

COSTHA Review – Preliminary Consultation on International Harmonization Updates to the *Transportation of Dangerous Goods Regulations*

Proposal 1 – Alignment with International Requirements		Alignment with UN Model Regs	Alignment with 49 CFR	Alignment with other regulations
1.1. How to Write a Shipping Name	<p>1.2.1. Dangerous Goods Description</p> <ul style="list-style-type: none"> Proposal to include the following qualifying words for use with proper shipping names in 1.3(2)(d): “MOLTEN”, “STABILIZED” and “TEMPERATURE CONTROLLED”. 	Yes	Yes No issue, but TC must be made aware that 172.101(c)(9) requires the word “waste” be used with the proper shipping name	Yes
1.2. Requirements for Shipping Documents	<p>1.2.1. Dangerous Goods Description</p> <ul style="list-style-type: none"> Proposal to include the following qualifying words for use with proper shipping names in 3.5(1)(c): “MOLTEN”, “STABILIZED” and “TEMPERATURE CONTROLLED”. 	Yes	Yes No issue, but TC must be made aware that 172.101(c)(9) requires the word “waste” be used with the proper shipping name	Yes
	<p>1.2.2. Requirements for Dangerous Goods Safety Marks</p> <ul style="list-style-type: none"> Proposal to add text clarifying that information not specifically identified as required in the description of the dangerous goods may not be included on shipping papers. 	Yes	Yes No issue, and it does make a reference to proposal above	Yes

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1.2.3. Borders on Labels and Placards	<ul style="list-style-type: none"> Proposal to clearly allow the display of labels / placards with a dotted or solid outer border line would be added. 	Yes	Yes No issue	Yes
1.2.4. Location of Line inside the Edge of Labels	<ul style="list-style-type: none"> Proposal to add the word “approximately” before 5 mm... 	???	Proposed in November 2018 No issue	Yes
1.2.5. Size of Labels	<ul style="list-style-type: none"> Proposal to remove “irregular shape” and allow reduced labels “if size of the package so requires” (to allow all to be displayed on the same viewing plane of moc). 	Yes	Yes No issue	Yes
1.2.6. Labels on Cylinders	<ul style="list-style-type: none"> TC is looking at two options to allow reduced labels on shoulder of cylinders, even if a full size labels would fit on the side of the cylinder, and is requesting comments: <ul style="list-style-type: none"> Option 1 would allow labels on any type of cylinder to be reduced in size in accordance with ISO 7225:2005 (down to 10 mm x 10 mm). Option 2 would allow labels to be reduced in size in accordance with ISO 7225:2005 only for non-refillable UN pressure receptacles, while labels on other cylinders containing Class 2, Gases, would need to comply with the 30 mm size limit that is currently in the regulations, with the option of marking in accordance with CGA C-7. 	Option 1: Yes Option 2: Partly	Option 1: Partly Option 2: Yes TC is requesting comments	N/A

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	<p>1.2.7 Display of UN Numbers on a Means of Containment</p> <ul style="list-style-type: none"> Proposal to introduce minimum size requirements for the UN number on small moc (non-bulk packaging) and IBC with 	<p>Yes</p>	<p>Yes</p> <p>No issue, but may comment on format of proposed text in 4.8(1), starting with 12 mm and going down...</p>	<p>Yes</p>
	<p>1.2.8 Overpack Markings</p> <ul style="list-style-type: none"> Proposal to require that all DG safety marks be displayed on overpack (see 4.10.1), including MP mark, Li battery mark, orientation arrows and such, while keeping the exception that markings are not required if they can be seen through the overpack. 	<p>Yes</p>	<p>Yes</p> <p>No issue</p>	<p>Yes</p>
	<p>1.2.9 Display of Subsidiary Class Placards</p> <ul style="list-style-type: none"> Section 4.15.1 of the TDGR requires subsidiary class placards to be displayed on large means of containment if the dangerous goods require an emergency response assistance plan (ERAP) and have subsidiary classes of Class 1, Class 4.3 or Class 6.1. It also requires the Class 8, Corrosives, placard for UN2977, RADIOACTIVE MATERIAL, URANIUM HEXAFLUORIDE, FISSILE or UN2978, RADIOACTIVE MATERIAL, URANIUM HEXAFLUORIDE, non-fissile or fissile excepted, when these dangerous goods require and ERAP. In a recent amendment to the TDGR, the entries for UN2977 and UN2978 were updated to include subsidiary Class 6.1, Toxic Substances, in addition to subsidiary Class 8, to align with the 19th edition of the UN Recommendations. Proposal to amend 4.15.1 to refer to the Class 6.1 placard as well as the Class 8 placard for their subsidiary classes to reflect the updated classification of UN2977, RADIOACTIVE MATERIAL, URANIUM HEXAFLUORIDE, FISSILE or UN2978, RADIOACTIVE MATERIAL, URANIUM HEXAFLUORIDE, non-fissile or fissile excepted. 	<p>Partial</p> <p>UN Model Regs require placards for all subsidiary hazards</p>	<p>Partial</p> <p>No issue, even though TDGR requires subsidiary placards for DG with and ERAP and those which have a Class 1 subsidiary, as 172.505(d) allows subsidiary hazard placards to be shown even when not required.</p>	<p>Partial</p> <p>IMDG Code require placards for all subsidiary hazards</p>

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	<p>1.2.10 Orientation Arrows</p> <ul style="list-style-type: none"> Proposal to require the display of orientation arrows on means of containment that contain liquid dangerous goods. 	Yes	Yes No issue, but ensure TC mentions the requirement is only applicable for combination packaging	Yes
<p>1.3. UN Numbers, Shipping Names and Related Provisions</p>	<p>1.3.1 New UN Numbers</p> <ul style="list-style-type: none"> Proposal to add new entries for UN3535, TOXIC SOLID, FLAMMABLE, INORGANIC, N.O.S., and UN3536, LITHIUM BATTERIES INSTALLED IN CARGO TRANSPORT UNIT, as well as a definition for “cargo transport unit” (w/ same meaning as in UN Model Regs). 	Yes	Yes	Yes
	<p>1.3.2 Changes to Shipping Names</p> <ul style="list-style-type: none"> Proposal to amend the following proper shipping names: <ul style="list-style-type: none"> UN1057, LIGHTER REFILLS containing flammable gas and capable of passing the tests specified in the Lighters Regulations; or LIGHTERS containing flammable gas and capable of passing the tests specified in the Lighters Regulations UN3302, 2-DIMETHYLAMINOETHYL ACRYLATE, <u>STABILIZED</u>, 6.1, II, <u>SP 155</u> 	Yes, but check spelling...	Not yet, but...	Yes
	<p>1.3.3 Packing Groups</p> <ul style="list-style-type: none"> Proposal to remove packing groups for the following dangerous goods: <ul style="list-style-type: none"> Class 1, Explosives (UN0004 to UN0150) UN1327, BHUSA, HAY or STRAW, regulated only when transported by vessel (not regulated in the US) Class 5.2, Organic Peroxides (UN3101 to UN3120) Self-reactive liquids and solids in Class 4.1 (UN3221 to UN3240) UN3316, CHEMICAL KIT or FIRST AID KIT 	Yes	Yes, except for UN1327, but it’s ok...	Yes

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1.4 Amendments to Special Provisions and New Special Provisions	1.4.1 Special Provision 16 - Technical Names <ul style="list-style-type: none"> Proposal to allow up to two technical names 	Yes	No limit in 49 CFR, but it could encourage DOT	Yes
	1.4.2 Special Provision 34 – Exemption for Lithium Cells and Batteries <ul style="list-style-type: none"> Proposal to amend the exemption for small Li batteries in SP 34 to reflect SP 188 in the UN Model Regulations 	Yes	Partly, as it does not contain the exception for medium Li batteries found in 173.185(c)	Yes
	1.4.3 Special Provision 39 – Exemption for Wet Batteries <ul style="list-style-type: none"> Proposal to amend SP 39 to also except UN2800, BATTERIES, WET, NON-SPILLABLE, intended for disposal under the special provision. 	Yes	Not yet...	Yes
	1.4.4 Special Provision 41 – Packing Instruction for Oxygen Generators <ul style="list-style-type: none"> Proposal to amend SP 41 to require UN3356, OXYGEN GENERATOR, that are meant to be activated during transport to be packaged in a MOC that is inside another MOC... to better reflect P500 of the UN Model Regulations 	Yes	Not sure if it aligns or not...	Yes
	1.4.5 Special Provision 56 – Exemption for Solids containing flammable liquids <ul style="list-style-type: none"> Proposal to allow the use of flexible intermediate bulk containers (FIBC), such as 13H3 and 13H4, for the transportation of DG assigned to UN3175, SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S. (this would actually incorporate several equivalency certificates into the TDGR) 	No Suggest Canada submit a proposal to UNSCETDG	UN3175 currently assigned IBC6 which does not allow flexible IBC	No

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<p>1.4.6 Special Provision 65 – Chemical Kit or First Aid Kit</p> <ul style="list-style-type: none"> Proposal to amend SP 65 to also permit UN3316, CHEMICAL KITS and FIRST AID KITS, to contain substances that may be shipped as excepted quantities. This would allow for some substances in Class 6.1, Toxic Substances, PG I, and Class 3, Flammable Liquids, PG I, to be shipped in chemical kits and first aid kits, in addition to those already permitted that meet the allowance for limited quantities. 	Yes	Not yet...	Yes
<p>1.4.7 Special Provision 105 - Classification of 1.4S Explosives</p> <ul style="list-style-type: none"> Proposal to assign SP 105 to: UN0349 ARTICLES, EXPLOSIVES, N.O.S., UN0367 FUZES, DETONATING, UN0384 COMPONENTS, EXPLOSIVE TRAIN, N.O.S., and UN0481 SUBSTANCES, EXPLOSIVE, N.O.S., to better align with SP 247 of the UN Model Regulations. 	Yes	Not sure if it aligns or not...	Yes
<p>1.4.8 Special Provisions 112, 113 and 114 – Classification of Ammonium Nitrate Based Fertilizer</p> <ul style="list-style-type: none"> Proposal to repeal SP 112 and to amend SP 113 & 114, regarding technical requirements for the classification of ammonium nitrate based mixtures and instead reference section 39 of Part III of the Manual of Tests and Criteria which now contains the classification criteria. Those SP are currently assigned to UN2067, AMMONIUM NITRATE BASED FERTILIZER, and UN2071, AMMONIUM NITRATE BASED FERTILIZER. This would reflect the changes made to SP 186, 193 and 307 in the 20th edition of the UN Model Regulations. SP 114 would continue to apply for all modes of transport, even though the UN special provision continues to apply only to transport by air and vessel, as TC feels the dangers posed by these dangerous goods are significant. 	Mostly Except for SP 114 applying to all modes	Not sure if it aligns or not...	Yes
<p>1.4.9 Special Provision 132 - Stabilization of Fish Meal</p> <ul style="list-style-type: none"> Proposal to amend SP 132 for UN2216, FISH MEAL, STABILIZED or FISH CRAP, STABILIZED, to reduce the level of ethoxyquin to 50 ppm to reflect the change to SP 308 of the UN Model Regulations. 	Yes	No	Yes

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<p>1.4.10 Special Provision 137 - Damaged or Defective Lithium Batteries</p> <ul style="list-style-type: none"> The transport of damaged and defective cells and batteries that are liable to rapidly disassemble, dangerously react, or produce a flame, a dangerous evolution of heat, or dangerous emissions under normal conditions of transport is currently forbidden under SP 137 in the TDGR and will remain forbidden unless an EC is granted on a case by case basis. Proposal to amend SP to display the words “DAMAGED/DEFECTIVE” or “ENDOMMAGÉES/DÉFECTUEUSES” to align SP 376 of the UN Model Regulations. 	<p>Mostly</p> <p>TC would use the changes in SP376 of the UN Model Regulations to craft EC as necessary</p>	<p>Mostly</p>	<p>Mostly</p>
<p>1.4.11 Special Provisions 141 and 153 – Limited Quantities</p> <ul style="list-style-type: none"> Proposal to amend SP 141 and 153 to allow LQ of dangerous goods in UN3269, POLYESTER RESIN KIT, liquid base material; UN3316, CHEMICAL KIT or FIRST AID KIT; and UN3527, POLYESTER RESIN KIT, solid base material, rather than EQ to align with the UN Model Regulations 	<p>Yes</p>	<p>Not yet...</p>	<p>Yes</p>
<p>1.4.12 Special Provisions 67, 93, 156 and 157 – Classification of Vehicles</p> <ul style="list-style-type: none"> Proposal to repeal SP 67, 93, 156 & 157, currently assigned to UN3166 and UN3171, and combine them into a new SP to better reflect the new SP 388 from the UN Model Regulations. 	<p>Yes</p>	<p>Not sure if it aligns with SP 134 & 135...</p>	<p>Yes</p>
<p>1.4.13 Special Provision 167 – Dangerous Goods in Apparatus or Machinery</p> <ul style="list-style-type: none"> Proposal to amend SP 167 assigned to UN3363 to clarify the text as was done in SP 301 of the UN Model Regulations 	<p>Yes</p>	<p>Not sure if it aligns with SP 136...</p>	<p>Yes</p>
<p>1.4.14 New Special Provision – Lithium Batteries in Cargo transport Units</p> <ul style="list-style-type: none"> Proposal to add a new SP assigned to new UN3536, LITHIUM BATTERIES INSTALLED IN CARGO TRANSPORT UNIT, to reflect new SP 389 in the UN Model Regulations. 	<p>Yes</p>	<p>Not yet...</p>	<p>Yes</p>

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	1.4.15 New Special Provision - Vehicles Transported by Vessel <ul style="list-style-type: none"> Proposal to add a new SP to UN3166 & UN3177 to provide exemptions for vehicles transported by vessel and align with SP 961 & 962 of the IMDG Code. 	N/A	Yes	Yes
	1.4.16 New Special Provision - Classification of Hybrid Batteries <ul style="list-style-type: none"> Proposal to add a new special provision that reflects UN special provision 387 and is applicable to UN3090, UN3091, UN3480 and UN3481 for the classification of hybrid Li batteries that contain both primary Li metal cells and rechargeable Li ion cells, 	Yes	Not yet...	Yes
1.5 Change to the List of Marine Pollutants	<ul style="list-style-type: none"> Proposal to delete the indication that 1-dodecene is a MP in Schedule 3 as the IMDG Code has deemed it not to be a marine pollutant. 	N/A	Not yet...	Yes
1.6 Changes due to the Updated TP 14850 Standard for Small Containers	1.6.1 Updated Reference to the Standard <ul style="list-style-type: none"> Proposal to update the reference to TP 14850 to reflect the latest edition of the standard Keep in mind that the updated reference could also be the “new” CGSB.43-150 as TP 14850 is being migrated to a CGSB standard. 	Yes	Not sure if it aligns yet...	Yes
	1.6.2 Packing Instructions <ul style="list-style-type: none"> Proposal to delete SP 123, 137 and 138 as new packing instructions (P005 for engines and machinery and P908, P909, LP904 and P910, for lithium ion and lithium metal batteries and lithium ion and lithium metal batteries packed in or with equipment) have been incorporated into the new edition of TP 14850 (or CGSB.43-150). 	Yes	Not sure if it aligns yet...	Yes
	1.6.3 Marking of Salvage Containers <ul style="list-style-type: none"> TP14850 has been amended to require the marking of salvage containers. 	Yes	Yes	Yes

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<p>1.6.4 Dangerous Goods List</p> <ul style="list-style-type: none"> DGL in Appendix A of the standard has been updated to reflect new entries that were added in the 20th edition of the UN Recommendations. 	Yes	N/A	Yes
<p>1.6.5 Batteries in Large Means of Containment</p> <ul style="list-style-type: none"> Proposal to amend section 5.14, Large Means of Containment, to reference TP 14850 to allow consignors transporting batteries in non-standardized means of containment exceeding 450 L would be able to make use of packing instruction P801 under TP14850 which applies to non-standardized containers such as crates and pallets, and is not restricted to volumes under 450 L. 	Yes	Not sure if it aligns	Yes
<p>1.6.6 Periodic Retest requirement</p> <ul style="list-style-type: none"> The new edition of the TP 14850 Standard introduces the requirement for container manufacturers to retest representative samples of the registered container design every five years to ensure that all containers manufactured since the initial design testing are still capable of meeting the UN performance tests. The standard provides an exemption from the periodic retesting, container manufacturers of codes 1A, 1B, 1H, 1N, 3A, 3B, 3H, 6HA, 6HB and 6HH who must have in place a registered ISO 9001 quality management system for their TC registration. 			
<p>1.6.7 Reconditioning of Drums</p> <ul style="list-style-type: none"> The requirements for the reconditioning of steel or plastic drums used for transporting dangerous goods that are liquid (in Class 3, 4, 5, 6.1, 8 or 9) before reuse have been included in the new TP 14850, thus section 5.12(2) would be repealed. 			

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Proposal 2 – Modernizing Part 4 (Dangerous Goods Safety Marks)		Alignment with UN Model Regs	Alignment with 49 CFR	Alignment with other regulations
2.1 Text Displayed on Labels and Placards	<p>Hazard class labels / placards with text currently not allowed under the TDGR resulting in additional costs and compliance burden for businesses, thus three proposals:</p> <ul style="list-style-type: none"> • Option 1: Allow labels / placards with text • Option 2 replaces labels / placards with only those that with text • Option 3 maintains the status quo (text cannot be displayed on labels / placards) • TC seeks your feedback on the benefits and possible negative impacts these proposals could have on your respective sector. This is an opportunity to hear from you, stakeholders, first responders, enforcement personnel and the public in general. We encourage you to share your opinions and your own proposals to simplify the labelling and placarding requirements. issue 	<p>Option 1: Yes Option 2: Partial Option 3: Partial</p>	<p>Option 1: Yes Option 2: Partial Option 3: Partial</p> <p>No issue with Option 1</p>	
2.2 Display of Dangerous Goods Markings for Oxidizing Gases	<ul style="list-style-type: none"> • Canadian shipments containing UN1072, UN1073, UN3156, or UN3157 must currently display the oxidizing gas label/placard <ul style="list-style-type: none"> ○ Option 1 allows either the display of the current oxidizing gas label/placard OR the US oxygen label/placard ○ Option 2 allows either the display of 1) the Divisions 2.2 & 5.1 labels/placards (UN), 2) the oxidizing gas label/placard (TDGR), or 3) the “oxygen” labels/placards (49 CFR) ○ Option 3. “Status Quo”: Display the oxidizing gas label and placard instead of the Class 2.2 and Class 5.1 labels and placards. 	<p>Option 1: No Option 2: Yes Option 3: No</p>	<p>Option 1: Yes Option 2: Yes Option 3: No</p> <p>No issue with either options 1 or 2, but those options may still cause problems for int’l shipments</p> <p>O2 label would be “wrong” for UN3156 & UN3157 though</p>	N/A

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Proposal 3 – Alignment with the United States Hazardous Materials Regulations		Alignment with UN Model Regs	Alignment with 49 CFR	Alignment with other regulations
3.1 Reciprocity for Transportation by Road and Rail	3.1.1 Transportation between Canada and the US <ul style="list-style-type: none"> • 9.1(1) & (3) and 10.1(1) & (3) of TDGR would allow shipments “<u>from a place in Canada to a place in the United States</u>, in accordance with the classification, marking, labelling, placarding and documentation requirements of 49 CFR, if” • Methanol and anhydrous ammonia could thus be shipped as classified in the US (unless otherwise specified), unless paragraph (2) applied • Would not be allowed for shipments within Canada 	N/A	Yes Issue with 2 nd bullet	N/A
	3.1.2 Reshipping within Canada <ul style="list-style-type: none"> • Proposal to allow US placards to continue to be displayed on large moc when dangerous goods are reshipped in Canada by road or rail 	N/A	Yes No issue	N/A
3.2 Punctuation Marks and Capitalization	<ul style="list-style-type: none"> • Proposal to introduce a provision to allow the use or absence of punctuation marks within text required by the regulations, as well as the use of either upper case or lower case letters 	N/A	Yes No issue	N/A

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Proposal 3 – Alignment with the United States Hazardous Materials Regulations		Alignment with UN Model Regs	Alignment with 49 CFR	Alignment with other regulations
3.3 Exemptions	<p>3.3.1 Water Pump System Tanks</p> <ul style="list-style-type: none"> Proposal to introducing an exemption for pressurized tanks used in water pump systems tanks be filled to 276 KPa with UN1002, AIR, COMPRESSED, UN1066, NITROGEN, COMPRESSED, and UN1046, HELIUM, COMPRESSED (all Division 2.2) to be transported to installation sites without having to meet the marking and specification packaging requirements 49 CFR conditions include: <ul style="list-style-type: none"> the tank being made of steel with heads welded concave to pressure, pneumatic testing to 100 psig with the test pressure marked on the tank, maximum wall stress requirements, burst pressure at least 6 times the charge pressure, and a requirement that the tank be packed in strong outer packaging for transport TDGR conditions would be same, and would add a requirement to perform leak tests for helium TDGR exemption would also include “composite water pump system tanks and tanks with a diameter as large as 26 inches (instead of the 24 inch limit in the US exemption), with a burst pressure condition of 15 times the charge pressure for composite tanks 	N/A	Partial No issue, TDGR exemption would also allow UN1046, which 49 CFR doesn't cover and composite tanks	N/A
	<p>3.3.2 Small Quantities for Highway</p> <ul style="list-style-type: none"> TC is currently analysing the exemption for <i>Small Quantities for Highway and Rail</i> of 49 CFR but requires input from industry to gain a better understanding of the current needs in Canada and evaluate the impacts before it considers its adoption: <ul style="list-style-type: none"> Do you find that the exemptions under limited quantities or excepted quantities are too restrictive? How would you benefit from the “<i>Small Quantities Exemption</i>”? Would you have any safety concerns if the “<i>Small Quantities Exemption</i>” were adopted? 	N/A	Partial TC is requesting comments	N/A

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Proposal 3 – Alignment with the United States Hazardous Materials Regulations		Alignment with UN Model Regs	Alignment with 49 CFR	Alignment with other regulations
3.4 Odourization of Liquefied Petroleum Gases	3.4.1 Requirements to Odourize Liquefied Petroleum Gases <ul style="list-style-type: none"> Proposal to align with 49 CFR by addition of new special provision requiring odourization of LPG and other gases transported under UN1075, LIQUEFIED PETROLEUM GASES (new SP to would require that LPG used as fuel be odourized in accordance with CAN/CGSB-3.14, <i>Propane for fuel purposes</i>, and would set out minimal concentration of ethyl mercaptan to be added and procedures to ensure that enough odourant will remain in the means of containment during the course of transportation for other LPG used as fuel 	N/A	Yes No issue	N/A
	3.4.2 Requirements to Mark a Means of Containment Containing Non-odourized LPG <ul style="list-style-type: none"> Proposal to align with 49 CFR by addition of new section in Part 4 requiring that a cylinder, portable tank, highway tank or tank car containing non-odorized LPG be marked with the words “NON-ODOURIZED”, “NOT ODOURIZED”, “NON-ODORIZED”, “NOT ODORIZED” or “SANS ODORISANT” Proposal would allow these words to be displayed on a means of containment that is used for both odourized and non-odourized LPG 	N/A	Yes No issue, section title should be: “Unodourized Liquefied Petroleum Gases”	N/A

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Proposal 4 – Proposal to Modernize Part 4 (Dangerous Goods Safety Marks)		Alignment with UN Model Regs	Alignment with 49 CFR	Alignment with other regulations
4.1 Toxic Substances of Class 2.3 and Class 6.1	<ul style="list-style-type: none"> • Three proposals to revise the labelling and placarding requirements for Toxic Substances of Division 2.3 and Class 6.1: <ul style="list-style-type: none"> ○ Option 1 aligns with both the UN Model Regs & 49 CFR, by allowing both the white label/placard with skull and crossbones (with words inhalation hazard) AND the white with a black diamond for TIH substances ○ Option 2 only allows the white label/placard with a black diamond for TIH substances ○ Option 3 maintains the status quo 	<p>Option 1: Yes</p> <p>Option 2: No</p> <p>Option 3: Partial</p> <p>If option 2, TC should submit joint proposal to UNSCETDG to for adoption of black diamond for TIH</p>	<p>Option 1: Yes</p> <p>Option 2: Yes</p> <p>Option 3: Partial</p> <p>Options 1 or 2... but option 1 may still cause problems for int'l shipments</p>	N/A
4.2 Labels and Placards on an Empty Means of Containment	<ul style="list-style-type: none"> • Under TDGR, display of hazard class labels on empty moc not permitted, while 49 CFR allows labels to be displayed on empty packagings provided they are covered or moc are transported inside a closed vehicle • Two proposals <ul style="list-style-type: none"> ○ Option 1 aligns with 49 CFR by allowing label on empty moc ○ Option 2 maintains the status quo 	N/A	<p>Option 1: Yes</p> <p>Option 2: No</p> <p>No issue with Option 1</p>	N/A