

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

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Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 6 (a) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: dangerous goods in machinery, apparatus or articles, N.O.S.**

Dangerous goods in machinery, apparatus or articles, N.O.S – Packing Instruction

Transmitted by the expert from the United Kingdom

Introduction

1. The expert from the United Kingdom has submitted document ST/SG/AC.10/C.3/2015/33 which presents proposals for the adoption of provisions to transport various articles containing dangerous substances as an integral element of the article, which for practical reasons, cannot be removed from the article for the purposes of transport. This document advises that a packing instruction will follow in a separate paper for consideration by the Sub-Committee. A draft packing instruction was included in an earlier version of ST/SG/AC.10/C.3/2015/33 and this was circulated to sub-committee members. A number of comments were received, and as a result the proposed packing instruction was removed from ST/SG/AC.10/C.3/2015/33 before official submission. This paper contains a proposed packing group solution that addresses these comments.

2. In formulating this packing instruction, the expert from the United Kingdom was particularly aware of the underlying principles of the UN to provide an appropriate level of safety and not to create an impediment to the movement of these goods. Given that smaller articles are more likely to be mass produced, it was felt that UN approved packaging would be appropriate, particularly as there are already V marked packaging that could accommodate low numbers. However, larger items with small numbers being produced with only relatively small amounts of dangerous goods would be disproportionately affected by UN packaging and to avoid repeated applications to the Competent Authority a special packing provision is included. Since there is the probability that some articles will exceed the packaging limits, a large packaging instruction is also included with the equivalent special large packaging provision is included.

Proposal

3. Insert the following new packing instruction into 4.1.4.1 as follows:

P00X	PACKING INSTRUCTION	P00X
This instruction applies to UN Nos.: 35AA, 35BB, 35CC, 35DD, 35EE, 35FF, 35GG, 35HH, 35II, 35JJ and 35KK		
The following packagings are authorised provided the general provisions of 4.1.1 and 4.1.3 are met:		
Drums (1A2, 1B2, 1D, 1G, 1H2, 1N2); Jerricans (3A2, 3B2, 3H2) Boxes (4A, 4B, 4C1, 4C2, 4D, 4F, 4G, 4H1, 4H2, 4N);		
Packagings shall conform to the packing group II performance level		
Special Packing provision		
PPxx Large and robust articles individually over 100 kg mass [or where the package volume for an individual article exceeds 450 litres] and containing not more than 5% by mass or volume of dangerous substances may be secured on pallets, fixed to cradles, contained in crates or secured in other suitable handling devices without application of 4.1.1.3		

4. Insert the following new large packing instruction into 4.1.4.1 as follows:

LP0X	PACKING INSTRUCTION	LP00X
This instruction applies to UN Nos.: 35AA, 35BB, 35CC, 35DD, 35EE, 35FF, 35GG, 35HH, 35II, 35JJ and 35KK		
The following large packagings are authorised provided the general provisions of 4.1.1 and 4.1.3 are met:		
Metal (50A, 50B, 50N.); Plastics (50H); Wood (50C, 50D, 50F); Fibreboard (50G). Packagings shall conform to the packing group II performance level		
Special Packing provision		
LXX Large and robust articles containing not more than 5% by mass or volume of dangerous substances may be secured on pallets, fixed to cradles, contained in crates or secured in other suitable handling devices without application of 4.1.1.3		

Consequential amendments in 3.2.1 Table A Column 8 against 35AA, 35BB, 35CC, 35DD, 35EE, 35FF, 35GG, 35HH, [35II], 35JJ and 35KK add P00X and LP00X and in Column 9 add PPXX and LXX