Use of the letter “W” in packaging codes – additional information for INF.12 submitted by the Government of France

Transmitted by the Government of Belgium

**Summary**

**Executive summary:** This paper provides additional information to complement INF.12 regarding the use of the letter “W” in packaging codes.

**Action to be taken:** Discuss together with INF.12.

**Related documents:** INF.12 (September 2013 session of the RID/ADR/ADN Joint Meeting).

**Background**

1. INF.12 describes a type of packaging, typically for the automotive industry which has an automated logistics and production workflow, consisting of multiple individual compartments put together to create a larger assembly. This is current practice in different countries, such as Belgium and Sweden and is illustrated in the pictures below. Contrary to what is stated in INF.12, however, these individual compartments do not have their own lids or closures but the contents are retained by stacking other individual components on top of these compartments, which are in turn mounted on a specific pallet. For the upper compartments, a large lid is put in place and fastened, creating a packaging unit.
2. As these individual compartments do not possess individual closures, these cannot be approved or shipped as individually tested UN packagings. The assembled unit is instead regarded as a box with different compartments and the unit is tested according to all
relevant “normal” UN testing requirements and (upon successful completion of the test regime) approved as 4H2W packaging for dangerous goods (e.g. air-bags for an automotive assembly line).

3. Finally, as these packagings are shipped in a wider multimodal context, including maritime transport, and the UN packaging approval requirements under RID/ADR/ADN 6.1.2.4 originate directly from the UN Model Regulations, the most appropriate forum for a discussion on this topic would be the UN Subcommittee of Experts on the Transport of Dangerous Goods.