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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 new text is proposed:

P601 (1) Combination packagings consisting of glass inner packagings not exceeding 1 litre in capacity placed in metal receptacles together with cushioning and absorbent material sufficient to absorb the entire contents of the glass inner packaging. Metal receptacles must be further packed in 1A2, 1B2, 1N2, 1H2, 1D, 1G 4A, 4B, 4C1, 4C2, 4D, 4F, 4G or 4H2 outer packagings. The completed package must not exceed a gross mass of 15 kg. Inner packagings shall not be filled to more than 90% of their capacity. The closure 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.

P601 (2) Combination packagings consisting of glass inner packagings not exceeding 1 litre in capacity placed in metal receptacles together with cushioning and absorbent material sufficient to absorb the entire contents of the glass inner packaging. Metal receptacles must be further packed in 1A2, 1B2, 1N2, 1H2, 1D, 1G 4A, 4B, 4C1, 4C2, 4D, 4F, 4G or 4H2 outer packagings. The completed package must not exceed a gross mass of 50 kg. Inner packagings shall not be filled to more than 90% of their capacity. The closure 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.