



**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****Forty-first session**

Geneva, 25 June – 4 July 2012

Item 3 (a) of the provisional agenda

Listing, classification and packing:**Proposals of amendments to the list of dangerous goods of Chapter 3.2****Special provisions requiring reconsideration****Transmitted by the Dangerous Goods Advisory Council¹****Introduction**

1. At the fortieth session as part of the discussion on DGAC's proposal (ST/SG/AC.10/C.3/2011/22) to amend Special Provision 135 to take account of the introduction of criteria for environmentally hazardous substances, DGAC was asked to provide a document identifying other substances that may be similarly affected by the introduction of Environmentally Hazardous Substance (EHS) criteria. DGAC agreed to carry out a preliminary analysis to provide a basis for further work by the Sub-Committee in this area.

2. In general, similarly affected substances are considered to be those which are assigned a special provision indicating the substance is not subject to the regulations (e.g., "This substance is not subject to the Regulations when ..."). It is possible that the classification status of some substances assigned this type of special provision may have changed due to the introduction of EHS criteria.

3. In addition consideration should be given to:

- SP 223 to the extent that it takes account of EHS criteria. In particular, whether EHS criteria are "defining criteria of a Class or Division"; and

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

- SP 276 to clarify whether EHS criteria take precedence in the case of Aviation Regulated Liquid or Solid entries (UN 3334, 3335).

Discussion

4. The relevant special provisions and the substances to which they are linked are provided in the annex. Many of the special provisions indicate a substance or range of concentrations of substances is not subject to the Regulations. It will not always be possible to ascertain whether these substances do or do not meet the EHS criteria. In these instances it may be appropriate to add to the special provision qualifying text such as “provided the substance does not meet the criteria.”

5. The Sub-Committee is invited to take note of the list in the annex and decide upon an appropriate course of action.

List of special provisions and relevant substances potentially requiring revision based on the introduction of EHS criteria

1. SP 32 “This substance is not subject to these Regulations when in any other form.”
Assigned to: UN 1346 Silicon Powder Amorphous
2. SP 37 “This substance is not subject to the Regulations when coated.”
Assigned to: UN 1398 Aluminium Silicon Powder Uncoated
3. SP 38 This substance is not subject to these Regulations when it contains not more than 0.1% calcium carbide.
Assigned to: 1403 Calcium Cyanamide with more than 0.1% calcium carbide
4. SP 39 This substance is not subject to these Regulations when it contains less than 30% or not less than 90% silicon.
Assigned to: UN 1408 Ferrosilicon with 30% or more but not more than 90% silicon
5. SP 45 Antimony sulphides and oxides which contain not more than 05% of arsenic calculated on the total mass are not subject to these Regulations.
Assigned to: UN 1549 Antimony Compound, Inorganic, Solid, NOS; UN3141 Antimony Compound, Inorganic, Liquid, NOS
6. SP 47 Ferricyanides and ferrocyanides are not subject to these Regulations.
Assigned to: UN 1588 Cyanides, Inorganic, Solid, NOS
7. SP 59 These substances are not subject to these Regulations when they contain not more than 50% magnesium.
Assigned to: UN 1869 Magnesium or Magnesium alloys with more than 50% magnesium in pellets turnings or ribbons.
8. SP 62 This substance is not subject to the Regulations when it contains not more than 4% sodium hydroxide.
Assigned to: UN 1907 Soda Lime with more than 4% sodium hydroxide
9. SP 65 Hydrogen peroxide aqueous solutions with less than 8% hydrogen peroxide are not subject to these Regulations.
Assigned to: UN 2984 Hydrogen Peroxide Solution with not less than 8% but less than 20% hydrogen peroxide
10. SP 66 Mercurous chloride and cinnabar are not subject to these Regulations.
Assigned to: UN 2024 Mercury Compound Liquid, NOS; UN 2025 Mercury Compound Solid, NOS
11. SP 138 P-Bromobenzyl cyanide is not subject to these Regulations.
Assigned to: UN 1694 Bromobenzyl Cyanides Liquid; UN 3449 Bromobenzyl Cyanides, Solid
12. SP 169 Phthalic anhydride...
Assigned to: UN 2214 Phthalic Anhydride with more than 0.05% maleic anhydride; UN 2698 Tetrahydrophthalic Anhydrides with more than 0.05% maleic anhydride

13. SP 177 barium sulphate is not subject to these regulations.
Assigned to: UN 1564 Barium Compounds NOS
14. SP 208 The commercial grade of calcium nitrate fertilizer, when consisting mainly of a double salt (calcium nitrate and ammonium nitrate) containing not more than 10% ammonium nitrate and at least 12% water of crystallization, is not subject to these Regulations.
Assigned to: UN 1454 Calcium Nitrate
15. SP 223 If the chemical or physical properties of a substance covered by this description are such that when tested it does not meet the established defining criteria for the class or division listed in Column 3 of the Dangerous Goods List of Chapter 3.2, or any class or division, it is not subject to these Regulations.
Assigned to: Multiple substances. Consideration should be given as to whether the text should be clarified with respect to EHS criteria. Some may consider EHS criteria as not being “defining criteria of a class or division”.
16. SP 226 Formulations of these substances containing not less than 30% non-volatile, non-flammable phlegmatizer are not subject to these Regulations.
Assigned to: UN 3251 Isosorbide-5-Mononitrate
17. SP 241 pertaining to nitrocellulose
Assigned to: UN 2557 Nitrocellulose with not more than 12.6% nitrogen by dry mass, Mixture With or Without Plasticizer, With or Without Pigment
18. SP 242 Sulphur is not subject to these Regulations when it has been formed to a specific shape (e.g. prills, granules, pellets, pastilles or flakes).
Assigned to: UN 1350 Sulphur
19. SP 249 Ferrocium, stabilized against corrosion, with a minimum iron content of 10% is not subject to these Regulations.
Assigned to: UN 1323 Ferrocium
20. SP 252 Provided the ammonium nitrate remains in solution under all conditions of transport, aqueous solutions of ammonium nitrate, with not more than 0.2% combustible material, in a concentration not exceeding 80%, are not subject to these Regulations.
Assigned to: UN 2426 Ammonium Nitrate Liquid (hot concentrated solution)
21. SP 271 pertaining to nitroglycerin / sugar mixtures
Assigned to: UN 0143 Nitroglycerin, Desensitized with not less than 40% non-volatile, water-insoluble phlegmatizer, by mass
22. SP 276 This includes any substance which is not covered by any of the other classes but which has narcotic, noxious or other properties such that, in the event of spillage or leakage on an aircraft, annoyance or discomfort could be caused to crew members so as to prevent the correct performance of assigned duties.
Assigned to: UN 3334 Aviation Regulated Liquid NOS; UN 3335 Aviation Regulated Solid NOS *Note the criteria for EHS do not take precedence so that multimodal disharmony in classification is possible.*
23. SP 305 These substances are not subject to these Regulations when in concentrations of not more than 50 mg/kg.

Assigned to: UN 2315 Poly-Chlorinated Biphenyls, Liquid; UN 3151 Poly-Halogenated Biphenyls, Liquid or Poly-Halogenated Terphenyls, Liquid; UN 3152 Poly-Halogenated Biphenyls, Solid or Poly-Halogenated Terphenyls Solid; UN 3432 Poly-Chlorinated Biphenyls, Solid

24. SP 332 Magnesium nitrate hexahydrate is not subject to these Regulations.

Assigned to: UN 1474 Magnesium Nitrate

Note: SP 117, 281, 299 (Fibres, Fish Meal, Cotton, etc) SP 141 (castor beans), 142 (soy bean meal), 144, 145 and 146 (alcoholic beverages), 168 (asbestos), 190 (aerosols), 191(receptacles small containing gas) were disregarded.