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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****Thirty-seventh session**

Geneva, 21–30 June 2010

Item 3 of the provisional agenda

**Listing, classification and packing****Alternative outer packaging for Packing Instruction P802****Transmitted by the International Council of Chemical Associations  
(ICCA)<sup>1</sup>****Introduction**

1. Packing Instruction P802 is assigned to 3 entries:

UN 1790 HYDROFLUORIC ACID with more than 60% hydrogen fluoride,  
8,(6.1), I

UN 1836 THIONYL CHLORIDE, 8 (6.1), I

UN 2444 VANADIUM TETRACHLORIDE, 8, I

However it does not allow the use of fibreboard boxes (4G) and fibre drums (1G) as outer packagings with glass or plastics inner packagings as part of a combination packaging.

2. Since December 2004 fibreboard boxes (4G) have been regularly and successfully used for sea journeys of such products under a Competent Authority approval of an alternative packaging in accordance with chapter 7.9 of the International Maritime Dangerous Goods Code (IMDG Code). No problems have been observed in these 5 years.

3. Currently some 30 similar liquid corrosive substances of PG I such as UN 1786 HYDROFLUORIC ACID AND SULPHURIC ACID MIXTURE, 8, (6.1), I or UN 3093 CORROSIVE LIQUID, OXIDISING, N.O.S., 8 (5.1), I are assigned to Packing Instruction

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2009–2010 approved by the Committee at its fourth session (refer to ST/SG/AC.10/C.3/68, para. 118 (d) and ST/SG/AC.10/36, para. 14).

P001. They can therefore be packed in glass or plastics inner packagings with fibre drums and fibreboard boxes as outer packagings as part of a combination packaging.

4. Although the Competent Authority approval, mentioned under paragraph 2, covers only the use of fibreboard boxes (4G) as outer packaging, it can be assumed that the use of fibre drums (1G) offers an equivalent safe alternative. Additionally Packing Instruction P802 offers already this possibility (in indent (2)) for combination packagings with metal inner packagings.

## Proposal

5. ICCA therefore proposes amending P802, paragraph (1), (inserting 1G and 4G) as follows:

"(1) Combination packagings

Outer packagings: 1A2, 1B2, 1N2, 1H2, 1D, 1G, 4A, 4B, 4C1, 4C2, 4D, 4F, 4G or 4H2".

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