

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

Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 16 of the provisional agenda

Other business

Comprehensive approach following reclassification of existing entries in the Dangerous Goods List (DGL)

Transmitted by the expert from Canada

I. Introduction

1. The reclassification of existing entries for dangerous goods has become more prevalent in recent years. Currently, the Sub-Committee of Experts on the Transport of Dangerous Goods analyses each reclassification of existing entries of dangerous goods independently. Therefore, following a reclassification, different approaches are taken to determine the new transport provisions, especially related to packaging.

II. Discussion

2. Canada believes that a more comprehensive and systematic approach to address these reclassifications would be beneficial. In certain cases, based on the lack of incidents in the transport of these substances, the Sub-Committee agrees to maintain the previously permitted packaging options while in other cases, the packaging requirements are modified to align with the new classification. Furthermore, changes in transport provisions can lead to the adoption of a transitional period while in other cases, no transitional period is provided.

3. Canada believes that, to avoid different outcomes following reclassification for existing entries, the Sub-Committee should establish a clear and comprehensive approach to determine when the packaging requirements can be maintained and when they need to be aligned with the new classification; and when transitional periods are required. The following questions could serve as a starting point for the Sub-Committee:

- (a) What criteria should be used to determine if packaging requirements should be modified and if transitional periods are required?
- (b) What factors should be considered?
 - (i) Applicability or feasibility of the new packaging?
 - (ii) Economic impact?
 - (iii) Accident or incident data?
 - (iv) Others?

4. Noting that exceptions will always exist and may require a targeted approach, consideration should also be given to including a framework in the *Guiding Principles* addressing the general approach to be taken following the reclassification of existing entries in the Dangerous Goods List of Chapter 3.2 of the *Model Regulations*. This is important to avoid having divergent approaches to the outcome of reclassification.

5. This informal proposal supports sustainable development goal 6, “peace, justice, and strong institutions.” Specifically, adopting a more comprehensive and systematic approach to reclassification in the *Model Regulations* enables the creation of more consistent regulations, thus contributing to the implementation of target 16.6 to “develop effective, accountable and transparent institutions at all levels”.

III. Proposal

6. Request to discuss and develop a comprehensive approach following the reclassification of existing entries in the Dangerous Goods List during the current biennium.

7. Based on the interest of the Sub-Committee a lunch time or intersessional working group could be held.
