



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 3 of the provisional agenda

Listing, classification and packing

Amendments on special provisions 145 and 146

Transmitted by the expert from China*

Introduction

1. In accordance with the name and description shown in column (2) of the Dangerous Goods List, Packing Group (PG) II entry of UN No. 3065 is for “*ALCOHOLIC BEVERAGES, with more than 70 % alcohol by volume*”, while PG III entry is for “*ALCOHOLIC BEVERAGES, with more than 24 % but not more than 70 % alcohol by volume*”. However, the flash points of alcoholic beverages depend not only on their alcohol contents, but also on the varied contents of other components. The flash point of beverages with alcohol of slightly less than 70% may sometimes be below 23 °C, which means that they should be classified as PG II based on the criteria in 2.3.2.6 of the Model Regulations.

2. As a bulk commodity transported worldwide in large volumes, it is reasonable to determine the packing groups of alcoholic beverages based on the alcohol content to minimize the necessity for flash point tests. However, the current text “alcoholic beverages of packing group III/II” used in special provisions 145 and 146 assigned to the two entries respectively can cause confusion. For example, some relevant parties may believe that alcoholic beverages with not more than 70 % alcohol but a flash point below 23°C cannot be exempted by special provision 145 if they are carried in receptacles of not more than 250 litres but more than 5 litres, as their flash points fall in the scope of PG II flammable liquids according to 2.3.2.6. This is not consistent with the entries in the Dangerous Goods List.

3. By referring to alcohol contents instead of packing groups in these two special provisions, this misunderstanding can be eliminated. Thus, the experts from China propose that the current language in special provisions 145 and 146 should be improved as suggested in paragraph 5 below to achieve better clarity.

4. Similar expression can be found in special provision A9 of International Civil Aviation Organization (ICAO) Technical Instructions for PG III entry of UN 3065: “*Alcoholic beverages **containing not more than 70 per cent alcohol by volume**, when packed in receptacles, are not subject to these Instructions when carried as cargo.*”

* A/77/6 (Sect. 20), table 20.6



Proposal

5. In Chapter 3.3 amend special provisions 145 and 146 as follows (deleted text appears in ~~strike through~~ and new text in **bold underlined**):

“145 Other than for air transport, alcoholic beverages ~~of packing group III~~ **containing more than 24 % but not more than 70 % alcohol by volume**, when carried in receptacles of 250 litres or less, are not subject to these Regulations.

146 Other than for air and sea transport, alcoholic beverages ~~of packing group II~~ **containing more than 70 % alcohol by volume**, when carried in receptacles of 5 litres or less, are not subject to these Regulations.”
