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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-sixth session Geneva, 29 November-7 December 2004 Item 3 (c) of the agenda

OUTSTANDING ISSUES OR PROPOSALS OF AMENDMENTS TO THE RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Miscellaneous proposals

Packing instructions P601 and P602

Comments on ST/SG/AC.10/C.3/2004/82

Transmitted by the Experts from Germany and the United States of America (USA)

1. The authors of this paper have identified an unintended consequence of the proposal in ST/SG/AC.10/C.3/2004/82. The proposal unintentionally changed the existing requirements in P601 and 602 applicable to the integrity of the closures on inner packagings. Currently these closures are required to be securely held in place while in transportation.

Proposal

2. The following text is proposed:

P 601(1) Combination packagings with a maximum gross mass of 15 kg consisting of one or more glass inner packagings with a maximum quantity of 1 litre each and filled to not more than 90% of their capacity, individually packed in metal receptacles together with inert absorbent sufficient to absorb the entire contents of the glass inner packaging and cushioning material packed in 1A2, 1B2, 1N2, 1H2, 1D, 1G, 4A, 4B, 4C1, 4D, 4F, 4G or 4H2 outer packagings. The metal packagings together with the absorbing and cushioning material shall be capable of absorbent the entire liquid contents, to prevent hard shocks to the glass inner packaging and the loosening of the closures by impact or vibration during transport. The closures of each inner packaging shall be physically held in place by any means capable of preventing back-off or loosening of the closure by impact or vibration during transport and provided with a cap seal."

P 602 (1) Combination packagings with a maximum gross mass of 50 kg consisting of one or more glass inner packagings with a maximum quantity of 1 litre each and filled to not more than 90% of their capacity, individually packed in metal receptacles together with inert absorbent sufficient to absorb the entire contents of the glass inner packaging and cushioning material packed in 1A2, 1B2, 1N2, 1H2, 1D, 1G, 4A, 4B, 4C1, 4D, 4F, 4G or 4H2 outer packagings. The metal packagings together with the absorbing and cushioning material shall be capable of absorbent the entire liquid contents, to prevent hard shocks to the glass inner packaging and the loosening of the closures by impact or vibration during transport. The closures of each inner packaging shall be physically held in place by any means capable of preventing back-off or loosening of the closure by impact or vibration during transport and provided with a cap seal."