

# UN/CETDG/20/INF.24

## COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

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

### PACKING INSTRUCTIONS

Report of the Informal Working Group on Packing Instructions  
(ST/SG/AC10/1998/16)

Transmitted by the European Chemical Industry Council (CEFIC)

#### CEFIC COMMENTS AND PROPOSALS

The reading of the report of the last meeting of the informal working group on Packing Instructions (Frankfurt 7-11 September 1998) gives rise to the following comments and proposals from CEFIC:

##### Modal derogations

Paragraph 92 of the report illustrates the lack of consensus between the experts on the guiding principles needed for harmonising the basic packaging instructions included in the Model Regulation with the derogations contained in the various modal regulations.

The paragraph 5 in the introduction of the Orange Book related to the principles underlying the regulation of the transport of dangerous goods is in our opinion also not convenient.

CEFIC believes that the primary goals of having packing instructions in the Model Regulation is to harmonise as much as possible the different modal requirements, to reduce to a minimum the modal derogations and, by that way, to introduce world-wide simple, unique, standard packing requirements beneficial to the users.

The specificity of the conditions of transport in the different modes can however not be denied. Less or more stringent derogations should however only be introduced in the modal regulations if valid compelling safety needs can be demonstrated.

The modal experts have to be, in that respect, closely involved in the careful drafting of those important basic packing instructions and they should indicate and justify to the UNCETDG any proposition of derogation to be adopted in their respective modes.

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Packing instructions P601, P602 and P804

Those packing instructions bring a totally new concept of packaging requirements.

As an example P601 and P804 introduce the concept of double packaging with an inner drum and an outer one. Strong reservations have been expressed on the value of such a requirement, in particular by CEFIC, Germany and Belgium (see ST/SG/AC.10/1998/16 para. 77, 81, 84, 86, 88, 90). At the same time, no detailed justification has been presented and no in depth debate conducted for the adoption of such new concept.

The same comment applies to the quantity limitation for the drums and the combination packaging in those 3 proposed packing instructions.

CEFIC believes that such important decision can not be taken furtively without an in-depth debate on the value of the concept in term of safety.

In this order, CEFIC proposes to study carefully and attentively this specific matter during the next biennium, and to introduce temporarily in the packing instructions the P001 instruction instead of the P602, and change P601 and P804 into “as required by the modal regulations”.

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