

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

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Item 5 (G) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: packagings

Use of the letter “W” in packaging codes

Submitted by the expert from France

Introduction

1. According to 6.1.2.4 of the UN Recommendations:
“The letters “T”, “V” or “W” may follow the packaging code. [...] The letter “W” signifies that the packaging, although of the same type indicated by the code, is manufactured to a specification different from that in 6.1.4 and is considered equivalent under the requirements of 6.1.1.2.»
2. Sub-section 6.1.1.2 states that “in order to take into account progress in science and technology, there is no objection to the use of packagings having specifications different from those in 6.1.4, provided that they are equally effective, acceptable to the competent authority and able successfully to withstand the tests described in 6.1.1.3 and 6.1.5.”
3. France considers that with the existing wording, it is acceptable to modify the construction and testing requirements of packagings of 6.1.4. Nevertheless this wording does not allow to deviate from the definition of a packaging type defined in 1.2.1.

Type of issue arising

4. For example we have recently encountered an issue concerning 24 plastic boxes, each one having its proper lid, assembled together on a base pallet, with a common lid, surrounded by a plastic film and two bracings. The manufacturer of this “packaging” asked to approve those 24 boxes as one single box with the code 4H2W “Solid plastics box”, arguing that he had received such a certificate of approval in the past from other countries.



5. According to 1.2.1 a box is defined as follows:
“*Box*” means a packaging with **complete rectangular or polygonal faces**, made of metal, wood, plywood, reconstituted wood, fibreboard, plastics or other suitable material. Small holes for purposes of ease of handling or opening or to meet classification requirements, are permitted as long as they do not compromise the integrity of the packaging during carriage;”.
6. To our understanding in France, those 24 boxes put together on a pallet under a lid cannot be considered as a single solid plastics box, even with the plastics film and the bracings, because this design type would be in contradiction to the definition of a box in 1.2.1 reproduced hereabove. Therefore we recommend that each box should be considered with its own lid as a rigid plastic box (code 4H2), whereas the pallet, the plastic film and the bracings should be considered as an overpack.
7. Apparently this interpretation is not shared amongst all countries, since certificates have already been delivered in the past by other countries for this group of 24 boxes, approving it as one single rigid plastics box with the code 4H2W. The industry also states a box on its own cannot withstand the tests to be approved individually.
8. This question was raised at the Autumn 2013 session of the RID/ADR/ADN Joint Meeting in document INF. 12 from France. The Joint Meeting has decided to prompt a discussion at the UN Sub-Committee in order to settle the problem at multimodal level (document ECE/TRANS/WP.15/AC.1/132):
“57. Several delegations considered that it was inappropriate to use the code “W” for new kinds of packagings for which there were no provisions or definitions in the regulations. It was understandable that the industry would develop new kinds of packagings to meet logistical needs, but they should then be submitted to the United

Nations Committee of Experts so that they could be accepted for the transport of dangerous goods.

58. At the request of the Joint Meeting, it was agreed that the representative of France would submit such questions of interpretation in an informal document to the United Nations Sub-Committee of Experts at its next session, so as to prompt a discussion and settle the problem at the multimodal level.”.

Interpretation of the UN Sub-Committee

9. This kind of issue is quite common and will continue to arise frequently, as those packagings are often used in the automobile sector.
