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**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-ninth session**

Geneva, 27 June – 6 July 2016

Item 3 of the provisional agenda

**Listing, classification and packing****Revision of packing instruction LP902 in the Model  
Regulations****Transmitted by the expert from Canada<sup>1</sup>****Objective**

1. To modify packing instruction LP902 to eliminate inconsistencies between the two authorized packing instructions (P902 and LP902) for SAFETY DEVICES, electrically initiated (UN3268).
2. Reference is made to document ST/SG/AC.10/C.3/2010/26.

**Introduction**

3. The expert from Canada recommends modifying packing instruction LP902 to introduce a list of codes of rigid large packagings (LP). This modification is recommended to avoid an interpretation that does not meet the objective of the packing instruction and to harmonize this instruction with other large packaging (LP) instructions.

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2015–2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15).

## Context

4. During the thirty-seventh session of the Sub-Committee, the experts of the United Kingdom and Sweden and the representative of the International Air Transport Association (IATA) submitted document ST/SG/AC.10/C.3/2010/26 to clarify certain packing instructions.

5. Following this session, packing instruction P902 was amended to clarify its objective. Prior to the amendment, the packing instruction simply stated that packagings had to meet the packing group III performance level. The authors of document ST/SG/AC.10/C.3/2010/26 had explained that this instruction could be interpreted to indicate that:

- (a) As long as a consignor's package can meet the performance level it does not need a UN packaging mark; and
- (b) A bag could be used as an outer packaging.

6. Since neither of these interpretations meets the objectives of packing instruction P902, the authors of document ST/SG/AC.10/C.3/2010/26 proposed to clarify the instruction. Packing instruction P902 was thus amended in the 17<sup>th</sup> revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations, as follows:

P902	PACKING INSTRUCTION	P902
This instruction applies to UN No. 3268.		
<b>Packaged articles:</b>		
The following packagings are authorized provided the general provisions of <b>4.1.1</b> and <b>4.1.3</b> are met:		
<u>Drums (1A2, 1B2, 1N2, 1H2, 1D et 1G);</u>		
<u>Box (4A, 4B, 4N, 4C1, 4C2, 4D, 4F, 4G, 4H1, 4H2);</u>		
<u>Jerricans (3A2, 3B2 et 3H2).</u>		
Packagings shall conform to the packing group III performance level.		
The packagings shall be designed and constructed so as to prevent movement of the articles and inadvertent operation during normal conditions of transport.		
<b>Unpackaged articles:</b>		
The articles may also be transported unpackaged in dedicated handling devices, vehicles or containers when moved from where they are manufactured to an assembly plant.		
<b>Additional requirement:</b>		
Any pressure receptacle shall be in accordance with the requirements of the competent authority for the substance(s) contained therein.		

7. However, no correlative changes were made to packing instruction LP902 following the change of packing instruction P902 in the seventeenth revised edition.

LP902	PACKING INSTRUCTION	LP902
This instruction applies to UN No. 3268.		
<p><b>Packaged articles:</b></p> <p>The following large packagings are authorized, provided that the general provisions of <b>4.1.1</b> and <b>4.1.3</b> are met: Packagings conforming to the packing group III performance level. The packagings shall be designed and constructed to prevent movement of the articles and inadvertent operation during normal conditions of transport.</p> <p><b>Unpackaged articles:</b></p> <p>The articles may also be transported unpackaged in dedicated handling devices, vehicles, containers or wagons when moved from where they are manufactured to an assembly plant.</p>		
<p><b>Additional requirement:</b></p> <p>Any pressure receptacle shall be in accordance with the requirements of the competent authority for the substance(s) contained therein.</p>		

8. Consequently, if one consults packing instruction LP902 without considering packing instruction P902, a flexible large packaging is authorized but does not meet, in the opinion of the expert from Canada, the objective of packing instruction LP902. We note that this is the only LP packing instruction, except LP621 packing instruction, that does not offer a list of codes of authorized large packagings.

9. Packing instruction P902 in the 19th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations clearly states that only rigid packagings bearing the UN mark are authorized.

## Proposal

10. The expert from Canada recommends making the same changes to the LP902 packing instruction in order to eliminate inconsistencies between the two authorized packing instructions (P902 and LP902) for UN 3268.

11. The LP902 packing instruction would read as follows:

LP902	PACKING INSTRUCTION	P902
This instruction applies to UN No. 3268.		
<p><b>Packaged articles:</b></p> <p>The following large packagings are authorized, provided that the general provisions of <b>4.1.1</b> and <b>4.1.3</b> are met:  <del>Packagings conforming to the packing group III performance level.</del> <u>Rigid large packagings conforming to the packing group III performance level, made of:</u></p> <ul style="list-style-type: none"> <li><u>steel (50A)</u></li> <li><u>aluminium (50B)</u></li> <li><u>metal other than steel or aluminium (50N)</u></li> <li><u>rigid plastics (50H)</u></li> <li><u>natural wood (50C)</u></li> <li><u>plywood (50D)</u></li> <li><u>reconstituted wood (50F)</u></li> <li><u>rigid fibreboard (50G)</u></li> </ul> <p>The packagings shall be designed and constructed to prevent movement of the articles and inadvertent operation during normal conditions of transport.</p> <p><b>Unpackaged articles:</b></p> <p>The articles may also be transported unpackaged in dedicated handling devices, vehicles, containers or wagons when moved from where they are manufactured to an assembly plant.</p>		
<p><b>Additional requirement:</b></p> <p>Any pressure receptacle shall be in accordance with the requirements of the competent authority for the substance(s) contained therein.</p>		