no packing group information will be communicated.

5. For air transport this difference creates uncertainty with respect to the written information that the airline must provide to the Pilot-in-Command. With the packing group being provided, or not, depending on the circumstances.

Proposal 1

6. Delete the packing group shown against the entry for UN 1845 in the Dangerous Goods List as shown:

(1)	(2)	(3)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9)	(10)	(11)
1845	CARBON DIOXIDE, SOLID (DRY ICE)	9		~~III~~	297	0	E0	P003	PP18		

Proposal 2

7. Revise the text of Special Provision 297 to remove specific reference to diagnostic or treatment purposes as follows:

> 297 For air transport, arrangements between consignor and operator(s) shall be made for each consignment, to ensure that ventilation safety procedures are followed.
>
> Transport units containing solid carbon dioxide, when transported on board ocean vessels, shall be conspicuously marked on two sides “WARNING CO2 SOLID (DRY ICE)”. Other packagings containing solid carbon dioxide, when transported on board ocean vessels, shall be marked “CARBON DIOXIDE, SOLID-DO NOT STOW BELOW DECK”.

Carbon dioxide, solid (dry ice) is excepted from the ~~shipping paper~~ documentation requirements of Chapter 5.4 when the dry ice is used as a refrigerant for other than dangerous goods, ~~if~~ provided the package(s) is marked “Carbon dioxide, solid” or “Dry ice” ~~and is marked with an indication that the substance being refrigerated is used for diagnostic or treatment purposes (e.g., frozen medical specimens)~~.

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