
Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

17 November 2021

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-ninth session

Geneva, 29 November-8 December 2021

Item 9 of the provisional agenda

Guiding principles for the Model Regulations

Proposal to add to the Guiding Principles, a line in table 4.2 of packing assignments with an explanatory note ^b following the assignment of UN 3550 to cobalt dihydroxide powder for continued transport in flexible Intermediate Bulk Containers (IBC)

Submitted by the Responsible Packaging Management Association of Southern Africa (RPMASA) and the International Confederation of Plastic Packaging Manufacturers (ICPP)

Proposal to add wording to the Guiding Principles for the development of the Model Regulations

1. At the fifty-seventh session in December 2020, the Sub-Committee agreed to assign UN 3550 to “COBALT DIHYDROXIDE POWDER, containing ≥ 10 % respirable particles”, and to defer further discussion to firm up proposed new wording for inclusion in the Guiding Principles to the 2021-2022 biennium.
2. RPMASA and ICPP were invited to continue work on a revised proposal for amendments to the Guiding Principles and circulated an invitation to the members of the intersessional working group to confirm who wished to assist continue that work.
3. Following intersessional exchanges with interested experts, a revised proposal was submitted in informal document INF.29 (58th session). However, with the short meeting there was limited time for discussion on this paper, and most delegations indicated there was no need to add wording to Part 2, and the wording for Part 4.2 of the Guiding Principles needed more work.

Proposal for additional and explanatory wording to Part 4.2 of the Guiding Principles

4. There was general support for inclusion of a new line entry in Table 4.2 together with a note, however there was no consensus on the wording of the note.
5. A further request for inputs was circulated in last September to those experts that had confirmed they would like to continue this work for appropriate explanatory wording, so as to prevent reopening this debate in future.
6. The Sub-Committee is invited to consider the following addition to Table 4.2 and the two possible options for a note ^b to qualify this entry after the table.

Proposal to add to Table 4.1

7. Add a new line entry in table 4.1 Packing Instruction assignments for IBCs under Division 6.1 solids without subsidiary risk including a qualifying note ^b, as follows:

“UN 3550 COBALT DIHYDROXIDE POWDER, containing $\geq 10\%$ respirable particles - PG I and IBC07 ^b”

Proposed wording for note ^b at the end of the table to qualify why it was agreed to assign this.

Option 1: Wording for new note ^b:

“^b For more details on the assignment of IBC07 (for transport in FIBC's of 13H3 or 13H4) with "sift-proof liners to prevent any egress of dust during transport" to UN 35XX COBALT DIHYDROXIDE POWDER, Division 6.1, PG I, please consult working paper ST/SG/AC.10/C.3/2020/21/Rev.1 as amended by informal document INF.45 of the fifty-seventh session of the TDG Sub-Committee.”

Option 2: Alternate wording for note ^b:

“^bNote the unique properties of cobalt dihydroxide powder, which include that this material is: hygroscopic, heavy with a density of 3.6 g/cm^3 , has zero vapour pressure and tends to clump and not remain airborne, plus the airborne fraction has a low respirability value of only 0.8 % modelled to deposit in the deep lung. Acknowledging these unique properties, the Sub-Committee agreed to authorise UN 35XX to be packed in flexible intermediate bulk containers, provided these include a sift-proof liner, and are transported in closed transport units.”
