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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****Sixty-fourth session**

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Item 6 (d) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations on  
the Transport of Dangerous Goods:****Other miscellaneous proposals****Amendment to 4.1.3.4 of the Model Regulations - Prohibited  
packagings for substances which may become liquid during  
transport****Transmitted by the expert from the Republic of Korea\*****I. Introduction**

1. Both packing instruction P002 in 4.1.4.1 and paragraph 4.1.3.4 of the *Model Regulations* stipulate packagings which are prohibited from being used for solid substances that are liable to become liquid during transport. However, there is an inconsistency between the two provisions, which may cause confusion when shippers apply the regulations.
2. This document contains proposals for amendments to 4.1.3.4 of the *Model Regulations* to prevent any confusion on the usage of packagings for solid substances that are liable to become liquid during transport and to ensure harmonization of the *Model Regulations* with modal regulations.

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\* A/78/6 (Sect. 20), table 20.5.



## II. Explanation

3. Provision 4.1.3.4 lists packagings that should not be used for solid substances liable to become liquid during transport as follows:

“4.1.3.4 The following packagings shall not be used when the substances being transported are liable to become liquid during transport:

Packagings

Drums:	1D and 1G
Boxes:	4C1, 4C2, 4D, 4F, 4G and 4H1
Bags:	5L1, 5L2, 5L3, 5H1, 5H2, 5H3, 5H4, 5M1 and 5M2
Composite packagings:	6HC, 6HD2, 6HG1, 6HG2, 6HD1, 6PC, 6PD1, 6PD2, 6PG1, 6PG2 and 6PH1

...”

4. On the other hand, note <sup>e</sup> in the packing instruction for solid substances (P002) also specifies packagings that should not be used when transporting substances liable to become liquid during transport as follows and includes a reference to 4.1.3.4 (only the rows for boxes are reproduced):

P002	PACKING INSTRUCTION (SOLIDS) (cont'd)			P002
	Maximum net mass (see 4.1.3.3)			
	Packing group I	Packing group II	Packing group III	
<b>Single packagings (cont'd)</b>				
<b>Boxes</b>				
steel (4A) <sup>e</sup>	Not allowed	400 kg	400 kg	
aluminium (4B) <sup>e</sup>	Not allowed	400 kg	400 kg	
other metal (4N) <sup>e</sup>	Not allowed	400 kg	400 kg	
natural wood (4C1) <sup>e</sup>	Not allowed	400 kg	400 kg	
plywood (4D) <sup>e</sup>	Not allowed	400 kg	400 kg	
reconstituted wood (4F) <sup>e</sup>	Not allowed	400 kg	400 kg	
natural wood with sift proof walls (4C2) <sup>e</sup>	Not allowed	400 kg	400 kg	
fibreboard (4G) <sup>e</sup>	Not allowed	400 kg	400 kg	
solid plastics (4H2) <sup>e</sup>	Not allowed	400 kg	400 kg	

<sup>e</sup> These packagings shall not be used when the substances being transported may become liquid during transport (see 4.1.3.4).

5. An inconsistency between the two provisions mentioned above can be found in the section for boxes. According to packing instruction P002, boxes 4A, 4B, 4N, and 4H2 shall not be used when the substances being transported may become liquid during transport. On the other hand, the list in 4.1.3.4 does not include boxes 4A, 4B, 4N, and 4H2, which could lead to confusion for packaging users or workers.

6. In this regard, when comparing modal regulations (ADR, RID, and the International Maritime Dangerous Goods (IMDG) Code, it is clear that boxes 4A, 4B, 4N, and 4H2 are specified in 4.1.3.4 of ADR and RID as not to be used for substances that may become liquid during transport. However, the IMDG Code, like the *Model Regulations*, does not include boxes 4A, 4B, 4N, and 4H2 in 4.1.3.4.

### III. Proposal

7. To prevent confusion and to promote a harmonized application of multimodal transport regulations, the Republic of Korea proposes amendments to paragraph 4.1.3.4 of the *Model Regulations* as follows (new text is in **bold underlined**, deleted text is strikethrough):

“4.1.3.4 The following packagings shall not be used when the substances being transported are liable to become liquid during transport:

Packagings

Drums:	1D and 1G
Boxes:	<b><u>4A, 4B, 4N</u></b> , 4C1, 4C2, 4D, 4F, 4G, <del>and 4H1</del> <b><u>and 4H2</u></b>
Bags:	5L1, 5L2, 5L3, 5H1, 5H2, 5H3, 5H4, 5M1 and 5M2
Composite packagings:	6HC, 6HD2, 6HG1, 6HG2, 6HD1, 6PC, 6PD1, 6PD2, 6PG1, 6PG2 and 6PH1

...”

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