

**37<sup>th</sup> Session of the Sub-Committee of Experts  
on the Transport of Dangerous Goods (UNSCOE TDG)  
June 21-30, 2010  
Summary of Proposals and Draft US Positions**

*Note: This is the third of the TDG Sub-Committee's four meetings scheduled to be held during the 2009-2010 biennium. The purpose of this meeting is to consider amendments to the UN Recommendations on the Transport of Dangerous Goods, also known as the "UN Model Regulations". The amendments agreed to by the Sub-Committee during this biennium will be submitted for final consideration and approval at the 5<sup>th</sup> session of the UN Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals to be held in December, 2010. Once approved by the Committee, the amendments will be incorporated into the 17<sup>th</sup> Revised Edition of the UN Model Regulations and will be considered for adoption within the IMDG Code and ICAO TI from January 1, 2013.*

*UN papers may be obtained from the UN Transport Division website at: <http://www.unece.org/trans/main/dgdb/dgsubc/c32010.html>  
Visit the website of the Office of Hazardous Materials Safety's Director of International Standards at:  
<http://www.phmsa.dot.gov/hazmat/regs/international> for pertinent information relative to the office's international activities including: Schedules of International Meetings, The UN Committee and Sub-Committee of Experts on the Transport of Dangerous Goods, the International Atomic Energy Agency, the International Maritime Organization's Dangerous Goods, Solid Cargoes and Containers (DSC) Sub-Committee, the International Civil Aviation Organization (ICAO) Dangerous Goods Panel, the European Agreements Concerning the International Carriage of Dangerous Goods by Road (ADR) and Rail (RID), and the North American Free Trade Agreement (NAFTA) Hazardous Materials Land Transportation Standards Sub-Committee.*

<b>Paper #</b>	<b>Paper Title/Summary</b>	<b>Draft US Positions and Comments</b>
<b>DOCUMENTS RELATED TO CLASS 1 (Explosives)</b>		
<b>2010/8</b>	<i>6.1.4 Requirements for packagings - 4.1.4.1 Packing instructions concerning the use of packagings (Italy)</i> In this paper Italy proposes to authorize the use of metals other than steel or aluminium (for example titanium), for boxes and removable head drums for used to package explosive articles. This is a follow-up to Italy's proposal from the last session and more comprehensively addresses the issue taking into account comments received at the previous session. A number of amendments to the appropriate packing instructions are proposed.	We supported this proposal.  <b>Result:</b> The proposal was adopted with minor revisions for example the inclusion of a wood inner packaging authorization in a number of packing instructions.
<b>INF.5</b>	<i>Requirements for packagings - 4.1.4.1 Packing instructions concerning the use of packagings (Italy)</i>	

	INF. 5 contains a consolidated version of the packing instructions P001 to P804 showing the changes as proposed in 2010/8.	
<b>2010/29 INF.28</b>	<p><i>Criteria for excluding articles from Class 1 (USA)</i></p> <p>In this paper (replaced by INF.28) we note that Section 2.1.3.6.1 of the Model Regulations currently states that “The Competent Authority may exclude an article or substance from Class 1 by virtue of test results and the Class 1 definition.” Specific test criteria for exclusion of substances from Class 1 is addressed in sections 2.1.3.6.2 and 2.1.3.6.3 but no test criteria are given for exclusion of articles consistent with the definitions and general provisions in section 2.1.1.1 (b). We propose to include specific test provisions which include criteria to address rupture/fragmentation or movement, outer surface temperature, sound, and smoke obscuration.</p>	<p>U.S. Proposal</p> <p><b>Result:</b> The proposal was adopted with amendments (see UN/SCETDG/37/INF.73  <a href="http://www.unece.org/trans/doc/2010/ac10c3/UN-SCETDG-37-INF73e.doc">http://www.unece.org/trans/doc/2010/ac10c3/UN-SCETDG-37-INF73e.doc</a>)</p>
<b>2010/31</b>	<p><i>A proposed new DDT Test and Criteria for flash compositions (USA)</i></p> <p>At its thirty-fourth session, the Sub-Committee considered several papers regarding the HSL Flash Composition Test transmitted by the expert from the United Kingdom (see ST/SG/AC.10/C.3/2008/105 and informal documents INF.34 and INF.34/Add.1). The proposed new test was adopted for incorporation within the Manual of Tests and Criteria with accompanying changes to Note 2 to 2.1.3.5.5 of the Model Regulations. There appeared to be no other methods of quantifying various pyrotechnic compositions in terms of their explosive hazard readily adoptable at the time that the existing HSL Flash Composition Test was adopted. However, it was observed by several other experts that the test itself has a fairly large standard of deviation and requires an investment of hardware, electronic equipment and training which could be beyond the capabilities of some regulatory authorities in developing countries. It also does not provide sufficient discrimination between compositions such as finely divided black powder, which</p>	<p>U.S. Proposal</p> <p><b>Result:</b> The working group offered a number of comments and agreed to the proposed approach of conducting further validation testing to verify the appropriateness of the proposed alternative method. Several delegations expressed an interest in helping and in particular BAM offered their assistance in this regard. A revised proposal will be submitted in December taking into account the results of further testing and comments received.</p>

	has not been viewed as a typical flash composition by the pyrotechnics industry. This paper invites other members of the Sub-Committee Working Group on Explosives to comment on this proposal and conduct their own evaluations to see if the test method may have merit as an alternative to the current HSL Flash Composition Method. If the results can be supported in other countries and by other experts, a new formal paper may be submitted for consideration.	
<b>2010/40</b>	<i>Proposed modifications to Test Series 7 (UK/USA)</i> In this joint proposal with the UK, we note that in spite of the fact that few articles transported today can be classed Division 1.6 under existing TS 7 criteria, there coexists a number of newer substances and articles being developed and transported which have Division 1.6 characteristics although some of their specific features and individual designs do not exactly align with criteria. The overall insensitivity and safety in transport of those newer articles is believed to be equivalent with the intent of the originators of TS 7. Therefore, we propose modifications to the existing TS 7 definitions and test schemes to accommodate these new developments in article design and construction.	US Proposal  <b>Result:</b> The proposal was adopted with minor revisions (see UN/SCETDG/37/INF.73 <a href="http://www.unece.org/trans/doc/2010/ac10c3/UN-SCETDG-37-INF73e.doc">http://www.unece.org/trans/doc/2010/ac10c3/UN-SCETDG-37-INF73e.doc</a> )
<b>DOCUMENTS RELATED TO CLASS 2 (Gases)</b>		
<b>2010/9</b>	<i>Salvage pressure receptacles (Germany and the UK)</i> This paper proposes to add provisions to the Model Regulations for salvage pressure receptacles – i.e. pressure receptacles used to transport a leaking or damaged cylinder. The proposed text will be considered by a working group scheduled to meet during this session.	We supported including a basic framework for salvage pressure receptacles within the Model Regulations, recognizing that there is no need for the requirements to be overly prescriptive as such receptacles will continue to be authorized only on the basis of an approval by the competent authority.  <b>Result:</b> The proposal was sent to a working group that the United States participated in. The results of this working group appear in INF.81. The revised proposals were adopted.
<b>2010/19</b>	<i>Dynamic longitudinal impact testing of UN MEGCs, section 41.2.2 of the Manual of Tests and Criteria</i>	We supported this proposal. We have participated in the development of the proposed criteria and believe it to be

	<p><i>(CGA/EIGA/ITCO)</i></p> <p>This paper proposes to add permitted design variations for prototype impact testing of multiple element gas containers (MEGCs). The proposal was developed collaboratively by representatives from MEGC manufacturers, MEGC users, and impact test experts, in consultation with competent authorities. The authors of the paper state that the permitted design variations will not compromise the ability of a MEGC to contain safely both the elements and the lading under conditions specified in the impact test and are consistent with current impact test results and practices.</p>	<p>appropriate.</p> <p><b>Result:</b> The proposal was adopted.</p>
2010/20	<p><i>Proposals to update references to ISO standards (ISO)</i></p> <p>In this paper ISO notes that the standard ISO 11117:1998 ‘Gas cylinders – Valve protection caps and valve guards for industrial and medical gas cylinders – Design, construction and tests’ has been replaced by ISO 11117:2008 + Cor 1:2009 ‘Gas cylinders -- Valve protection caps and valve guards -- Design, construction and tests’. ISO proposes to update the reference accordingly and provide that valve protection caps and guards conforming to the previous standard be authorized until 31 December 2014.</p> <p>In addition ISO proposes to add the following reference after the reference to ISO 10297:2006 in the first table of 6.2.2.3:  ISO 13340:2001      Transportable gas cylinders – Cylinders valves for non-refillable cylinders – Specification and prototype testing.</p>	<p>We supported this proposal.</p> <p><b>Result:</b> The proposal was adopted.</p>
2010/24	<p><i>Proposal to include the requirements for pressure relief valve examination and testing in P203 (EIGA)</i></p> <p>In this paper EIGA notes that there is currently no specific requirement in relation to the frequency of periodic inspections of PRDs on closed cryogenic receptacles. EIGA proposes to add a requirement in</p>	<p>We supported this proposal.</p> <p><b>Result:</b> The proposal was adopted with additional consequential amendments to part 4 of the Model Regulations.</p>

	<p>P203, under "Requirements for closed cryogenic receptacles" as follows:</p> <p>"(8) Periodic Inspection The periodic inspection and test frequencies of pressure relief devices in accordance with 6.2.1.6.3 shall not exceed five years."</p>	
<b>DOCUMENTS OTHER THAN THOSE RELATED TO CLASS 1 OR CLASS 2</b>		
<p><b>2010/1</b></p>	<p><i>Amendment to 6.7.2 (Spain)</i> In this paper, Spain proposes to make a number of technical amendments to requirements for the design and construction of portable tanks. Specifically, Spain proposes to:</p> <ol style="list-style-type: none"> <li>1) Amend 6.7.2.13.2 by updating a reference to ISO 4126-1:1991 with references to ISO 4126-1:2004 and ISO 4126-7:2004 (rated flow capacity of spring loaded pressure relief devices).</li> <li>2) Amend the last sentence of 6.7.2.14.1 as follows: "Vents or pipes from the pressure-relief devices outlets, when used, shall deliver the relieved vapour or liquid to the atmosphere <del>in conditions of minimum back pressure on the relieving devices</del> <b><u>without back pressure on the relieving device(s).</u></b>"</li> <li>3) Amend 6.7.2.13.1 by adding a new paragraph requiring the marking of cross-sectional flow area of the PRD: "<b><u>(f) The cross sectional flow area of the pressure-relief device(s) in mm<sup>2</sup>.</u></b>" (Spain notes that this aligns with the requirement to so mark in ISO 4126-1:2004 and ISO 4126-2:2004).</li> <li>4) Amend the last sentence of 6.7.2.15.1 to read as follows: "Protective devices which deflect the flow of vapour, <b><u>e.g. protective metal housings intended to be locked in closed position, on top of the shell,</u></b> are permissible if <b><u>they meet the two following conditions:</u></b></li> </ol>	<p>We supported the majority of the amendments proposed but expressed reservations about the fourth proposal regarding protective devices as the existing performance based text already requires that any housing not impede the relief capacity.</p> <p><b>Result:</b> Proposals 1 and 2 were adopted. Proposal 3 was adopted with a transitional period for new construction (1 January 2014). Proposal 4 was not adopted – Spain indicated they would bring back a revised proposal to the December session.</p>

<p><b>INF.3</b></p>	<p><b><u>(a) These protective devices are provided with vents or openings for the escaping vapour having a cross-sectional area of discharge not less than the cross sectional flow area of the pressure relief-device(s);</u></b>  <b><u>(b) The required relief-device(s) capacity calculated as established in 6.7.2.12.2.1 or 6.7.2.12.2.2 and 6.7.2.12.2.3 is not reduced.”.</u></b></p> <p><i>Amendment to 6.7.2 (Spain)</i>  In this paper Spain provides supplementary information relevant to their proposals in 2010/1.</p>	
<p><b>2010/2</b></p>	<p><i>Stacking load on large packaging (Sweden)</i>  In this paper, Sweden proposes to require the stacking marking currently applicable to IBCs on large packagings:</p> <p>“6.6.3.3 The maximum permitted stacking load applicable when the large packaging is in use shall be displayed on a symbol as follows:</p> <div data-bbox="405 865 1104 1073" data-label="Image"> </div> <p>The symbol shall be not less than 100 mm × 100 mm, be durable and clearly visible. The letters and numbers indicating the mass shall be at least 12 mm high. The mass marked above the symbol shall not exceed the load imposed during the design type test (see 6.6.5.3.3.4) divided by 1.8.</p> <p><b>NOTE:</b> The provisions of 6.5.3.3 shall apply to all large packagings manufactured, repaired or remanufactured as from [1 January</p>	<p>We supported this proposal.</p> <p><b>Result:</b> The proposal was adopted. Clarifications regarding the marking dimensions for both IBCs and Large Packagings will be addressed in December.</p>

	2015].”.	
<b>2010/3</b>	<p><i>Guidance for the security in transport of radioactive material (IAEA)</i></p> <p>In this paper, IAEA proposes amendments to Chapter 1.4 to take into account new thresholds for identification of radioactive material as high consequence dangerous goods. The new threshold values are intended to identify, as high-consequence dangerous goods, all radioactive material which, if not securely protected and therefore accessible to persons with malicious intent, could cause damage to persons, property, society and the environment.</p>	<p>We expressed concerns regarding the amendments to the general text of 1.4 but did not oppose adoption of the new threshold values determined by IAEA.</p> <p><b>Result:</b> The proposal was adopted in part. The new threshold values for radioactive material were adopted and propose modifications to the general text of 1.4 were not adopted.</p>
<b>INF.10</b>	<p><i>Comments on document ST/SG/AC.10/C.3/2010/3(AISE, CEFIC, CEPE, EIGA, FEA, FECC, FIATA, IRU and ITCO)</i></p> <p>In this paper, the above mentioned associations express their opposition to the proposals in 2010/3. A copy of their detailed comments submitted to IAEA is attached.</p>	
<b>2010/25</b>	<p><i>Guidance for the security in transport of radioactive material (IATA)</i></p> <p>In this paper IATA expresses concern over the implications of the proposed 1.4.1.4 shown in the Annex to 2010/3, which reads as follows:</p> <p style="padding-left: 40px;">1.4.1.4           Consignors shall provide appropriate crew members with written instructions on any required security measures, including how to respond to a security event during transport.</p> <p>In particular IATA is concerned that the text could be construed such that shippers would dictate security procedures to operators relevant to their shipments. IATA proposes the following alternative amendment to the Security Provisions of Chapter 1.4:</p> <p style="padding-left: 40px;">“1.4.3.2.3           Security plans developed in accordance with this Chapter:</p> <p>(a) shall be aligned with the provisions for security in transport for the mode(s) of transport as set out in</p>	<p>This proposal was withdrawn.</p>

	<p>regulations developed by the national authority responsible for transport security, where such regulations exist; and</p> <p>(b) where applicable, such security plans shall be subject to review and approval by the national authority responsible for transport security.”.</p>	
<p><b>2010/4 INF.27</b></p>	<p><i>New UN number for krill meal (Norway)</i> In this paper, Norway proposes to adopt a new shipping description for krill meal. Norway points out that the existing fish meal entries (UN 1374 and UN 2216) do not adequately address krill meal and references difficulties in acceptance of such meal under the most applicable n.o.s. entry (UN 3088 self-heating solid, organic, n.o.s.). Norway therefore proposes to include new Division 4.2 entries for “krill meal” at the PG II and PG III levels. In INF.27 Norway provides supporting data.</p>	<p>We supported the addition of a new proper shipping name for krill meal; however we questioned whether a new UN number is necessary or whether it would be more appropriate to simply include krill meal as an alternative proper shipping name under the existing UN 1374 PG II and/or UN 2216 entries. We also questioned whether a PG III entry is necessary as it seems impractical to test specific batches of krill meal prior to transport to determine a PG level.</p> <p><b>Result:</b> The proposal was adopted.</p>
<p><b>2010/5 INF.26</b></p>	<p><i>Fuel cells containing dangerous goods (IEC)</i> In this paper (replaced by INF.26), IEC contends that the current provisions applicable to fuel cell cartridges do not account for the case where the fuel cell itself is the reservoir for the dangerous goods rather than a cartridge. This paper proposes to expand the current provisions for fuel cell cartridges to permit the safe transport of fuel cells or/and fuel cell cartridges, containing one of the permitted dangerous goods. The following amendments are proposed:</p> <ul style="list-style-type: none"> <li>• Expand the proper shipping name of UN 3473, 3476, 3477, 3478 and 3479, appearing in Chapter 3.2, “Dangerous Goods List”, Column 2, under “Name and description”, as indicated in Proposal A thereafter;</li> <li>• Amend Special provisions 328 and 339, appearing in Chapter 3.3, paragraph 3.3.1, as indicated in Proposal B;</li> <li>• Amend packing instruction P004 as indicated in Proposal C;</li> <li>• Amend the “Alphabetical list of the substances</li> </ul>	<p>We did not support this proposal. We understand that the IEC standards may employ the terms “fuel cell’ and “fuel cell cartridge” slightly differently than the UN Model Regulations do. However, the UN Model Regulations already allow for a fuel cell with an internal reservoir to be considered a cartridge provided all applicable requirements and testing provisions are met. On this basis, we do not believe the amendments proposed are necessary.</p> <p><b>Result:</b> The proposal was withdrawn.</p>

<p><b>INF.17</b></p>	<p>and articles” as indicated in proposal D.</p> <p><i>Fuel cells containing dangerous goods (USFCC)</i>  In this paper the USFCC:</p> <ul style="list-style-type: none"> <li>• Expresses the view that the current provisions of the Model Regulations adequately address fuel cell reservoirs that are integral to the fuel cell;</li> <li>• Proposes to add the following sentence to SP 328 and as a replacement to the last sentence of P004:</li> </ul> <p><i>For fuel cell cartridges contained in equipment, the entire system shall be protected against short circuit and inadvertent operation.</i></p>	<p>As indicated above, we agree that the current provisions of the Model Regulations adequately address fuel cell reservoirs and appreciate the detailed review and justification provided by USFCC in this regard.</p> <p>We supported the addition of the proposed as a replacement for the last sentence of P004.</p> <p><b>Result:</b> The proposal was adopted.</p>
<p><b>2010/6</b></p>	<p><i>Mercury (UN 2809): Subsidiary risk 6.1 (Germany)</i>  In this paper Germany presents data showing that mercury meets the criteria for a Division 6.1 PG III inhalation hazard. Germany proposes to add a subsidiary risk of 6.1 to the current entry for Mercury in the Dangerous Goods List.</p>	<p>We expressed reservations about the studies used to validate the proposal and asked that the decision be deferred until the December session.</p> <p><b>Result:</b> The proposal was provisionally adopted pending any data justifying a contrary decision. A final decision will be made in December. Absent any additional data, the proposal will be adopted.</p>
<p><b>2010/7</b></p>	<p><i>Transport of used or damaged lithium batteries (Germany)</i>  In this paper Germany proposes that the Sub-Committee initiate discussions regarding the transport of used or damaged lithium batteries. Germany notes that provisions have been adopted within the ADR but that for purposes of the model regulations and multimodal transport, the considerations will be different. There are no specific proposals in this paper.</p>	<p>There were no specific proposals in this paper.</p> <p><b>Result:</b> The proposal was withdrawn.</p>
<p><b>2010/36</b></p>	<p><i>Transport of used cells or batteries for disposal or recycling (PRBA/RECHARGE)</i>  In this paper, PRBA and RECHARGE propose to incorporate revisions to the UN Model Regulations in order to address the transport of used cells or batteries for disposal or recycling. The proposed amendments are</p>	<p>We are not opposed to considering appropriate safety provisions for the transport of used cells and batteries. We believe that the proposed requirements provide a good starting point for discussion but that further consideration of some aspects may be necessary. We have issued a Special Permit in the United States to</p>

	<p>intended to be as consistent as possible with the requirements of the U.S. HMR and the ADR. PRBA proposes a new special provision and packing instructions similar to Special Provision 636 and Packing Instruction 903a and 903b in the ADR be adopted within the UN Model Regulations to facilitate the transport of used lithium ion and lithium metal batteries.</p>	<p>address this issue. We are interested in ensuring that the safety provisions considered in our Special Permit are also considered within the proposed requirements.</p> <p><b>Result:</b> The proposal was withdrawn. PRBA and RECHARGE indicated that they may submit revised proposals in December. The Sub-Committee expressed a view that the shipment of used batteries of all types should addressed in a comprehensive manner.</p>
<p><b>2010/10</b></p>	<p><i>Alignment with GHS, Proposal of amendment to Chapter 2.8 (Netherlands)</i></p> <p>In this paper the Netherlands proposes a number of amendments to the text of Chapter 2.8 which addresses classification of Corrosive substances. The Netherlands' proposal is intended to take into account the following conclusions reached by the Sub-Committee at its previous session:</p> <p><i>As a conclusion, the working group considered that</i></p> <p>(a) <i>There was no need to reproduce in full the GHS text in the United Nations Model Regulations because the criteria contained therein were in line with the GHS;</i></p> <p>(b) <i>Chapter 2.8 of the United Nations Model Regulations should be amended to underline the correlation between transport packing groups I, II and III and GHS sub-categories 1A, 1B and 1C;</i></p> <p>(c) <i>Notes should be included to explain the applicability and limitations of the use of extreme pH values, calculation methods for mixtures and bridging principles to deduce classification and their relationship with transport criteria."</i></p>	<p>This issue has been debated at length within the Sub-Committee and we understand that the Netherlands has worked to ensure the proposal takes into account the conclusions reached at the previous session. However, we continue to have concerns with the amendments proposed. We provided the following comments:</p> <ol style="list-style-type: none"> <li>1. Regarding the addition of the word "mixture" (2.8.1 and 2.8.2) – we are not convinced this amendment is necessary. The word substance is used throughout the model regulations in a general sense and includes mixtures. For example, reading the introductory text to Chapter 3.1, the term substance is used in reference to all listed materials in the Dangerous Goods List (see for example 3.1.1.1 and 3.1.1.2) and includes both "pure" substances and mixtures and solutions. Part 3 Appendix A also references "Substances or articles not mentioned specifically by name in the Dangerous Goods List". In general, the Model Regulations cover "substances" (which include solutions, mixtures, etc.) and "articles".</li> <li>2. Regarding 2.8.2.2, we do not support adding a reference to 2.8.3 (GHS criteria), as the referenced criteria will not lead in all cases to a Packing Group determination.</li> <li>3. Regarding the proposed table in 2.8.3 which correlates PG and GHS Sub-categories, we are concerned that the GHS criteria allow classification within a sub-category</li> </ol>

without testing under the OECD 404 or 435 standards. We understand for example that some competent authorities are allowing classification within sub-categories based on concentration ranges. We believe introducing the table, particularly without any explanation, may cause potential confusion. For example, those preparing safety data sheets may mistakenly correlate the GHS sub-category to a transport PG without verifying whether the appropriate classification determination required by the transport regulations has been considered.

4. Regarding 2.8.3.1, we are concerned with the addition of the sentence “These additional GHS classification criteria shall be used to assign the packing group in cases where the information mentioned in 2.8.2.4 is not available for the substance or mixture”. As noted in our comment 2, the GHS criteria will not always lead to a PG determination. We also suggest that the sentence stating “To assign a packing group, an in vitro or in vivo test can be performed” should read “must be performed” as only the 404 and 435 standards lead to a PG determination. In addition, we believe that the sentence “Where results from in vitro or in vivo tests are available, a classification based on these results prevails over a classification based on pH” is misleading in that a pH determination will never by itself lead to a PG determination – we would therefore prefer the sentence be deleted.

5. Regarding the final two paragraphs (bridging principles and mixture calculation principles) we believe these paragraphs would be misleading for transport classification purposes as there is no way to use bridging principles or mixture calculation principles to determine a PG and therefore they are not directly relevant to transport criteria. We believe the existing references to OECD Standards 430 and 431 in 2.8.2.4 are sufficient in that they authorize a “corrosive or not corrosive”

<p><b>INF.7</b></p> <p><b>INF.11</b></p> <p><b>INF.33</b></p> <p><b>INF.39</b></p>	<p><i>Addendum to ST/SG/AC.10/C.3/2010/10 (Netherlands)</i> In this paper the Netherlands reproduces comments received on its proposal, responds to the comments, and proposes several changes to account for a few of the comments.</p> <p><i>Comments on document ST/SG/AC.10/C.3/2010/10: proposal for amendments to Chapter 2.8 (AISE)</i> In this paper, AISE expresses concerns over the amendments proposed by the Netherlands. Specifically, AISE proposes to:</p> <ul style="list-style-type: none"> <li>• Delete the Table in 2.8.3.1; and</li> <li>• In 2.8.3.2 Extreme pH delete: “Where results from in vitro or in vivo tests are available, a classification based on these results prevails over a classification based on pH. [If data are not available it is permitted to assign packing group I based on extreme pH.]”</li> </ul> <p>CEFIC’s comments</p> <p>UK comments</p>	<p>determination. This essentially allows an initial determination as to whether the substance would be regulated for transport, however a substance for which a “corrosive” determination is made under the 430 or 431 standards would still further testing in accordance with the 404 or 435 (in vivo or in vitro) test methods to determine the transport PG.</p> <p>We appreciate the Netherlands’ efforts to present and respond to all comments received. We note however that they did not incorporate many of our comments. We plan to voice our specific concerns at the upcoming session.</p> <p>We share AISE’s concerns with the proposed Table and the wording of 2.8.3.2 and submitted similar comments to the Netherlands.</p> <p>We share many of CEFIC’s concerns.</p> <p>We agreed with the majority of the comments made by the UK.</p> <p><b>Result:</b> The majority of delegates did not believe the proposal took into account all comments made. It was noted that the criteria was under review by the GHS Sub-Committee, and the Netherlands was asked to resubmit the proposal taking into account this ongoing work and additional comments made during the session.</p>
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<p><b>2010/11</b></p>	<p><i>Alternative outer packaging for Packing Instruction P802 (ICCA)</i>  In this paper ICCA proposes to amend Packing Instruction P802 which is assigned to 3 entries:</p> <p><i>UN 1790 HYDROFLUORIC ACID with more than 60% hydrogen fluoride, 8,(6.1), I</i>  <i>UN 1836 THIONYL CHLORIDE, 8 (6.1), I</i>  <i>UN 2444 VANADIUM TETRACHLORIDE, 8, I</i></p> <p>Specifically, ICCA proposes to authorize fibreboard boxes (4G) and fibre drums (1G) as outer packagings with glass or plastics inner packagings as part of a combination packaging. ICCA notes that these packagings have been authorized since 2004 under a competent authority approval issued for sea transport under the IMDG Code and states that no incidents have occurred during that time.</p> <p>ICCA therefore proposes amending P802, paragraph (1), by inserting 1G and 4G as follows:</p> <p><i>(1) Combination packagings</i>  <i>Outer packagings: 1A2, 1B2, 1N2, 1H2, 1D, 1G, 4A, 4B, 4C1, 4C2, 4D, 4F, 4G or 4H2.</i></p>	<p>We supported this proposal. The HMR currently authorize the proposed outer packagings (see 49 CFR 173.201).</p> <p><b>Result:</b> The proposal was adopted.</p>
<p><b>2010/12</b></p>	<p><i>Transport of coolant/conditioning units (Germany, Netherlands and United Kingdom)</i>  This paper proposes to add a new section to the Model Regulations to deal with the use of dangerous goods for cooling or conditioning purposes. The paper proposes minimal packaging, marking, and documentation requirements designed to address the use of coolants and conditioners such as dry ice, nitrogen, etc.</p>	<p>We supported further development of the proposed text and worked with the UK to improve upon the proposal but expressed our view that the text still required further work.</p> <p><b>Result:</b> The text was discussed and modified in plenary. The modified text was provisionally adopted - we plan to review and offer additional comments for consideration at the December session.</p>
<p><b>2010/13</b></p>	<p><i>Portable tank special provision TP 37 – Extension of date (ITCO)</i>  In this paper ITCO proposes to extend the transition</p>	<p>We did not support this proposal. The tank instructions for the toxic by inhalation materials assigned TP 37 were amended based on the risk posed by such materials. We</p>

	<p>period in effect for portable tanks assigned TP 37 in the Dangerous Goods List. The current transitional period ends in 2016, and ITCO proposes to extend it to 2020. "TP37 The portable tank instructions prescribed in the Model Regulations annexed to the 15th revised edition of the Recommendations on the Transport of Dangerous Goods may continue to be applied until 31 December 2020."</p>	<p>note that the tanks themselves may continue to be used after 2016 – they simply would not be authorized for the materials assigned TP 37.</p> <p><b>Result:</b> The proposal was not adopted.</p>
<p><b>2010/14</b></p>	<p><i>Fuels in machinery and equipment (UK)</i></p> <p>In this paper the UK proposes to add a special provision to address fuel carried in tanks for the purpose of operating the equipment it is contained in or transported with. The proposed special provision would be applied against UN 1202, UN 1203, UN 1223, UN 1863 and UN 3745 and reads as follows:</p> <p><i>This entry applies to substances of UN 1202, UN 1203, UN 1223, UN 1863 and UN 3745 in excess of those amounts specified in column 7a of the Dangerous Goods List of Chapter 3.2 which are being carried with or in machinery or equipment carried as a load for the sole purpose of enabling that machinery or equipment to operate provided the following conditions are met.</i></p> <p><i>(a) Any valves or openings between the machinery or equipment and the tank within or attached to such machinery or equipment shall be closed during carriage;</i></p> <p><i>(b) The machinery or equipment shall be loaded in an orientation to prevent inadvertent leakage of fuel and secured by suitable means capable of restraining the machinery or equipment in a manner that will prevent any movement during carriage which would change the orientation or cause it to be damaged;</i></p> <p><i>(c) Where the fuel tank has a capacity greater than 1500L it shall be placarded on four sides in accordance with 5.3.1.2 and transport documentation in accordance with 5.4.1 shall be carried”.</i></p>	<p>We supported this proposal in principle. The intent of the proposal is to improve the level of hazard communication for bulk quantities of fuel attached to large equipment or machinery. We worked with the UK and other interested delegations to refine the text during the meeting.</p> <p><b>Result:</b> The proposal was adopted with revisions.</p>

	<p>In addition the paper proposes to add the following special provision to UN 3166 and UN 3363 (engines and dangerous goods in machinery or apparatus):</p> <p>"yyy This entry does not apply to equipment or machinery where the amounts of fuel being carried are in excess of those amounts specified in column 7a of the Dangerous Goods List in Chapter 3.2. For amounts in excess of column 7a of the Dangerous Goods List of Chapter 3.2, see Special Provision xxx."</p>	
<p><b>2010/15</b></p>	<p><i>Amendment to Special Provision 240 (Germany)</i></p> <p>In this paper Germany proposes to amend special provision 240 to clarify the applicability of the entries for UN 3171 BATTERY-POWERED VEHICLE or BATTERY-POWERED EQUIPMENT or UN 3091 LITHIUM METAL BATTERIES CONTAINED IN EQUIPMENT and UN 3481 LITHIUM BATTERIES CONTAINED IN EQUIPMENT. In addition Germany proposes to adopt the amendments to P 903 and the newly proposed Special Provision 360 provisionally agreed during the last meeting.</p> <p>“240 This entry only applies to vehicles powered by wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries and equipment powered by wet batteries or sodium batteries transported with these batteries installed.</p> <p>Examples of such vehicles are electrically-powered cars, <u>motorcycles, scooters, three and four wheeled vehicles or motorcycles, e-bikes, wheel-chairs and boats.</u></p> <p>Examples of such equipment powered by sodium or wet batteries are <del>{motorcycles, scooters, E-bikes}</del>, <u>lawnmowers or cleaning machines wheelchairs or other mobility aids.</u> Equipment powered by lithium metal batteries or lithium ion batteries shall be consigned under the entries UN 3091 LITHIUM METAL BATTERIES CONTAINED IN EQUIPMENT or UN 3091</p>	<p>We supported this proposal in principle. We agreed with Germany’s intent which is to clarify that equipment powered by lithium batteries should be transported under the appropriate lithium battery proper shipping names.</p> <p><b>Result:</b> This proposal was adopted with revisions.</p>

	<p>LITHIUM METAL BATTERIES PACKED WITH EQUIPMENT or UN 3481 LITHIUM ION BATTERIES CONTAINED IN EQUIPMENT or UN 3481 LITHIUM ION BATTERIES PACKED WITH EQUIPMENT, as appropriate.</p> <p>Hybrid electric vehicles powered by both an internal combustion engine and wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries, transported with the battery(ies) installed shall be consigned under the entries UN 3166 VEHICLE, FLAMMABLE GAS POWERED or UN 3166 VEHICLE, FLAMMABLE LIQUID POWERED, as appropriate. Vehicles which contain a fuel cell shall be consigned under the entries UN 3166 VEHICLE, FUEL CELL, FLAMMABLE GAS POWERED or UN 3166 VEHICLE, FUEL CELL, FLAMMABLE LIQUID POWERED, as appropriate.”</p> <p>[“360 Vehicles only powered by lithium metal batteries or lithium ion batteries shall be consigned under the entry UN 3171 BATTERY-POWERED VEHICLE.”.]</p> <p>Proposed changes to P903:</p> <p>[In the second row, third paragraph, at the end, insert “constructed of suitable material of adequate strength and design, in relation to the packagings capacity and its intended use. It should be also constructed” before “in such a manner” and add the following new sentence at the end “[Large equipment] can be offered for transport unpackaged or on pallets when the battery is afforded equivalent protection by the equipment in which it is contained.”.]</p>	
<p><b>2010/16</b></p>	<p><i>Battery-powered vehicles (USFCC)</i>  In this paper the USFCC provides an alternative to the</p>	<p>We did not support this proposal. We expressed our view that we considered the solution presented by Germany to</p>

proposed text for SP 240 proposed by Germany. USFCC proposes to amend Special Provision 240 to read as follows:

This entry only applies to vehicles powered by wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries and equipment powered by wet batteries or sodium batteries transported with these batteries installed. Examples of such vehicles are electrically-powered cars, lawnmowers, scooters, E-Bikes, motorcycles, wheelchairs, and other mobility aids. When vehicles are shipped with the batteries installed, the vehicle shall be packed in strong outer packagings constructed of suitable material of adequate strength and design in relation to the packaging's capacity and its intended use unless the battery is afforded equivalent protection by the vehicle in which it is installed. Equipment powered by lithium metal batteries or lithium ion batteries shall be consigned under the entries UN 3091 LITHIUM METAL BATTERIES CONTAINED IN EQUIPMENT or UN 3091 LITHIUM METAL BATTERIES PACKED WITH EQUIPMENT or UN 3481 LITHIUM ION BATTERIES CONTAINED IN EQUIPMENT or UN 3481 LITHIUM ION BATTERIES PACKED WITH EQUIPMENT, as appropriate. Hybrid electric vehicles powered by both an internal combustion engine and wet batteries, sodium batteries, lithium metal batteries or lithium ion batteries, transported with the battery(ies) installed shall be consigned under the entries UN 3166 VEHICLE, FLAMMABLE GAS POWERED or UN 3166 VEHICLE, FLAMMABLE LIQUID POWERED, as appropriate. Vehicles which contain a fuel cell shall be consigned under the entries UN 3166 VEHICLE, FUEL CELL, FLAMMABLE GAS POWERED or UN 3166 VEHICLE, FUEL CELL, FLAMMABLE LIQUID POWERED, as appropriate.”

be more appropriate and comprehensive.

**Result:** This proposal was not adopted.

<p><b>2010/17</b></p>	<p><i>Hazard communication for supply and use of aerosols (UK/FEA)</i></p> <p>In this paper the UK and FEA propose amendments to the GHS text related to aerosols. The proposal would ensure the GHS text treats aerosols separately from other gases under pressure. This would allow the corresponding provisions to differ from those of gases for and ensure for example that Division 2.2 aerosols are not labeled with a non-flammable gas label.</p>	<p>The proposals in this paper are to amend the GHS text and do not directly affect the transport requirements/UN Model Regulations. We worked jointly with CPSC, OSHA, and EPA to review this proposal and expressed our support, with the exception of the proposed requirement to indicate the percentage of flammable constituents on non-flammable aerosols.</p> <p><b>Result:</b> The proposal was adopted by the GHS Subcommittee with minor amendments.</p>
<p><b>2010/18</b> <b>INF.50</b> <b>INF.80</b> <b>INF.83</b></p>	<p><i>Division 1.4S limited quantities (SAAMI)</i></p> <p>In this paper SAAMI proposes to introduce limited quantity provisions for a number of Division 1.4S articles. Two options are given – one which addresses only certain types of ammunition, and another which includes a larger number of Division 1.4S articles. The proposed limited quantity authorization is 5 kg. In addition, the paper proposes to expand the UN0014 entry to cover blank cartridges used for tools as well as blank ammunition.</p>	<p>We supported the major aspects of this proposal in principle. The HMR currently afford certain ammunition to be reclassified as ORM-D material. Authorizing certain ammunition to be considered as limited quantities would afford a similar level of regulation to the international transport of such ammunition. We expressed our view that providing the authorization to the many other 1.4S articles listed in the proposal is appropriate, and that any authorizations for additional materials should be subject to appropriate review.</p> <p><b>Result:</b> The proposal was discussed in plenary and referred to the explosives working group. The working group considered the issue and determined that there were no technical grounds to exclude ammunition from a limited quantity authorization. The working group also agreed that variations in risk amongst various Division 1.4S articles made it inappropriate to make a blanket determination that all 1.4S articles should be eligible for a limited quantity authorization. The group discussed factors that should be considered as guiding principles in this regard and concluded that the following would serve as a good starting point:</p> <ul style="list-style-type: none"> <li>• The items must not propagate independent of packaging.</li> <li>• No entries on high consequence list were</li> </ul>

		<p>selected.</p> <ul style="list-style-type: none"> <li>• No generic entries or n.o.s. entries were selected.</li> <li>• The item must present no hazardous effects outside the package in the event of accidental initiation (as determined by use of the 6(d) test).</li> </ul> <p>The principle of adding provisions to Chapter 3.4 was put to the vote and adopted. SAAMI prepared a new proposal for the provisions to be added, which was adopted with some amendments, including the addition of a reference to segregation provisions. The provisions will be adapted to the new structure of Chapter 3.4 (see INF.83 and paragraphs 109 and annex I of the 37<sup>th</sup> Session report).</p>
<b>2010/21</b>	<p><i>Packaging for aerosols (FEA)</i>  In this paper FEA notes that the current Model Regulations limit the net mass of aerosols in an outer package to 55 kg for fibreboard packagings and 125 kg net mass for other packagings. FEA believes these limits are unnecessary based on the inherent integrity of aerosols and proposes two options:</p> <ol style="list-style-type: none"> <li>1) Eliminate the net weight limitation altogether (i.e. delete PP17 in packing instruction P003; or</li> <li>2) Authorize PG II specification packagings in addition to the current authorization for non-spec packagings and apply no net weight limitation on the aerosols when transported in PG II packagings.</li> </ol>	<p>We favor option 2 – authorizing specification packagings. This would authorize a maximum net mass consistent with the limits for the specification packaging authorized and ensure a high level of integrity for the outer packaging.</p> <p><b>Result:</b> The Sub-Committee adopted proposal 2 for a new packing instruction specific to aerosols with some modifications, and consequential amendments (see INF.86/Rev.1).</p>
<b>2010/22</b>	<p><i>Special Provision 297 related to carbon dioxide, solid (dry ice) (IATA)</i>  In this paper IATA proposes to revise special provision 297 to ensure that dry ice used to refrigerate non-dangerous goods is afforded the same level of regulation as dry ice used to refrigerate diagnostic/medical specimens. The proposed text also clarifies the applicable marking and documentation requirements.</p>	<p>We supported this proposal. The revised text is an improvement to the current text, removes an arbitrary limitation of the exceptions to a particular commodity, and clarifies the applicable marking and documentation.</p> <p><b>Result:</b> The proposal was withdrawn in consideration of the broader amendments considered in the related UK proposal (2010/12) – a revised proposal will be</p>

	<p>"297 For air transport, arrangements between consignor and operator(s) shall be made for each consignment, to ensure that ventilation safety procedures are followed.</p> <p>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".</p> <p>Carbon dioxide, solid (dry ice) is excepted from the <del>shipping paper</del> <u>marking requirements of section 5.2.1 and documentation requirements of Chapter 5.4 when the dry ice is used as a refrigerant for other than dangerous goods, # provided that:</u></p> <p>(a) <u>The consignor provides alternative written documentation describing the contents. Where an agreement exists with the carrier, the consignor may provide the information by EDP or EDI techniques. The information required is as follows and should be shown in the following order:</u></p> <ol style="list-style-type: none"> <li><u>1. UN 1845;</u></li> <li><u>2. "carbon dioxide, solid" or "dry ice";</u></li> <li><u>3. the number of packages and the net quantity of dry ice in each package.</u></li> </ol> <p>(b) <u>The package(s) is marked "UN 1845", "Carbon dioxide, solid" or "Dry ice" and with the net mass of dry ice in each package and is marked with an indication that the substance being refrigerated is used for diagnostic or treatment purposes (e.g., frozen medical specimens)."</u></p>	<p>considered at the next session.</p>
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<p><b>2010/23</b></p>	<p><i>Proposal to clarify 5.2.2.2.1.2 Provisions for labels of cylinders for Class 2 (EIGA)</i></p> <p>In this paper EIGA notes that the Model Regulations currently authorize reduced labels on cylinders but points out that this authorization does not extend to markings such as the environmentally hazardous substance marking. EIGA proposes the following amendment:</p> <p>“5.2.2.2.1.2 Cylinders for class 2 may, on account of their shape, orientation and securing mechanisms for transport, bear labels <b>and the environmentally hazardous mark</b> representative of those specified in this section, which have been reduced in size according to ISO 7225:2005, for display on the non-cylindrical part (shoulder) of such cylinders. Labels <b>and the environmentally hazardous mark</b> may overlap to the extent provided for by ISO 7225: Gas cylinders-Precautionary labels”, however, in all cases the labels representing the primary hazard and the numbers appearing on any label shall remain fully visible and the symbols recognisable.”</p> <p>In addition EIGA provides an example of a neck-ring label for chlorine incorporating the environmentally hazardous substance marking:</p> 	<p>We did not support this proposal. The Sub-Committee previously took a decision that the environmentally hazardous substance marking would only apply to substances not meeting the definition of any other hazard class. The example given for Chlorine is therefore not appropriate. In addition, the criteria for environmentally hazardous substances (aquatic environment) apply only to “liquid or solid substances” (see 2.9.3.1.1). Therefore, this proposal would be of limited value as the text of 5.2.2.2.1.2 is limited to “cylinders for Class 2”.</p> <p><b><u>Result:</u></b> The proposal was withdrawn.</p>
<p><b>2010/26</b></p>	<p><i>Revision of various specialist packing instructions in the Model Regulations (UK/Sweden/IATA)</i></p> <p>This paper proposes a number of amendments to various packing instructions. In general, the paper seeks to address instances where packing instructions refer only to a packaging performance level (e.g. “packagings shall conform to the Packing Group II performance level”) but do not specify the authorized packaging type. The</p>	<p>We supported this proposal in principle. However we note that with respect to P004, the amendments made may not be completely appropriate to fuel cells. We support the amendments proposed in INF.29 (USFCC).</p> <p><b><u>Result:</u></b> The proposal was adopted with amendments (see INF.87).</p>

<p><b>INF.16</b></p>	<p>revisions to the packing instructions would clearly identify which packagings are authorized consistent with the way other packing instructions are written.</p> <p><i>Comments on P302 in ST/SG/AC.10/C.3/2010/26 “Revision of various specialist packing instructions in the Model Regulations” (CEPE)</i></p> <p>In this paper CEPE recommends the following amendment to the text proposed for P302 in order to ensure it is clear that the performance level applies to the completed combination packaging and not to inner packagings:</p> <p><i>“Combination packagings shall conform to the packing group II or III performance level according to the criteria for Class 3 applied to the base material.”</i></p>	<p>We did not support this amendment. There are numerous other instances throughout the Model Regulations in the Packing Instructions where the word “packaging” is used and applies to the completed package. For example, P201 and P407 are also addressed in 2010/26 and state “Packagings shall conform to the packing group III performance level.” The fact that inner packagings do not in and of themselves meet a performance level is a basic premise within the Regulations.</p> <p><b>Result:</b> CEPE’s proposal was not adopted – the placement of the text in the P302 was instead amended to solve the interpretation problem.</p>
<p><b>INF.29</b></p>	<p><i>Revision of various specialist packing instructions in the Model Regulations (USFCC)</i></p> <p>In this paper the USFCC proposes alternate text to that proposed for in 2010/26 in relation to P004. The amendments provide clarity and ensure consistency with the present requirements for fuel cells.</p>	<p>We supported the text proposed by the USFCC.</p> <p><b>Result:</b> The amendments proposed by USFCC were adopted.</p>
<p><b>2010/27</b></p>	<p><i>Special Provision 290 and limited quantities (UK)</i></p> <p>In this paper the UK notes that when Special Provision (SP) 290 was revised for the sixteenth revised edition of the Model Regulations, one of the resulting changes is that from paragraph (c) of the new SP290, the provisions of Chapter 3.4 for the transport of dangerous goods packed in limited quantities, no longer apply to substances classified in accordance with paragraph (b). The UK proposes to revise SP290 to facilitate transport of samples that consist of a non-Class 7 substance meeting the quantity limits of dangerous goods packed in limited quantities (e.g. a corrosive solution) containing radioactive material meeting the classification criteria of</p>	<p>The proposal was withdrawn.</p>

	excepted package.	
<b>2010/28</b>	<p><i>Portable tanks instructions for Division 4.3 liquids (USA)</i></p> <p>At its previous session, the Sub-Committee considered a US proposal 2009/44 which proposed a number of amendments to provisions for the transport of Division 4.3 liquids in portable tanks. As a result, the Sub-Committee agreed to amend the Guiding Principles for the assignment of portable tank provisions to such materials, and to make consequential amendments to the portable tank provisions for substances currently authorized for transport in portable tanks in the Dangerous Goods List. We agreed to follow up with a proposal addressing such materials not authorized in portable tanks. This paper contains proposed amendments to the Dangerous Goods List in line with the revised guiding principles adopted at the previous session. In addition the proposal seeks to add a new special provision to the WATER-REACTIVE LIQUID, TOXIC, N.O.S. PG I entry (UN 3130) to ensure that water-reactive materials capable of igniting in the presence of water or moist are assigned to T21:</p> <p><i>TPXX For Division 4.3 packing group I liquids capable of igniting in the presence of water or moist air, portable tank instruction T21 shall apply rather than the portable tank instruction shown in column (10) of the Dangerous Goods List.</i></p>	<p>U.S. Proposal</p> <p><b>Result:</b> Based on comments received during the meeting, we withdrew the proposal and will consider whether a revised proposal should be submitted for the December session.</p>
<b>2010/30</b>	<p><i>Sodium batteries: Amendment to Special Provision 239 (USA)</i></p> <p>The Model Regulations currently authorize the transport of sodium cells and batteries under the description “Batteries containing sodium or Cells containing sodium” (UN 3292). Special Provision 239 applies and limits the types of dangerous goods which may be contained in such batteries to sodium, sulphur, and polysulphides. In recent years, however, other sodium</p>	<p>U.S. Proposal</p> <p><b>Result:</b> The proposal was adopted.</p>

	<p>battery chemistries have emerged and become more widely used and commonly transported. For example, some batteries with sodium metal chloride chemistries use sodium tetrachloroaluminate as a secondary electrolyte (see annex). We propose to revise the first sentence of Special Provision 239 to more comprehensively address sodium compounds utilized in sodium batteries:</p> <p>239 Batteries or cells shall not contain dangerous goods other than <del>sodium, sulphur and/or polysulphides</del>. <b><u>sodium, sulphur and/or sodium compounds (e.g. sodium polysulphides, sodium tetrachloroaluminate etc.)</u></b>. Batteries or cells shall not be offered for transport at a temperature such that liquid elemental sodium is present in the battery or cell unless approved and under the conditions established by the competent authority.</p> <p>Cells shall consist of hermetically sealed metal casings which fully enclose the dangerous goods and which are so constructed and closed as to prevent the release of the dangerous goods under normal conditions of transport.</p> <p>Batteries shall consist of cells secured within and fully enclosed by a metal casing so constructed and closed as to prevent the release of the dangerous goods under normal conditions of transport.</p> <p>Except for air transport, batteries installed in vehicles (UN 3171) are not subject to these Regulations.</p>	
<p><b>2010/32</b></p>	<p><i>Vibration test for large packagings (USA)</i></p> <p>In this paper we note that currently, the Model Regulations require a vibration test be performed as a design-type test on all Intermediate Bulk Containers (IBCs) used for liquids. The vibration test is intended to ensure that a package is able to withstand vibrations incident to transport without breakage or leakage. The existing requirements of the Model Regulations with respect to testing requirements for large packagings were modeled largely after those already in place for IBCs.</p>	<p>U.S. proposal</p> <p><b>Result:</b> The proposal was not adopted.</p>

	<p>Currently the testing requirements for both IBCs and large packagings intended to contain liquids are fairly identical. For example, bottom and top lift tests, a stacking test, and a drop test are all required for both IBCs and large packagings intended to contain liquids. Currently, however the testing requirements for large packagings do not require a vibration test. In fact, the only test not required for large packagings but required for IBCs intended to contain liquids is the vibration test. We therefore propose that a vibration test be added to Chapter 6.6 to help ensure the integrity of large packagings intended to contain liquids.</p> <p>The proposed test would be required for all large packagings containing inner packagings used for liquids, and would apply as a design type test for packagings manufactured as from 1 January 2015.</p>	
<p><b>2010/33</b></p>	<p><i>Transport requirements for ultracapacitors (Electric Double Layer Capacitors) (KFI)</i></p> <p>In this paper, KFI proposes to include provisions for ultracapacitors (electric double layer capacitors) within the UN Model Regulations. A number of options are proposed, including:</p> <p>Option 1 - Transport capacitors as Class 9 under the existing UN 3363 Dangerous Goods in Apparatus without amendment of SP 301.</p> <p>Option 2 - Revise SP 301 and transport capacitors as Class 9 under UN 3363 Dangerous Goods in Apparatus.</p> <p>Option 3 - Introduce a new entry in Class 9 for capacitors.</p> <p>Option 4 - Introduce new entries for capacitors for each class of electrolyte used and a separate entry in Class 9 for capacitors containing non dangerous electrolyte.</p>	<p>We supported addressing ultracapacitors specifically within the UN Model Regulations and believe a Class 9 entry (Option 3) is the most appropriate way forward based on the risks posed by such capacitors. However, the regulatory provisions for these articles must adequately address the risks posed by such capacitors and provide the appropriate transport conditions. We believe that the specific text proposed by KFI requires further work and consideration. For example, KFI proposes that capacitors with a marked capacitance of 10 kF or less be considered not subject to other provisions of the Regulations when they meet prescribed conditions and are capable of withstanding a 1.2 meter drop test. We understand existing capacitors are all of a capacitance equal to or less than 10 kF – therefore under this proposal all would be excepted.</p> <p>We believe appropriate provisions for ultracapacitors should consider:</p> <ul style="list-style-type: none"> <li>-A Class 9 designation based on the drop, pressure differential test and (for the larger capacitors) appropriate venting requirements</li> </ul>

<p><b>INF.36</b></p>	<p><i>Transport requirements for ultracapacitors (Electric Double Layer Capacitors) (KFI)</i>  In this paper KFI provides a revised proposal taking into account comments received from JEITA, the Japanese industry association with an interest in ultracapacitors.</p>	<p>-Adequately addressing the permitted electrolytes and quantities  -Adequately addressing state of charge (Is it necessary for example to require the capacitors be shipped uncharged?)  -A marking that would allow differentiation between those capacitors small enough to be excepted and others  -Appropriate packaging provisions  While the KFI proposal addresses a number of these aspects, we do not believe the proposal satisfactorily addresses all of our transportation safety concerns.</p> <p>This revised proposal is under review.</p> <p><b>Result:</b> The proposal was rewritten and adopted (see INF.79) taking into account our comments as shown in our informal document INF.65.</p>
<p><b>2010/34</b></p>	<p><i>Packagings for large lithium batteries (PRBA)</i>  In this paper PRBA notes that the development of large lithium ion batteries for applications such as electric vehicles has created a need for new packaging provisions for large batteries/battery assemblies with a gross mass of more than 400 kg that are not encased in a strong impact resistant outer casing. Packing Instruction 903 provides for lithium batteries in packagings of up to 400 kg gross mass subject to the requirements in Chapter 6.1 and permits batteries of more than 12 kg with a strong impact resistant outer casing to be packed in a strong outer packaging, in protective enclosures unpackaged or on pallets. PRBA proposes that such batteries and battery assemblies not in strong outer casings be allowed to be transported in large packagings and assigned to a new LP 903 in the Dangerous Goods List. The proposed LP 903 would authorize PG II performance level large packagings.</p>	<p>We are reviewing the implications of this proposal. We are concerned in particular with ensuring that any proposed authorization provides a level of safety equivalent to the current requirement. We believe for example that the authorization to use a large packaging for a large battery not employing a strong impact resistant outer casing should be limited to one battery per package.</p> <p><b>Result:</b> The proposal was withdrawn.</p>
<p><b>2010/35</b></p>	<p><i>Amendments to Special Provision 310</i>  In this paper PRBA proposes to amend SP 310 to take into account amendments agreed to by the ICAO DGP</p>	<p>This proposal was withdrawn.</p>

	<p>when the DGP worked to harmonize SP A88 with the requirements of the UN Model Regulations. PRBA proposes to:</p> <p>1) Amend Special Provision 310 to allow lithium ion and lithium metal cells and batteries, battery assemblies and equipment containing such batteries or battery assemblies with a mass of 12 kg or greater and having a strong, impact resistant outer casings, to be packed in strong outer packagings or protective enclosures. PRBA notes this type of packaging is authorized in Packing Instruction P903 and PRBA believes it should be extended to Special Provision 310 for prototype and low production batteries and that a similar provision was adopted at the twenty-second meeting of the ICAO DGP; and</p> <p>2) limit production runs to not more than 100 lithium cells or batteries <u>annually</u>.</p>	
<p><b>2010/38</b></p> <p><b>INF.14</b></p>	<p><i>Proposal for classification criteria and packing requirements for chemicals under pressure (ICCA)</i></p> <p><i>Chemicals under pressure: addendum to proposal ST/SG/AC.10/C.3/2010/38 (ICCA)</i></p> <p>In this paper ICCA proposes to amend their proposed text to clearly distinguish chemicals under pressure from other instances where a gas may be added simply to eliminate air from the vapor space from a packaging.</p> <p>Specifically, ICCA proposes to add a fifth paragraph to new Special Provision XYZ:</p> <p>“(e) Substances for which PP86 or TP7 is assigned and therefore require air to be eliminated from the vapour space, shall be prohibited for transport under this UN number but shall be transported under their respective UN numbers as listed in Chapter 3.2, Dangerous Goods List.”.</p>	<p>We supported this proposal. ICCA’s revisions to the proposal addressed the majority of our comments made throughout the biennium. We participated in several informal working groups to refine the proposal and agree on a finalized text (see INF.69).</p> <p><b>Result:</b> The proposal was adopted.</p>

<p><b>2010/37</b></p>	<p><i>Portable tanks for chemicals under pressure (ICCA)</i>          In this paper ICCA proposes to authorize the newly proposed descriptions for chemicals under pressure within portable tank instruction T50 to ensure such materials may be transported in portable tanks.</p>	<p>We support this proposal in principle but expressed our view that further work is necessary to ensure the proposed provisions are appropriate and technically correct.</p> <p><b>Result:</b> The proposal received support in principle and ICCA agreed to submit a revised proposal at the following session taking into account comments from the Sub-Committee.</p>
<p><b>2010/39</b></p> <p><b>INF.8</b></p>	<p><i>Possible use of flexible bulk containers (FBCs) for the transport of dangerous (IDGCA)</i>          In this paper IDGCA proposes to establish a new bulk container specification “BK3” to address applications where large flexible packages are used to contain certain PG II and PG III solid materials. A specific list of materials is provided.</p> <p>INF.8 and its attachments contain supplemental information relative to 2010/39.</p>	<p>We have worked closely with IDGCA on this issue and support this proposal although due to the volume of amendments necessary we may provide additional comments on the proposed text. The design, construction and testing provisions provide a level of safety equivalent to that of other currently authorized packagings for such materials. In addition, the materials authorized are limited appropriately to lower hazard solid materials.</p> <p><b>Result:</b> This proposal was considered by a lunchtime working group chaired by the Vice Chairman (USA). During the working group meeting, a number of delegates expressed concerns about the use of large FBCs in road transport and the practicality of testing such large packages. A second informal discussion also led by the Vice Chairman was held to chart a way forward to address the issue. It was agreed that further intercessional discussions should be held taking into account the following key areas of concern:</p> <ul style="list-style-type: none"> <li>• Types of materials authorized;</li> <li>• Appropriateness of the specification (BK3) proposed with respect to design type elements (such as banding etc.) to ensure the integrity of the package;</li> <li>• Testing provisions; and</li> <li>• Operational considerations (if any).</li> </ul>

		The USA volunteered to lead a correspondence group that would consolidate comments and work with ICCA to make appropriate revisions to the proposal. This proposal will be considered further in December.
<b>2010/41</b>	<p><i>Dangerous goods packed in limited quantities (Secretariat)</i></p> <p>At its previous session the Sub-Committee agreed to editorially amend the newly adopted revisions to the limited quantity provisions to make them self-contained – i.e. ensure Chapter 3.4 could be read as a stand-alone section. It was agreed that this format would be useful to users of the limited quantity provisions, many of whom may not be intimately familiar with the full scope of the Regulations. This paper is the result of the Secretariat’s efforts to accomplish this goal.</p>	<p>We supported the goal of making Chapter 3.4 as user-friendly as possible but expressed our concern that the text should not include any new elements not originally agreed to by the Sub-Committee (for example an gross mass limit per transport vehicle such as that contained in the ADR/RID).</p> <p><b>Result:</b> The Sub-Committee agreed that requirements not currently included in Chapter 3.4 should not be considered and therefore paragraph 3.4.12 should be deleted from the proposal. The Sub-Committee agreed to adopt the rest of the text in square brackets for a second reading at the next session. The secretariat was invited to prepare a new version of sub-section 3.4.1 that would clarify the application to various modes of transport, and that would take account of the decisions taken for articles of division 1.4, compatibility group S (see also informal document INF.83 and paragraphs 16-18 of the session report).</p>
<b>2010/42</b>	<p><i>Miscellaneous proposals (Secretariat)</i></p> <p>In this paper the Secretariat addresses a number of miscellaneous issues for consideration by the Sub-Committee:</p> <ol style="list-style-type: none"> <li>1) UN 1792 Iodine monochloride – the Sub-Committee is invited to consider whether the listing as a solid in the UN Model Regulations is correct, or whether the substance should be listed as a liquid, or whether two entries should exist to address both physical states.</li> <li>2) The Sub-Committee is invited to consider whether two of the below names can be deleted as they appear redundant:</li> </ol>	<p>Our positions were as follows:</p> <ol style="list-style-type: none"> <li>1) We were not opposed to reviewing the listing for Iodine monochloride, however any modification should be based on complete information submitted on the appropriate data sheet specified in the Model Regulations.</li> </ol> <p><b>Result:</b> The entry for UN1792 was split into separate entries to address both liquid and solid forms.</p>

	<p>UN 3488 TOXIC BY INHALATION LIQUID, FLAMMABLE, CORROSIVE, N.O.S. with ... (LC<sub>50</sub> ≤ 200 ml/m<sup>3</sup>, saturated vapour concentration ≥ 500 LC<sub>50</sub>) <i>which appears similar to:</i></p> <p>UN 3492 TOXIC BY INHALATION LIQUID, CORROSIVE, FLAMMABLE, N.O.S. with (LC<sub>50</sub> ≤ 200 ml/m<sup>3</sup>, saturated vapour concentration ≥ 500 LC<sub>50</sub>);</p> <p>UN 3489 TOXIC BY INHALATION LIQUID, FLAMMABLE, CORROSIVE, N.O.S. (LC<sub>50</sub> ≤ 1000 ml/m<sup>3</sup>, saturated vapour concentration ≥ 10 LC<sub>50</sub>) <i>which appears similar to:</i></p> <p>UN 3493 TOXIC BY INHALATION LIQUID, CORROSIVE, FLAMMABLE, N.O.S (LC<sub>50</sub> ≤ 1000 ml/m<sup>3</sup>, saturated vapour concentration ≥ 10 LC<sub>50</sub>)</p> <p>3) The Sub-Committee is invited to consider the definition of "Mass loss" in sub-section 38.3.2 of the Manual of Tests and Criteria contains a table (Table 1) which indicates the mass loss limit according to the mass M of a cell or a battery. The first column does not allow to determine the mass loss limit when the mass M is equal to 1 g. The mistake appeared in the original proposal (ST/SG/AC.10/2000/13), from Japan and the United States of America) (see also ST/SG/AC.10/27, paras 93-95, and ST/SG/AC.10/27/Add.2).</p>	<p>2) We agreed to delete the entries as recommended by the Secretariat.</p> <p><b>Result:</b> The proposal was adopted.</p> <p>3) We supported this editorial correction.</p> <p><b>Result:</b> The proposal was adopted.</p>
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<p><b>2010/43</b></p>	<p><i>Marking of UN numbers on packages (EIGA)</i>  In this paper EIGA addresses the recent amendment to the Model Regulations requiring a minimum of 12 mm height for the UN number marking. EIGA proposes that the requirement be amended to authorize a smaller size (3 mm) when affixed to a shoulder label (neck ring label) on a cylinder.  The text proposed is as follows:  "The UN number and the letters "UN" shall be at least 12 mm high, except for packagings of 30 litres or 30 kg capacity or less, when they shall be at least 6 mm in height and for packagings of 5 litres or 5 kg or less when they shall be of an appropriate size. <b><i>For pressure receptacles of up to 150 litres water capacity the UN number and the letters "UN" may be reduced in size to 3 mm when affixed on a shoulder label.</i></b>"</p>	<p>This proposal was withdrawn.</p>
<p><b>INFORMAL DOCUMENTS</b></p>		
<p><b>INF.4 and INF.4/ Add.1</b></p>	<p><i>Revision of the IAEA Safety Regulations (TS-R-1) and implementation of guidance for the security in transport of radioactive material (IAEA)</i>  INF.4 reports progress made by IAEA with respect to revisions to TS-R-1. The addendum (Add.1) contains the Annex 1 referred to in paragraph 3 of informal document INF.4.</p>	<p>There were no proposals in these papers.</p>
<p><b>INF.6</b></p>	<p><i>Change of organization name (IVODGA)</i>  In this paper, the former Vessel Operators Hazardous Materials Association, Inc., (VOHMA), advises the Subcommittee that they have officially changed their name to the International Vessel Operators Dangerous Goods Association (IVODGA).</p>	<p>There were no proposals in this paper.</p>
<p><b>INF.9</b></p>	<p><i>Special provision 338 (Secretariat)</i>  In this paper the Secretariat proposes notes that the current language of SP 338 can be misinterpreted:</p> <p style="padding-left: 40px;">338 Each fuel cell cartridge transported under this entry and designated to contain a liquefied flammable gas shall:</p>	<p>We were not opposed to this proposal.</p> <p><b>Result:</b> The proposal was adopted with revisions.</p>

	<p>(a) ...</p> <p>(b) Not contain more than 200 ml of liquefied flammable gas with a vapour pressure not exceeding 1000 kPa at 55 °C; and</p> <p>....".</p> <p>Specifically, the Secretariat states that certain manufacturers interpret this to mean that a fuel cell cartridge could contain more than 200 ml liquefied flammable gas provided that the vapour pressure exceeded 1000 kPa at 55 °C. The Secretariat suggests that paragraph (b) be amended to read:</p> <p>"(b) Not contain more than 200 ml liquefied flammable gas the vapour pressure of which shall not exceed 1000 kPa at 55 °C; and".</p>	
<p><b>INF.12</b></p>	<p><i>GHS classification of dangerous goods most commonly carried: comparison between transport classification and EU CLP Regulation (Regulation (EC) No 1272/2008) (Secretariat)</i></p> <p>This document has also been submitted to the GHS Sub-Committee as Inf.7. The paper compares the TDG classification for specifically names substances in the UN 16<sup>th</sup> Rev. Ed. to their classification under the EU CLP Regulation (which implements GHS). The Secretariat suggests that the TDG and GHS Sub-Committee's consider the differences identified with the purpose of enhancing consistency between the classifications under both sets of regulations.</p>	<p>There were no proposals in this paper. While we recognize the extensive efforts by the Secretariat in preparing this comparison, we are cautious in expressing support of any action based on this comparison to be undertaken by the TDG or GHS Sub-Committees. There is currently no GHS "list" similar to the Dangerous Goods List in the Model Regulations. The GHS established criteria and has not adopted or recognized any specific listing, and the classification system in the Model Regulations has already been aligned to reflect the GHS criteria as appropriate. Any proposals to amend the classification of a specifically listed substance in the Dangerous Goods List should be handled on a case-by-case basis, and not based on a comparison to the EU CLP Regulation.</p>
<p><b>INF.13</b></p>	<p><i>PATRAM2010 Symposium hosted by the Department for Transport (DfT) of the United Kingdom in cooperation with the International Atomic Energy Agency (IAEA), the International Maritime Organisation (IMO) and the World Nuclear Transport Institute (WNTI) (UK)</i></p> <p>In this paper the UK advises the TDG SC of the</p>	<p>There were no proposals in this paper.</p>

	<p>upcoming PARTAM 2010 symposium. The PATRAM symposia are held every three years and foster the exchange of information on the future of packaging and transport of radioactive materials and, therefore, present a unique opportunity for the entire professional community including industry, government, inter-governmental and research organisations to look to the horizon in relation to these issues.</p>	
<p><b>INF.15</b></p>	<p><i>4.1.4.1 P200 Materials compatibility requirements for gases in pressure receptacles (ISO)</i></p> <p>In this paper ISO recalls that the Sub-Committee considered at its previous session the following papers on the compatibility of gases with pressure receptacles constructed from aluminium alloy;  ST/SG/AC.10/C.3/2009/30 (United Kingdom),  UN/SCETDG/36/INF.29 (United Kingdom) and  UN/SCETDG/36/INF.48 (EIGA). The proposals were referred to a lunchtime working group which reported back with document UN/SCETDG/36/INF.53. The proposals of the report were adopted with the exception of the list in paragraph 5 which was placed in square bracket in view of the on-going discussions in the ISO working group currently revising ISO 11114-1 “Transportable gas cylinders -- Compatibility of cylinder and valve materials with gas contents -- Part 1: Metallic materials.”. Those discussions have been completed and as a result ISO recommends adding “a” (prohibiting use of aluminum alloy cylinders) to the listing in P200 for the following gases:</p> <p style="padding-left: 40px;">UN 1741 BORON TRICHLORIDE  UN 1008 BORON TRIFLUORIDE  UN 2189 DICHLOROSILANE  UN 1052 HYDROGEN FLUORIDE,  ANHYDROUS  UN 2418 SULPHUR TETRAFLUORIDE  UN 1076 PHOSGENE</p>	<p>We supported this proposal.</p> <p><b>Result:</b> The proposal was adopted.</p>

UN 1859 SILICON TETRAFLUORIDE

In addition, ISO advises the TDG SC of the following text under consideration for inclusion in ISO 11114-1:

*Specific chlorinated hydrocarbon solvents such as 1,1,1 trichloroethane can react vigorously in the presence of aluminium, but this is prevented in practice by adding inhibitors. These stabilizing inhibitors can be rendered ineffective when different solvents are mixed together because differing systems of stabilization are used and each inhibitor can render the other ineffective. Furthermore, when such solvents are present in small concentrations in gas mixtures or in liquid solvents such as toluene the effectiveness of the inhibitors is significantly reduced.*

*Filling gas cylinders with chlorinated hydrocarbon solvents known to potentially react with aluminium should be avoided, unless the filler has the necessary specialized knowledge and experience using appropriate internal cylinder surface conditions. Packaging tri-and tetra-chlorinated hydrocarbon solvents and mixtures of chlorinated hydrocarbons can require particular attention.*

*Examples of such substances known to potentially react with aluminium are: 1,1,1-trichloroethane, 1,1-dichloroethane, 1,1,1,2 tetrachloroethane, trichloromethyl benzene, trichloroacetyl chloride, methyl chloride, methylene chloride, trichloroethylene, 1,1,2-trichloroethane, 1,1,2,2-tetrachloroethane, 1,1,1,2-tetrachloroethane.*

<p><b>INF.18</b></p>	<p><i>Assignment of SP 274 (CEFIC)</i>          Previously the Sub-Committee agreed to add SP 274 (requiring a technical name) to a number of entries in the Dangerous Goods List. In this paper CEFIC proposes to include rationale in the Part 3 of the Guiding Principles for the development of the Model Regulations. These Guiding Principles are referred to by the Sub-Committee when making decisions relative to amending the Model Regulations and are intended to ensure consistency in the development of the Regulations.</p>	<p>We are not opposed to including guidance in the Model Regulations to address the assignment of SP 274.</p> <p><b>Result:</b> The proposal was not considered due to time constraints and will be considered at the following session.</p>
<p><b>INF.19</b></p>	<p><i>Aerosols (UN 1950) – Maximum internal pressure at 50°C (FEA)</i>          In this paper FEA provides information relative to their efforts to amend the Aerosol Dispensers Directive 75/324/EEC. FEA also intends to address the issue in the transport regulations subsequent to obtaining a favorable outcome in amending the EEC standard. The major changes are related to increasing the maximum pressures authorized within aerosols.</p>	<p>There were no proposals in this paper. We are monitoring the proposed amendments as they may be considered by the UN TDG SCOE in the future.</p>
<p><b>INF.20</b></p>	<p><i>Aerosols (UN 1950) – Plastic aerosols (FEA)</i>          In this paper FEA provides information relative to their efforts to introduce requirements for plastic aerosols within the Aerosol Dispensers Directive 75/324/EEC.</p>	<p>There were no proposals in this paper. We recently adopted provisions for plastic aerosols within the HMR and are interested in ensuring global compatibility of standards for aerosols. We are monitoring the proposed amendments as they may be considered by the UN TDG SCOE in the future.</p>
<p><b>INF.21</b></p>	<p><i>Proposals to update references to ISO standards (EIGA)</i>          In this paper EIGA proposes to update references in the UN Model Regulations relevant to the ISO 10156 standard (relevant to oxidizing gases). The proposed changes are as follows:</p> <ul style="list-style-type: none"> <li>• In 2.2.2.1(a)(ii), and in 2.2.3(a) and (d): change ISO 10156:1996 into ISO 10156:2010; and</li> <li>• In 2.2.3(d) delete the reference to ISO 10156-2:2005.</li> </ul>	<p>We support this proposal.</p> <p><b>Result:</b> The proposal was not considered due to time constraints and will be considered at the following session.</p>

<p><b>INF.22</b></p>	<p><i>Impact of the speed in pronouncing speeches on the quality of the interpretation services provided to official UN meetings (Secretariat)</i></p> <p>In this paper the Secretariat reproduces a memo sent broadly to various departments within the UN regarding interpretation services. The memo reminds delegates to be mindful of the speed at which they speak to ensure high quality interpretation is accomplished.</p>	<p>There are no proposals in this paper.</p>
<p><b>INF.23</b></p>	<p><i>Classification of Class 3 viscous liquids in packing group III (IATA)</i></p> <p>In this paper, IATA proposes a number of editorial amendments to the Model Regulations and to the UN Manual of Tests and Criteria relevant to the classification of flammable liquids in PG III on the basis of their viscosity.</p>	<p>We are not opposed to the amendments proposed; they are editorial in nature and ensure the text is clear and consistent with other provisions of the Model Regulations.</p> <p><b>Result:</b> The proposal was not considered due to time constraints and will be considered at the following session.</p>
<p><b>INF.24</b></p>	<p><i>Use of term “conveyance” in Special Provisions 289 and 356 (IATA)</i></p> <p>In this paper IATA proposes to amend Special Provisions 289 and 356 to eliminate the use of the word “conveyance”.</p> <p>289 Air bag inflators, air bag modules or seat-belt pretensioners installed in <del>conveyances</del> <u>motor vehicles, boats, aircraft, etc.</u> or in completed <del>conveyance</del> components such as steering columns, door panels, seats etc. are not subject to these Regulations.</p> <p>Revise Special Provision 356 as follows:</p> <p>356 Metal hydride storage system(s) installed in <del>conveyances</del> <u>motor vehicles, boats, aircraft, etc.</u> or in <del>completed conveyance components for or</del> <u>fuel tanks</u> intended to be installed in <del>conveyances</del> <u>motor vehicles, boats, aircraft, etc.</u> shall be approved by the competent authority before acceptance for transport. The transport document shall include an indication that the package was approved by the appropriate national authority or a copy of the approval shall</p>	<p>We recall that the provision previously referred to vehicles and was expanded to ensure other means of conveyance were included. We are not convinced this proposal is necessary as the term conveyance is defined in 1.2 to include vehicles, vessels and aircraft. The IATA proposal would simply list these as examples and replace the term vessel with “boats”.</p> <p><b>Result:</b> The proposal was not considered due to time constraints and will be considered at the following session.</p>

	accompany each consignment.	
<b>INF.25</b>	<p><i>Technical (pathogen) name requirements for Category A infectious substances (IATA)</i></p> <p>Currently the Category A and B infectious substance entries are not assigned to SP 274 (requiring a technical name). Instead they are assigned SP 318 which addresses the issue. IATA proposes to reinstate SP 274 and amend SP 318 as follows:</p> <p style="padding-left: 40px;">318        <del>For the purposes of documentation, the proper shipping name shall be supplemented with the technical name (see 3.1.2.8). Notwithstanding the requirements of special provision 274</del> technical names need not be shown on the package. When the infectious substances to be transported are unknown, but suspected of meeting the criteria for inclusion in category A and assignment to UN 2814 or UN 2900, the words “suspected category A infectious substance” shall be shown, in parentheses, following the proper shipping name on the transport document, but not on the outer packagings.</p>	<p>We are not convinced this proposal is necessary. We believe it is more user-friendly to include all of the applicable requirements in a single provision, rather than reinstate SP 274 only to modify its applicability in a separate provision (i.e. apply it to documentation only). However, we are open to considering other views.</p> <p><b>Result:</b> The proposal was not considered due to time constraints and will be considered at the following session.</p>
<b>INF.31</b>	<p><i>UN Test O.1: Test for oxidizing solids (Secretariat on behalf of IGUS)</i></p> <p>“According to the preliminary results of the interlaboratory comparison the suggestion of the working group will be to replace the reference substance by calcium peroxide (CaO<sub>2</sub>). Calcium peroxide is classified as oxidizing solid, category 1, for its skin irritation, category 2, and its serious eye damage, category 1, and therefore is beneficial compared to the current reference substance potassium bromate due to its carcinogenicity.”</p>	<p>Any proposed changes to the test method should be carefully reviewed. We need to coordinate with tech, our GHS IAWG and classification test labs in the US.</p> <p><b>Result:</b> This proposal was supported in principle and deferred to GHS for further consideration. The GHS Sub-Committee agreed to address the issue at the December session to allow time for interested delegations to review the implications of the proposal.</p>
<b>INF.32</b>	<p><i>4.1.4.1 P200 Materials compatibility requirements for gases in pressure receptacles – Further comments on UN/SCETDG/37/INF.15, paragraphs 5 to 7 (ISO)</i></p> <p>“The decision of ISO/TC58/WG7 therefore, is not to include the warning shown in italics in paragraph 6 of informal document INF.15 in the standard ISO 11114-1</p>	<p>There were no proposals in this paper.</p> <p><b>Result:</b> This paper was not considered due to time constraints and will be considered at the following session.</p>

	and it also recommends that with the changes of wording adopted at the thirty-sixth session and the current application of special packing provision "a" in P200, the risks of a repeat incident are addressed satisfactorily in the Model Regulations.”	
<b>INF.34</b>	<i>Comments on ST/SG/AC.10/C.3/2010/31 (United States of America), a proposed new DDT Test and Criteria for Flash Compositions (UK)</i>	There were no proposals in this paper. The UK and other delegations expressed interest in reviewing the appropriateness of an alternative flash composition test method.
<b>INF.35</b>	<i>Comments on ST/SG/AC.10/C.3/2010/29 (USA) Criteria for excluding articles from Class 1 (UK)</i>	There were no proposals in this paper. We worked with the UK to address their concerns, and our paper was adopted (see discussion on 2010/29).
<b>INF.37</b>	<i>New Special Provision for Potassium/Sodium Nitrates: Decisions Taken by the IMO (EFMA)</i>	There were no proposals in this document. The Sub-Committee agreed additional work is needed to revise the oxidizer classification testing provisions and to enhance classification provisions for oxidizers.
<b>INF.40</b>	<i>Additional criteria for 1.4 classification (Canada)</i> In this paper, Canada raises a number of issues relative to the criteria for classification of 1.4S explosives.	There were no proposals in this paper. The paper was considered by the explosives working group, and Canada agreed to bring more specific information for consideration by the working group.
<b>INF.41</b>	<i>On the use of the minimum burning pressure test as an alternative Series 8 Test (Canada)</i> In this paper Canada suggests that the Sub-Committee consider an alternative test method to that currently required by Test Series 8 (large scale burning test for classification of ammonium nitrate).	There were no proposals in this paper. The explosives working group agreed that alternative test methods should be considered and invited interested experts to participate in this review.
<b>INF.43</b>	<i>Assignment of Special Provision 223</i> The Sub-Committee may wish to consider, in the light of the discussions that took place at the last session (ST/SG/AC.10/C.3/72, paras 99 to 102) and new information provided in INF.37 and INF.46 in this informal document, whether the current RID/ADR/ADN approach is appropriate and should be reflected in the Model regulations (by assigning special provision 223 to the relevant entries) or, on the contrary, RID, ADR and ADN should be amended to follow the UN Model Regulations of assignment of special provision 223 on a	No decision was taken on this proposal. This issue will be further considered in the next biennium.

	case-by-case basis.	
<b>INF.44</b>	<p><i>Classification of potassium nitrate, sodium nitrate and mixtures thereof (Netherlands)</i></p> <p>The Netherlands proposes not to assign a special provision comparable to SP964 to UN numbers 1486, 1498 and 1499.</p>	There were no proposals in this document. The Sub-Committee agreed additional work is needed to revise the oxidizer classification testing provisions and to enhance classification provisions for oxidizers.
<b>INF.48</b>	<p><i>Permissive use of the EHS mark</i></p> <p>DGAC proposes to add the following sentence at the end of special provision 331 and 5.2.1.6.1:</p> <p>"The mark may also be applied to packages containing other substances transported under UN 3077 or UN3082 based on a designation by the competent authority of the country of origin, transit or destination or that are wastes covered under the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal (see 2.9.2).".</p>	This paper was not considered due to lack of time.

<p><b>INF.51</b></p>	<p><i>Amendments to Chapter 2.5 of the GHS : Gases under pressure (Secretariat)</i></p> <p>8. Amend the definition in 2.5.1 as follows (inserted text is shown in bold, underlined):</p> <p style="padding-left: 40px;"><i>“Gases under pressure are gases which are contained in a receptacle at a pressure of 200 kPa (gauge) or more <b><u>at 20°C</u></b>, or which are liquefied or liquefied and refrigerated”</i></p> <p>9. Amend the introductory sentence in 2.5.2 to read as follows (inserted text is shown in bold, underlined):</p> <p style="padding-left: 40px;"><i>“Gases <b><u>under pressure</u></b> are classified, according to their physical state when packaged, in one of four groups in the following table:”</i></p> <p>10. Replace 2.5.4.1 with the following (inserted text is shown in bold, underlined):</p> <p style="padding-left: 40px;"><b><u>2.5.4.1 Decision logic</u></b></p> <p style="padding-left: 80px;">Classification can be made according to decision logic 2.5.</p> <p style="padding-left: 80px;"><i>Decision logic 2.5 for gases under pressure</i></p>	<p>I am leery about this. We need to look at carefully and get tech input.</p>
<p><b>INF.52</b></p>	<p><i>Membership of the sub-committees (Switzerland and Russian Federation)</i></p> <p>Following the new appointments, 29 countries are now full members of the TDG Sub-Committee and 36 countries are full members of the GHS Sub-Committee.</p>	<p>I had no idea Switzerland was not a member.</p> <p><u>Result: They are now.</u></p>