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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

**Fifty-first session**

Geneva, 3-7 July 2017  
Item 3 of the provisional agenda  
**Listing, classification and packing**

Clarification of special packing provisions PP13 and PP33

Transmitted by the expert from Germany[[1]](#footnote-2)

Introduction

1. The text of special packing provisions PP13 (see P002) and PP33 (see P001) in 4.1.4.1 is open to interpretation. The wording does not make clear whether single packagings are excluded or whether only the use of combination packagings is restricted to certain kinds.

Special packing provision PP13

2. "For articles classified under UN 2870, only combination packagings meeting the packing group I performance level are authorized."

3. In the opinion of the German expert, this special provision should be understood to mean that for UN 2870 only combination packagings are permitted, single packagings are prohibited. Combination packagings have to meet the packing group I performance level.

Special packing provision PP33

4. "For UN 1308, packing groups I and II, only combination packagings with a maximum gross mass of 75 kg are allowed."

5. In the opinion of the German expert, this special provision should be understood to mean that for UN 1308, packing groups I and II, only combination packagings are permitted, single packagings are prohibited. The gross mass of the combination packagings must not exceed 75 kg.

Proposal

6. To ensure a uniform interpretation of the special provisions, the wording should be amended to read as follows:

Special packing provision PP13

"For articles classified under UN No. 2870, single packagings are not authorized. Combination packagings shall meet the packing group I performance level."

Special packing provision PP33

"For UN No. 1308, packing groups I and II, single packagings are not authorized. The maximum gross mass of combination packagings shall not exceed 75 kg."

1. In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, para. 14). [↑](#footnote-ref-2)