



**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****Fortieth session**

Geneva, 28 November – 7 December 2011

Item 2 of the provisional agenda

Listing, classification and packing: miscellaneous**Special Provision 135: Classification of dichloroisocyanuric
acid salts****Transmitted by the Dangerous Goods Advisory Council (DGAC)¹****Introduction**

1. Special Provision 135 attaches to the Division 5.1 entry UN 2465 (DICHLOROISOCYANURIC ACID, DRY or DICHLOROISOCYANURIC ACID SALTS), and states: “The dihydrated sodium salt of dichloroisocyanuric acid is not subject to these Model Regulations.” Research indicates that this special provision was added to UN 2465 by the then UN Committee on the Transport of Dangerous Goods at its Eleventh Session in 1980 – if not at its prior session in 1978. Thus, the substance of the current text of Special Provision 135 pre-dates the incorporation into the Model Regulations of criteria for classification of environmentally hazardous substances – which first appeared in the Thirteenth Revised Edition of the Model Regulations (published in 2003).

2. It has recently been determined that some formulations of the dihydrated sodium salt of dichloroisocyanuric acid, commonly called sodium dichloroisocyanurate dihydrate or dichloro-s-triazinetriene dihydrate, meet the criteria for classification as an environmentally hazardous substance. However, the current wording of Special Provision 135 has given rise to confusion and varying interpretation in that it states unequivocally that the dihydrated sodium salt of dichloroisocyanuric acid is not subject to the requirements of the Model Regulations – notwithstanding whether the formulation may meet the criteria for

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

classification in Class 9 as an environmentally hazardous substance. It is not considered that it is the intent of the Sub-Committee to declare formulations of sodium dichloroisocyanurate dihydrate that meet the criteria for classification in Class 9 as an environmentally hazardous substance to be not subject to the Model Regulations as such. Rather, the history of Special Provision 135 suggests that the special provision was intended only to declare sodium dichloroisocyanurate dihydrate as not subject to the Model Regulations as a substance of Division 5.1. DGAC believes the special provision should be clarified to convey that a formulation meeting the criteria for classification in Class 9 as an environmentally hazardous substance is subject to the Model Regulations.

Proposal

3. In light of the foregoing, it is proposed to amend Special Provision 135 to read as follows:

“135 The dihydrated sodium salt of dichloroisocyanuric acid is not subject to these Model Regulations as a substance of Division 5.1.”
