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SPECIAL PACKING PROVISION PP6

Transmitted by the Government of Belgium*

Summary: During the restructuring of RID/ADR, special packing provision PP6 was introduced for UN Nos. 1851, 3248 and 3249, packing groups II and III. This special provision restricts the permitted quantity per package to 5 litres/5 kg. For packing group III, other packing instructions (R01, LP01 and LP02) permit large quantities. Special provision PP6 in the IMDG Code is different and less restrictive. For packing group III, special provision PP6 should be deleted. For packing group II, the difference between the IMDG Code and RID/ADR should be eliminated.

* Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2003/59.

Introduction

For substances of UN No. 1851 (medicine, liquid, toxic, n.o.s.), 3248 (medicine, liquid, flammable, toxic, n.o.s.) and 3249 (medicine, solid, toxic, n.o.s.), packing instruction P001 (or P002) is amended by special provision PP6 in such a way that the “net mass per package” is restricted to 5 litres/5 kg.

For medicines of packing group III, packing instruction R01 permits 40 litres/50 kg per light gauge metal packaging and packing instructions LP01/LP02 permit up to 40 litres/50 kg per inner packaging (for UN Nos. 1851 and 3249, packing group III).

UN No.	Name and description	Class	Classification code	PG	Packing instructions	Special packing provisions
1851	MEDICINE, LIQUID, TOXIC, N.O.S.	6.1	T1	II	P001	PP6
1851	MEDICINE, LIQUID, TOXIC, N.O.S.	6.1	T1	III	P001 LP01 R001	PP6
3248	MEDICINE, LIQUID, FLAMMABLE, TOXIC, N.O.S.	3	FT1	II	P001	PP6
3248	MEDICINE, LIQUID, FLAMMABLE, TOXIC, N.O.S.	3	FT1	III	P001 R001	PP6
3249	MEDICINE, SOLID, TOXIC, N.O.S.	6.1	T2	II	P002	PP6
3249	MEDICINE, SOLID, TOXIC, N.O.S.	6.1	T2	III	P001 LP02 R001	PP6

This difference between special provision PP6 and packing instructions R01, LP01 and LP02 is difficult to explain.

The IMDG Code also uses special provision PP6, but it is worded differently and specifies that “the net mass per inner packaging of combination packagings” must not exceed 5 litres.

Proposal

- For UN Nos. 1851, 3248 and 3249 of packing group II:

Bring the text of RID/ADR for PP6 into line with the IMDG Code text, which is less restrictive.

- For UN Nos. 1851, 3248 and 3249 of packing group III:

Delete special packing provision PP6.

Justification

For UN Nos. 1851, 3248 and 3249 of packing group III, special provision PP6 contradicts packing instruction R01. In addition, for UN Nos. 1851 and 3248 of packing group III, special provision PP6 contradicts packing instructions LP01 and LP02.

Only these three substances are subject to PP6. UN No. 2810 (toxic liquid, organic, n.o.s.), for example, under the same classification code as UN No. 1851, is not subject to this quantitative restriction.

This restriction of net mass per package to 5 litres/5 kg in the case of UN Nos. 1851, 3248 and 3249 did not exist in RID before restructuring (1999 edition). There was no specific special packing requirement for these substances.

Feasibility

No problem.

This contradiction in the regulations has been pointed out by industry.
