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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

Thirty-first session  
Geneva, 2-6 July 2007  
Item 3 of the provisional agenda

**LISTING, CLASSIFICATION AND PACKING**

Allocation of substances and articles to Packing Instruction P099

Transmitted by the International Air Transport Association (IATA)

**Background**

1. At the thirtieth session of the Sub-Committee IATA submitted informal document INF.38 that identified substances and articles assigned to P099 in the fourteenth revised edition of the UN Model Regulations with the packing instructions assigned to those UN numbers in ADR, the ICAO Technical Instructions and IMDG Code.
2. The paper identified inconsistency in the assignment of packing instructions for some substances. For example a number of substances and articles are permitted for transport by road and/or air in packagings other than those specifically approved by a competent authority as would be required by P099, e.g. UN 1222 – Isopropyl nitrate, UN 3095 – Corrosive solid, self-heating, n.o.s., etc.
3. A relaxation for the packaging requirement for some modes of transport creates a potential for multi-modal disharmony. In general terms, the provisions contained within the UN Model Regulations should be taken as a minimum standard. So while some modes, or States, may impose additional restrictions or requirements, the modal or State regulations should not provide for a lesser standard than that contained in the Model Regulations.

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**Proposal**

4. Based on a review of the provisions of ADR, the United States Code of Federal Regulations Title 49 (49 CFR) and the ICAO Technical Instructions, it is proposed that a number of substances currently assigned Packing Instruction P099 be amended as follows:

Group A

5. These are substances to which ADR has assigned a generic packing instruction, P001 or P002 without any additional special provisions. It is proposed that the Model Regulations be similarly revised

UN No.	Name and description	Class or division	Subsidiary risk	UN packing group	Special provisions			Packagings and IBCs		Portable tanks and bulk containers	
						(7a)	(7b)	Packing Instruction	Special packing provisions	Instructions	Special provisions
(1)	(2)	(3)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9)	(10)	(11)
1194	ETHYL NITRITE SOLUTION	3	6.1	I		0	E0	<del>P099</del> P001			
1222	ISOPROPYL NITRATE	3		II	26	1 L	E2	<del>P099</del> P001 IBC02	B7		
1261	NITROMETHANE	3		II	26	1 L	E0	<del>P099</del> P001			
1865	n-PROPYL NITRATE	3		II	26	1 L	E2	<del>P099</del> P001 IBC02	B7		
3094	CORROSIVE LIQUID, WATER-REACTIVE, N.O.S.	8	4.3	I	274	0	E0	<del>P099</del> P001			
3095	<i>CORROSIVE SOLID, SELF-HEATING, N.O.S.</i>	8	4.2	I	274	0	E0	<del>P099</del> P002		T6	TP9 TP33
3096	CORROSIVE SOLID, WATER-REACTIVE, N.O.S.	8	4.3	I	274	0	E0	<del>P099</del> P002		T6	TP9 TP33
3124	TOXIC SOLID, SELF-HEATING, N.O.S.	6.1	4.2	I	274	0	E0	<del>P099</del> P002		T6	TP9 TP33
3301	CORROSIVE LIQUID, SELF-HEATING, N.O.S.	8	4.2	I	274	0	E0	<del>P099</del> P001			

Group B

6. These are substances to which ADR, ICAO and/or US DOT in 49 CFR has assigned a specific packing instruction. It is proposed that the applicable packing instruction be assigned to the substance as shown:

UN No.	Name and description	Class or division	Subsidiary risk	UN packing group	Special provisions			Packagings and IBCs		Portable tanks and bulk containers	
						(7a)	(7b)	Packing Instruction	Special packing provisions	Instructions	Special provisions
(1)	(2)	(3)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9)	(10)	(11)
3123	TOXIC LIQUID, WATER-REACTIVE, N.O.S.	6.1	4.3	I	274	0	E0	<del>P099</del> P601			
3125	TOXIC SOLID, WATER-REACTIVE, N.O.S.	6.1	4.3	I	274	0	E0	<del>P099</del> P002	T6	TP9 TP33	T6

### Group C

7. This group is a little more problematic. These are substances where ADR and in some cases the IMDG Code has gone beyond P099 and identified that the substance is forbidden for transport (see below). The question raised here is, should the UN Sub-Committee consider adopting a provision that goes beyond P099 to perhaps include, for some substances, recommendation that their transport requires a multilateral approval for international transport.

8. This was an issue that was raised by the expert from Italy in INF.11 at the twenty-eighth session of the Sub-Committee. The report of the twenty-eighth session identifies that the Sub-Committee "...agreed that a rationalized approach should be adopted in future in the Model Regulations for this purpose."

9. The Sub-Committee is invited to consider the development of such a rationalised approach.

UN Number	Proper Shipping Name	Class /Div	Sub Risk	PG	ADR	ICAO TI	IMDG Code
2186	HYDROGEN CHLORIDE REFRIGERATED LIQUID	2.3	8		Forbidden	Forbidden Forbidden	Forbidden
2249	DICHLORODIMETHYL ETHER STABILIZED	6.1	3	I	Forbidden	Forbidden Forbidden	P099
3097	FLAMMABLE SOLID, OXIDIZING, N.O.S.	4.1	5.1	II/III	Forbidden	Forbidden Forbidden	P099
3100	OXIDIZING SOLID, SELF-HEATING, N.O.S.	5.1	4.2	I/II	Forbidden	Forbidden Forbidden	P099
3121	OXIDIZING SOLID, WATER-REACTIVE, N.O.S.	5.1	4.3	I/II	Forbidden	Forbidden Forbidden	P099
3127	SELF-HEATING SOLID, OXIDIZING, N.O.S.	4.2	5.1	II/III	Forbidden	Forbidden (A2) Forbidden (A2)	P099
3133	WATER-REACTIVE SOLID, OXIDIZING, N.O.S.	4.3	5.1	II/III	Forbidden	Forbidden (A2) Forbidden (A2)	P099
3137	OXIDIZING SOLID, FLAMMABLE, N.O.S.	5.1	4.1	I	Forbidden	Forbidden Forbidden	P099
3255	tert-BUTYL HYPOCHLORITE	4.2	8	I	Forbidden	Forbidden Forbidden	P099