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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 (Twenty-first session, 1-10 July 2002, agenda item 6(b))

PACKAGINGS

Amendment to Packing Instruction P601

Transmitted by the expert from the United States of America

Background

1. Paragraph (3) in P601 authorizes "Combination packagings" consisting of a drum within a drum, and in the AOuter packaging@provision specifically states that the "drum-in-drum" package must be tested in accordance with the requirements in 6.1.5 Aas a combination packaging assembled in the configuration in which it would be offered for transport. The expert from the United States considers that the requirement to test and mark the inner drum as a UN packaging, and then place that drum in another drum and test and mark the assembly as a UN combination packaging is unnecessary. It is considered that the intended level of safety would be achieved if the inner UN drum were allowed to be packed within an outer UN drum that has been tested at a mass corresponding to the mass of the assembled drum-in-drum package either as a packaging intended to contain inner packagings, or as a single packaging intended to contain solids or liquids, and marked accordingly. On this basis, it would not be necessary to test the drum in drum packaging in the configuration as offered for transport.

Proposal

3. In light of the foregoing, it is proposed that paragraph (3) in packing instruction P601 be amended by replacing the words ACombination packagings: with the words APackagings consisting of: and revising the text following the words AOuter packagings: to read:

APlastic or steel drums, removable head (1A2 or 1H2), tested in accordance with the test requirements in 6.1.5 at a mass corresponding to the mass of the assembled package either as a packaging intended to contain inner packagings, or as a single packaging intended to contain solids or liquids, and marked accordingly.