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**COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS**

**(Twentieth session,
Geneva, 7-16 December 1998,
agenda item 2 (b))**

**WORK OF THE SUB-COMMITTEE OF EXPERTS ON
THE TRANSPORT OF DANGEROUS GOODS**

**Report of the informal Working Group on Packing Instructions
(Frankfurt, 7 - 11 September 1998)**

Annex 5

Packing instructions for large packagings

**Proposal transmitted to the informal Working Group by the Expert from Germany
(see para. 94 to 96 of the report)**

Introduction

During the fifteenth session of the UN Sub-Committee of Experts on the Transport of Dangerous Goods, Geneva, 29 June - 9 July 1998, agreement on some basic packing instructions was reached. Nevertheless the question of inclusion of large packagings in the packing instructions for combination packagings or in separate packing instructions was postponed.

Meanwhile the analogy of packing instructions for combination packagings and large packagings seems to be clear at first sight, there are some more considerations to be discussed before a decision should be taken.

Large packagings are envisaged to be used for articles, mostly those of class 1, as well as for inner packagings containing solids or liquids of various classes, especially classes 3, 6.1, 8 and 9. Furthermore, large packagings are suitable for the transport of collected packaged wastes.

Packing instructions for articles in large packagings

The current work within this biennium is mainly aiming at including packing instructions for substances of classes 3 to 5.1, 6.1, 8 and 9 into the Model Regulations. The packing methods for class 1 articles are not part of the work in this context.

Proposals 1 and 2:

1. The Working Group is invited to propose to the Committee to continue work on packing instructions in the next biennium with the view to include large packagings in the existing packing methods for class 1 articles as appropriate.
2. For articles of classes/divisions other than 1, 2, 6.2 and 7 inclusion of large packagings in a general packing instruction LPXX or in suitable special packing instructions in relevant classes (especially 8 and 9) should be checked.

Securing such articles in a large packaging is posing some problems, clear requirements would be necessary to ensure safe securing of the articles.

Proposal 3:

3. Include in a suitable paragraph of in chapter 4:

“If articles of classes or divisions 3, 4.1 to 6.1, 8 or 9 are packed in a large packaging, they should be so stowed and secured by means, that they cannot move significantly and that any damage of the large packaging is prohibited under normal conditions of transport. Articles should not be packed together in one large packaging with inner packagings containing liquids or solids.”

Restrictions for the use of large packagings for certain dangerous goods

Large packagings are a relatively new development of technology. Furthermore their size may be significantly higher than the size of normal combination packagings. So there are some vague parameters and insufficient experience with the use of such large packagings with a high number of inner packagings. To avoid unacceptable risks especially for very dangerous goods, some restrictions are necessary.

Proposals 4 to 10:

4. Inner packagings to be used in large packagings should not exceed the limits of inner packagings of combination packagings.

5. For packing inner packagings in combination packagings, general requirements for packing, stowing and securing inner packagings are already available. It should be checked whether such existing provisions would also be suitable for large packagings. It should clearly be ensured that suitable requirements serving the same purpose as those related to the packing of inner packagings in combination packagings are included in the Model Regulations for the packing of inner packagings in large packagings.
6. Large packagings should not be permitted for substances for which combination packagings are not allowed.
7. If special packing provisions are included to restrict the use of combination packagings for certain substances, the same restrictions should be applied to large packagings.
8. If contaminated inner packagings or packaging waste are to be collected and transported for recycling or disposal, additional requirements are necessary to avoid the spreading of residues. In chapter 4, a suitable paragraph should be added to read:

“If large packagings are used for collection and transport of contaminated inner packagings or packaging waste, the material of the large packaging shall be compatible with the residues or a compatible liner shall be fitted in the large packaging. Sufficient cushioning material should be added to fill up spaces and sufficient absorbing material should be added to absorb any free liquid”.
9. The use of large packagings should not be permitted for substances, for which specific packing instructions or special packing provisions are applicable, especially for substances listed in document ST/SG/AC.10/C.3/1998/50.
10. In analogy with the existing provisions for IBCs, large packagings should not be permitted for the transport of inner packagings containing Packing Group I liquids.

Method to include packing instructions for large packagings

If there may exist analogies between the use of large packagings for inner packagings and combination packagings, for their construction, testing and handling there are various analogies with IBCs. So it may not be appropriate to include provisions for large packagings either in packing instructions for combination packagings or in those for IBCs.

Furthermore, the proposed packing instructions P001 and P002 are already very detailed and complicated and do not seem very user-friendly. Extending them to also include large packagings and the various codes for different types would make P001 and P002 much more complicated and unsuitable for the users of the Model Regulations.

Proposal 11:

11. Packing instructions for large packagings should be separated from the packing instructions for packagings (P001, P002 to P9XX) and should be numbered LP01, LP02 to LP9X.
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