

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

21 June 2024

Sixty-fourth session

Geneva, 24 June-3 July 2024

Item 3 of the provisional agenda

Listing, classification and packing

Assignment of special packing provision PP5 to UN 2029 Hydrazine Anhydrous

Submitted by the expert from the United States of America

I. Introduction

1. During the sixty-third session special packing provision PP5 was assigned to UN 2029 “Hydrazine anhydrous” (informal document INF.27, sixty-third session). Special packing provision PP5 requires packages to be constructed so that explosion is not possible by reason of increased internal pressure and prohibits the use of gas cylinders and gas receptacles.
2. It has been brought to our attention by various stakeholders, primarily those involved in the space industry, that the changes as adopted would have unintended consequences and result in increased risk of release in transport.

II. Discussion

3. Hydrazine anhydrous utilized in the space industry has a long history of safe transport in stainless steel pressure receptacles. Transportation in steel pressure receptacles provides a durable packaging that ensures safety during transportation, storage, and use. It has been noted that the addition of venting or over-pressurization prevention mechanisms introduce points of failure that potentially further increases the risk of damage or inadvertent release or undesired operation. The industry has indicated they currently have no alternative packagings suitable to move sufficient quantities of hydrazine for their operations while complying with PP5.
4. This document supports Sustainable Development Goal 16, “*Peace, justice, and strong institutions.*” Specifically, the proposal supports target 16.6 to “*Develop effective, accountable and transparent institutions at all levels.*”

III. Proposal

5. Solicit inputs from Sub-Committee members on the appropriateness of the assignment of special packing provision PP5 to UN 2029 and any potential impacts not highlighted during previous discussions on the topic. Any inputs received will be utilized to support a potential formal paper to the sixty-fifth session.