

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

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Item 2 of the provisional agenda

EXPLOSIVES AND RELATED MATTERS

Outcome of the discussion of ST/SG/AC.10/C.3/2008/106

Note by the secretariat

After discussion with the expert from the United Kingdom, the secretariat proposes the following changes to 4.1.5.5 and 4.1.7.1.1, and would like to draw the attention of the Sub-Committee on the related NOTES 1 to 5 below:

Amend 4.1.5.5 to read:

“Unless otherwise specified in these Regulations, packagings, including IBCs and large packagings, shall conform to the requirements of chapters 6.1, 6.5 or 6.6, as appropriate, and shall meet their test requirements for packing group II.”

Amend 4.1.7.1.1 to read:

“Packagings for organic peroxides and self-reactive substances shall conform to the requirements of chapter 6.1 [or of chapter 6.6, as appropriate,] and shall meet its [their] test requirements for packing group II.”

NOTES:

1. 4.1.7.1 concerns packagings, to the exclusion of IBCs which are addressed in 4.1.7.2. Since the term “packaging” normally cover IBCs, the Sub-Committee may wish to amend this title to read “Use of packagings (except IBCs).”
2. Large packagings are not allowed so far for organic peroxides not self-reactive substances (No LP instruction indicated in the dangerous goods list). Therefore the Sub-Committee may wish to consider whether the current reference to Chapter 6.6 in 4.1.7.1.1 is appropriate.
3. IBCs are authorized for organic peroxides and self-reactive substances in certain cases, but there is no indication that they should meet the PG II testing requirements – The

Sub-Committee may wish to consider the possible addition of the following text at the end of 4.1.7.2.1.

“IBCs shall conform to the requirements of Chapter 6.5 and shall meet its test requirements for packing group II.”.

4. In packing instruction P520, in the first sentence of the second box starting with “the packagings listed below ...”, the words “and special provisions of 4.1.7 are met” should read “and special provisions of 4.1.7.1 are met.”.
5. In the above proposals for text, the words “to ensure a minimum standard” have been deleted from the original UK proposal in ST/SG/AC.10/C.3/2008/106 because they do not bring anything from the regulatory standpoint, and all provisions of the UN Model Regulations may be regarded as intended to ensure a minimum safety standard. This could be covered by a sentence in the Guiding Principles, explaining why these packagings/IBCs have to meet the PG II test performance level and why metal packagings meeting the PG I test performance level are now authorized although they were previously not allowed.
