



**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-second session**

Geneva, 3–11 December 2012

Item 2(a) of the provisional agenda

**Recommendations made by the Sub-Committee at its
thirty-ninth, fortieth and forty-first sessions and
pending issues: explosives and related matters****Changes to Packing Instructions P116, P131 and P137****Transmitted by the expert from Canada¹****Background**

1. At its forty-first session, the Sub-Committee, and the Working Group on Explosives, considered paper ST/SG/AC.10/C.3/2012/41, transmitted by Canada, in relation to packing instructions P116, P131 and P137. That paper proposed the addition of certain packaging types to each of the subject packing instructions. Those additional packaging types were considered to provide a level of safety consistent with the packaging types already authorized and were intended to reflect current needs in industry.
2. Although the Working Group on Explosives recommended adoption of the Canadian proposals (Informal document INF.67, paragraph 16) the Sub-Committee did not agree, as indicated in the report of the session (ST/SG/AC.10/C.3/82/ paragraph 30) “because the packagings authorized for specific substances are already indicated in particular packing requirements”.
3. Following the Sub-Committee’s decision and upon further consideration it was realized that Canada’s original proposal did require clarification. Nonetheless certain inconsistencies in the subject packing instructions still existed and in our view should still be addressed. Canada is therefore submitting this revised proposal.

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. Packing Instruction P116 should allow the use of sift proof woven plastics bags (5H2) and water resistant woven plastics bags(5H3), as outer packagings, for all substances where this packing instruction already authorizes other plastics bags as outer packagings. Currently P116 allows plastics woven bags without inner liner or coating (5H1) and unwoven plastics film bags (5H4) for all substances, while authorizing 5H2 and 5H3 bags only for select substances under PP65. For those cases where 5H1 and 5H4 bags are already authorized as outer packagings in P116, there appears to be no safety rationale for not also permitting the use of 5H2 or 5H3 bags. 5H2 and 5H3 bags are commonly made by adding a coating to, or laminating a plastic film to, woven plastic fabric therefore they could be considered as being of higher integrity than the 5H1 and 5H4 bag designs. If this proposal is adopted, existing PP65 should be deleted as a consequential change.

5. Packing Instructions P131 and P137 should allow the use of solid plastics boxes (4H2) in addition to the other box types already authorized as outer packagings. Currently these packing instructions allow plastics drums as outer packagings but do not allow plastics boxes. We believe that the use of plastics boxes as outer packagings under P131 and P137 would be as safe as or safer than the use of the materials of construction already permitted for boxes.

Proposals

6. For P116, under the column “outer packagings”, the first line of the entry for “bags” should read: “woven plastics (5H1, 5H2, 5H3)”. As a consequential change, delete PP65.

For P131 and P137, to the entries for “boxes” under the column “outer packagings” add: “plastics, solid (4H2)”.
