



**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****Forty-first session**

Geneva, 25 June – 4 July 2012

Item 3 (a) of the provisional agenda

Listing, classification and packing:**proposals of amendments to the list of dangerous goods of Chapter 3.2****Assignment of packing groups to articles****Transmitted by the International Air Transport Association (IATA)¹****Introduction**

1. Paragraph 2.0.1.3 identifies that packing groups are assigned to substances, other than those of Classes 1, 2 and 7, Divisions 5.2 and 6.2 and self-reactive substances of Division 4.1. The absence of any reference to assignment of packing groups to articles for Classes 3, 4, 8 and 9 and Division 5.1 suggests that articles are not assigned packing groups.

2. A review of the dangerous goods list supports that position for articles in Classes 3 and 8; fuel cell cartridges (UN nos. 3473 and 3477) and batteries (UN nos. 2794, 2795, 2800 and 3028) are all listed with no packing group assigned.

3. For the other classes and divisions some articles have been assigned packing groups and others have not. In Division 4.3, fuel cell cartridges (UN 3473) do not have a packing group, but batteries containing sodium (UN 3292) has been assigned to Packing Group II. The only article in Division 5.1, chemical oxygen generator (UN 3356) has been assigned Packing Group II and Class 9 is similar to Divisions 4.3, with an inconsistent application. Only air bag inflators, air bag modules and seat-belt pretensioners (UN 3268) and lithium batteries (UN nos. 3090, 3091, 3480 and 3481) have all been assigned to packing groups.

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

4. The inconsistent application of packing groups to articles creates problems for dangerous goods trainers in explaining any rationale to students trying to understand the regulatory structure and it also creates problems for all parties in the supply chain in applying the regulatory requirements consistently.

5. The Sub-Committee is invited to consider if there is any value in the application of packing groups to articles, which must therefore appear on the dangerous goods transport document. It is recognised that the Sub-Committee may, for safety reasons, require a certain standard of packaging to be applied to articles, however in these instances this can be specified in the applicable packing instruction without any requirement for a packing group as part of the dangerous goods transport information.

6. If the view of the Sub-Committee is that there is no requirement to assign packing groups to articles it is proposed to revise the applicable entries in the dangerous goods list to remove reference to the packing group. At the same time the Sub-Committee may consider if there is a benefit in including a clear statement in 2.0.1.3 and potentially the Guiding Principles to the effect that articles in the applicable classes and divisions are not assigned a packing group. Some indicative text is provided below.

Proposal

6 Revise the dangerous goods list as follows:

UN No.	Name and description	Class or division	Subsidiary risk	UN packing group	Special provisions	Packagings and IBCs			
						Limited and excepted quantities	Packing instruction	Special packing provisions	
(1)	(2)	(3)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9)
3090	LITHIUM METAL BATTERIES (including lithium alloy batteries)	9		II	188 230 310	0	E0	P903	
3091	LITHIUM METAL BATTERIES CONTAINED IN EQUIPMENT or LITHIUM METAL BATTERIES PACKED WITH EQUIPMENT (including lithium alloy batteries)	9		II	188 230 360	0	E0	P903	
3268	AIR BAG INFLATORS, or AIR BAG MODULES, or SEAT-BELT PRETENSIONERS †	9		III	280 289	0	E0	P902 LP902	

UN No.	Name and description	Class or division	Subsidiary risk	UN packing group	Special provisions	Packagings and IBCs		
						Limited and excepted quantities	Packing instruction	Special packing provisions
3292	BATTERIES, CONTAINING SODIUM, or CELLS CONTAINING SODIUM	4.3		II	239	0 E0	P408	
3356	OXYGEN GENERATOR, CHEMICAL †	5.1		II	284	0 E0	P500	
3480	LITHIUM ION BATTERIES (including lithium ion polymer batteries)	9		II	188 230 310 348	0 E0	P903	
3481	LITHIUM ION BATTERIES CONTAINED IN EQUIPMENT or LITHIUM ION BATTERIES PACKED WITH EQUIPMENT (including lithium ion polymer batteries)	9		II	188 230 348 360	0 E0	P903	

7. Revise paragraph 2.0.1.3 as follows:

2.0.1.3 For packing purposes, substances other than those of Classes 1, 2 and 7, divisions 5.2 and 6.2 and other than self-reactive substances of Division 4.1 are assigned to three packing groups in accordance with the degree of danger they present:

Packing group I: Substances presenting high danger;

Packing group II: Substances presenting medium danger; and

Packing group III: Substances presenting low danger.

The packing group to which a substance is assigned is indicated in the Dangerous Goods List in Chapter 3.2.

Articles assigned to Classes 3, 4, 8 and 9 and Divisions 5.1 and 6.1 are not assigned packing groups. For packing purposes any requirement for a specific packaging performance level is set out in the packing instruction applicable.